



Local Plan 2040

Have Your Say on the Future of Your Borough

Bedford Borough Council – Local Plan 2040 Draft Plan Consultation Response Form

We would prefer to receive your comments via our online system www.bedford.gov.uk/localplan2040
In particular, if you are a planning consultant or agent please help us to speed up the production of local plans by using the online system. If you require assistance, please contact us on 01234 718070.

Please only use this form if you cannot respond online and to make your comments on the Local Plan 2040 Draft Plan and its supporting documents. You will need to have the document you want to comment on to hand so that you can enter the appropriate references. Copies of the document are available to view on the Council's website www.bedford.gov.uk/LocalPlan2040 and in paper copy (by 45 minute appointment) at Bedford Central Library, Harpur Street, Bedford MK40 1PG (01234 718174). Subject to Covid restrictions being lifted on 19th July, paper copies will also be made available at all libraries in the borough, plus the key documents will be available at Rushden, St Neots, Biggleswade and Flitwick libraries during normal opening hours.

Please email this response form to us: planningforthefuture@bedford.gov.uk

Alternatively, responses can be sent by post. Please attach a stamp and send to:

Planning Policy Team
Bedford Borough Council, Borough Hall, Cauldwell Street
Bedford, MK42 9AP

PLEASE DO NOT SUBMIT COMMENTS IN MORE THAN ONE FORMAT OR SEND TO MORE THAN ONE EMAIL ADDRESS. If you have submitted comments electronically you do not need to print and post them. **All responses (electronic and paper) must be received by 5pm on 3 September 2021.**

Your contact information will be kept on the Planning Policy database so that we can keep you up to date about this and other planning policy documents. Personal data will be collected and processed in accordance with the Data Protection Act and the General Data Protection Regulations. Further information can be found on the council's Data Protection webpage and in the Privacy Notices for planning policy.

All responses will be made public.

CONTACT DETAILS

Personal details

Title _____

Name _____

Address _____

Postcode _____

Telephone Number _____

Email _____

Your interest (Please mark X one box only)

Land owner

Resident

Consultant

Agent

Other

Please use a separate form (this page) for each consultation document paragraph, policy or evidence base document you are commenting on.

Which paragraph number, policy number or evidence base document are you commenting on?

Bedford Borough Council – Local Plan 2040

Please add your comments in the box below, and continue on an additional sheet if necessary.

1.1 Bedford Borough Council has an up to date local plan that makes provision for growth to 2030. Normally local plans are reviewed every five years but this update is required sooner in order to reflect emerging national policies for the Oxford to Cambridge Arc. Policy 1 of the Local Plan 2030 requires that the review is progressed swiftly, with the submission of the plan to government for examination by January 2023 so that examination in public can commence. If that deadline is missed, then for the purposes of determining planning applications our local plan policies will be deemed to be 'out of date' in the same way as they would if we were to be unable to show a five year supply of housing land, meaning that local control over where development will happen will be much reduced.

1.2 The timetable set for the Council's plan review was challenging before the Covid-19 pandemic began, but the change in working practices and limitations placed on the Council's staff, partner organisations and the Council's consultants over the past 15 months has meant that keeping on-track has been extremely difficult. Progress has been slowed as a result of the switch to remote working, restrictions on site visits (especially during the first half of 2020) and depleted staff resources across the Council and within other agencies.

Staploe Parish could be profoundly and permanently affected by the decisions made in this plan and yet we have been unable to meet with residents in public to discuss this until very recently. However, we found it particularly difficult to respond to the 25% increase in the area of the Dennybrook (site 977) site because it was made public at short notice 8 months after the call for sites deadline closed and only one month before the consultation opened.

1.3 Nevertheless, a first Issues and Options consultation took place as scheduled during summer 2020. The purpose of that first stage was to invite comment on the scope of the review, the time period that an updated plan should cover and the kinds of locations where future growth might take place. The responses to that consultation have informed this document and in particular have helped to shape the growth options that appear in later sections. A summary of consultation comments is available (see Table 1) and all responses are published in full on-line.

Staploe Parish Council did not agree that this consultation was sound or fair. We responded to question 4 as follows: **“Staploe Parish Council object in the strongest terms to the suggestion in the brown option that our parish is a brownfield site or under utilised land.** Our whole parish is classed as open countryside for planning purposes. Our three tiny hamlets are not even classed as a small settlement in the Local Plan 2030 definition (6.21) and we are therefore defined as open countryside. We feel that describing the brown option which would see the majority of our parish covered in a large scale, high density, urban development as using brownfield or under utilised land is very misleading. We believe this could compromise the validity of the consultation as those responding would logically propose development on brownfield or under-utilised land over greenfield sites.

We believe the pros and cons list for the brown option is very inaccurate for our parish. A large development in Staploe parish would not support services etc in Bedford – we are 13 miles away and people would use services in St. Neots which are already under pressure due to large scale development on the eastern side of the town. There would be very little potential for residents here to make sustainable travel choices – we have one bus on Thursday and it would require huge investment to improve public transport. This would not reduce the need for growth in rural areas – we are a rural area and it proposes building all over our parish. Development in our parish would not improve viability of retail and leisure in Bedford Borough. People would go to St. Neots.”

We still feel that this is a fair reflection that the issues and options consultation was flawed because it led people to believe that our rural parish was urban with underutilised or brownfield land which is very far from the case.

It is unusual to for a draft Local Plan to attempt a review of the strategic growth for the borough whilst at the same time reviewing certain planning policies that will support the Local Plan going forward. It may be through deciding the strategic growth of the borough that additional or existing policies need reviewing. For example, should the growth strategy employ a rail based growth strategy (e.g. new settlement at Little Barford linking to the East West rail station to the south of St Neots) then there may be a need for a specific rail based policy. Policy 90S of the adopted Local Plan identifies the infrastructure that may come forward as part of the Oxford-Cambridge Arc as well as supporting identified allocations. However, a separate rail based specific policy intervention may be required should the growth strategy around rail as a 'sustainable' form of growth be selected. Nevertheless, BBC need to be confident that the growth options identified within the draft Local Plan, or indeed any other suitable growth strategy that might be applied, reflects the current policies within the adopted Local Plan and those that are currently subject to consultation.

In addition, the issues and options consultation was conducted during the covid pandemic when it was not possible to meet more than 6 people outside. We believe this was reflected in the responses: Number of respondents = 315

- 222 were from within the borough – out of a total estimated population of 174,687. This is a pitiful 0.12% response rate
 - 93 were from outside the Borough or did not give a postcode
 - 53% were from individuals.
- Top areas for numbers of responses:

1. Bedford 46
2. Sharnbrook 23
3. Staploe 18 (a 6% response rate which was 50 times the Borough average)

By contrast – no other areas were in double figures. This brings into further question the validity of the consultation.

1.4 At the same time the Council issued a 'call for sites' to update information received during 2014 and 2015 about land that owners wish to make available for development. Around 430 sites were submitted to the Council and similarly these have been available to view on the Council's web site since autumn 2020.

Staploe Parish Council are very concerned that this call for sites initially showed Dennybrook (site 977) as a much smaller site beyond the boundaries of Honeydon. We were only informed in May 2021 (an astonishing 8 months after the call for sites closed) that the site boundary had expanded by approximately 25% to engulf the whole of the hamlet of Honeydon and Begwary. The new site showed many existing homes surrounded on all sides by housing estates. Therefore we believe that the call for sites was not conducted in an open and transparent manner. Residents only had one month to gather their thoughts about this enormous new development of up to 10,800 homes which engulfed their properties before the draft consultation opened. We do not believe this is a fair consultation for them.

Duloe Field (3420) was also added late. We do not believe sites submitted after the deadline should be considered.

1.5 National Policy requires that strategic policies in local plans should look ahead over a minimum of 15 years from adoption¹⁴. With adoption planned for late 2023, the shortest end-date for this plan would be 2038. A longer timescale would have the advantage of giving certainty for a longer period but, as is explained in the paragraphs below, many important strategic decisions that will affect the scale and form of growth in and close to Bedford Borough in the medium and longer term are likely to be made in the next few years. As a result, and having considered the 2020 consultation responses, the Council's view is that 2020 - 2040 is an appropriate time period for this plan. With a requirement now for five-yearly local plan reviews there will be sufficient opportunity to plan beyond 2040 once the regional planning context is clearer.

The plan appears realistic in the context of housing growth identified within the Council's Objectively Assessed Housing Need (OAHN). However, the plan period may be dependent on how strategic growth is applied within the current draft Local Plan. It states within Paragraph 22 of the National Planning Policy framework (NPPF) that 'Strategic policies should look ahead over a minimum 15 year period from adoption...'. However, the same paragraph goes on to state that '*Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.*' It should be pointed out that Paragraph 221 of Annex 1 to the NPPF notes that '*For the purposes of the policy on larger-scale development in paragraph 22, this applies only to plans that have not reached Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage at the point this version is published...*'. On the basis that BBC have not yet reached the Regulation 19 stage, the Council may need to consider looking beyond the current plan period (2040) should there be the introduction of new settlements, for example.

1.6 The government's ambition for the Oxford to Cambridge Arc is well-reported. In the document 'The Oxford-Cambridge Arc Government Ambition and Joint Declaration between Government and Local Partners' (2019) lead Ministers recognise the existing qualities of the location and its potential to attract additional higher quality jobs for existing and new communities. They promote taking a long term view to 2050 and beyond, and commit to embedding 'natural capital' thinking throughout the government's approach to growth, which includes an ambition for up to one million high-quality new homes by 2050.

The Oxford-Cambridge Arc identifies a delivery period of 2050. Bedford Borough Council consider that the draft Local Plan aligns with the Arc in terms of growth and infrastructure, though the two are currently misaligned in terms of timescales. It may be feasible, for example, for a dispersal development strategy to be applied which would align better with the timescales identified within the current draft Local Plan, and therefore accord with policies 22 and 221 of the NPPF. However, large urban extensions and new settlements may need to look beyond 2050, and this would align better with the Arc.

1.7 The declaration itself is silent on housing numbers. It recognises that the Arc is first and foremost an area of significant economic strength and opportunity, and through the joint declaration the partners (including the then 43 local authorities across the Arc) set out to meet the Arc's full economic potential for the benefit of existing and future local communities and businesses, and in the national interest. There is acknowledgement that to achieve this will demand collective determination over the long-term, to deliver significantly more homes in the Arc, of the right quality and in the right places to meet its needs. Also that this might include the expansion of existing as well as the development of new settlements. It will require long-term commitments to provide the enabling infrastructure and to deliver that ahead of the arrival of new communities, and to meet economic and housing ambitions while overall improving rather than degrading the environment in the Arc, in line with commitments in the government's 25 Year Environment Plan^[2].

1.8 In February 2021 the government published a policy paper entitled 'Planning for sustainable growth in the Oxford-Cambridge Arc: an introduction to the spatial framework'. It explains why the government is committed to developing a spatial framework for the Arc; what it will mean for growth, spatial planning and infrastructure provision in the area; and how government will work with communities and local partners to develop it. The intention is to '...develop a long-term Spatial Framework for the Arc that will support better spatial planning, provide a blueprint for better-targeted public investment, give investors and businesses greater long-term certainty over growth plans, and allow communities to shape the long-term future of places across the region. The nature and content of the Spatial Framework will be subject to the outcome of both detailed consultation and sustainability appraisal' (para 2.1). A first public consultation is planned for summer 2021 which is two years later than initially intended in the joint declaration.

Staploe Parish Council do not agree that there should be extensive new housing development in the Oxford Cambridge arc. Much of it is rural and with productive agricultural land which we believe should be retained. We believe that any large scale allocations over 2,500 homes should not be permitted until the Oxford Cambridge arc has developed its spatial strategy.

1.9 In response to this delay, some local authorities in the Arc have adjusted their local plan production timetables so that planning activity follows the development of the Arc Spatial Framework in order to create a more joined up process. Government however has urged Councils in the Arc to carry on with plan-making and, in Bedford Borough's case, the consequences of not doing so could be significant for the reasons relating to policies becoming "out of date" described above; so preparation of this local plan must continue. The relationship between the local plan timetable and the published timetable for the preparation of the Arc Spatial Framework is shown below.

1.10 Whilst this local plan will progress alongside the development of the Spatial Framework it shares many of the overarching principles relating to economic growth and the natural environment. In these respects, the two will be aligned.

No comment

1.11 A review of business space will inform the allocation of new employment land in order to support the expansion of existing businesses and to attract inward investment. Where housing growth is concerned, as a result of existing commitments (including those made and to be made in neighbourhood plans) and new allocations to be made in this plan, Bedford Borough will make provision for significantly more homes as described in the Arc joint declaration. It will do this as a result of government's new standard method for calculating housing need which means an uplift of 33% when compared to the locally-calculated housing growth planned for in the Local Plan 2030.

1.12 The Council already has strong planning policies to protect and enhance the natural environment and as the new Environment Bill passes through its various parliamentary stages, the Council will consider how any of these policies need to change to bring them up to date. Strategic work to map the location of natural capital assets across the Arc is being translated to a more localised geography and we will look to see how our policies might embrace this new way of identifying environmental value and potential to achieve net gains alongside development.

Staploe Parish Council believe it is important to map the soil (which forms part of the natural capital) and therefore the agricultural land grades much more closely as this is a key part of the National Planning Policy Framework. The agricultural land classification map published by Natural England presents a number of difficulties: it is only available at a scale of 1:250,000 and so it is not easy to identify individual parcels of land. The map states that it “represents a generalised pattern of land classification grades and any enlargement of the scale of the map would be misleading”. The webpage states that the map “is intended for strategic uses” and is not “sufficiently accurate for use in assessment of individual fields or sites and any enlargement could be misleading”. The map is based on old survey information and circumstances may have subsequently changed. The map does not differentiate between Grades 3a and 3b. Grade 3a is included in the NPPF’s definition of best and most versatile agricultural land (along with Grades 1 and 2). Of the larger sites as far as we can see Dennybrook (site 977) (along with all land in Staploe Parish) is all grade 2 land with possibly a bit of grade 1 near Wyboston. Great Barford and Colworth are largely grade 3 and Twinwoods is grade 2 but has a significant proportion of brownfield land. However, we believe Bedford Borough Council should commission a more detailed survey of the agricultural land quality in the Borough.

1.14 The Local Plan 2040 will be a partial update of existing policies. The Local Plan 2030 was adopted only last year and the vast majority of its policies are up to date and do not need to change. Remaining policies in the earlier Allocations and Designations Local Plan have been reviewed and, in the majority of cases, they remain fit for purpose and similarly do not need to change at this time. We asked for views about the scope of the plan during last year's consultation and the responses have helped us to focus on the following key policy areas:

- Development Strategy to 2040 and delivery of growth in order to meet national policy requirements
- Town centre and retail policies in order to support a more flexible future for our centres with a reduced focus on retailing
- Updated development management policies (those used to help make decisions on planning applications) to do with
 - Self-build and custom homebuilding
 - Quality of development and residential space standards
 - Environmental net gain

The scope of the Local Plan is broadly acceptable to Staploe Parish Council. However, it is unusual to for a draft Local Plan to attempt a review of the strategic growth for the borough whilst at the same time reviewing certain planning policies that will support the Local Plan going forward. It may be through deciding the strategic growth of the borough that additional or existing policies need reviewing. For example, should the growth strategy employ a rail based growth strategy (e.g. new settlement at Little Barford linking to the East West rail station to the south of St Neots) then there may be a need for a specific rail based policy. Policy 90S of the adopted Local Plan identifies the infrastructure that may come forward as part of the Oxford-Cambridge Arc as well as supporting identified allocations. However, a separate rail based specific policy intervention may be required should the growth strategy around rail as a ‘sustainable’ form of growth be selected. Nevertheless, BBC need to be confident that the growth options identified within the draft Local Plan, or indeed any other suitable growth strategy that might be applied, reflects the current policies within the adopted Local Plan and those that are currently subject to consultation.

1.15 The reasons why new policies for other subjects are not proposed in this paper are explained in Section 8.0 below.

1.16 Appendix 1 shows which current planning policies would be replaced by proposed new ones.

1.17 Following on from last year's consultation we have considered comments about the different locations for growth and have developed combinations that could deliver new jobs and homes. A long list of options is given in the Development Strategy Topic Paper and a fuller list in the Sustainability Appraisal.

1.18 The Council's emerging preferred options are listed below in Section 3 but your comments are now invited on all options before a choice is made, and we ask you to tell us of others that you think should be considered.

Staploe Parish Council object to the presentation of the 4 options in the summary leaflet that residents received regarding the draft plan. There is just one small statement saying that other options are available in the summary leaflet and we believe this is misleading – most people will only respond based on the summary document and are unlikely to look up the alternative options.

We also object in the strongest terms to the fact that Dennybrook (site 977) (land west of Wyboston) is presented as a development of only 2,500 homes and it is not made at all clear in the summary leaflet that this is the first phase of a large town of 10,800 homes.

A number of our residents have told us that they believe they have to choose from the 4 options and that they believe Dennybrook would remain a site of only 2,500 homes based on the information they have seen in the consultation. This demonstrates that it is misleading.

It is stated in the Council’s Draft Sustainability Appraisal, dated June 2021 (DSA) that all spatial options have been assessed. However, options 2b, 2c, and 2d clearly identify two new settlements. In order to fully consider the social, economical and environmental impacts associated with these two proposed settlements, their impacts need to be assessed separately and fed into the draft SA. At present, the options testing within the draft SA are not accurate as a result. Accordingly, Bedford Borough Council have not robustly assessed the options, and therefore have not adequately evaluated the likely significant effects on the environment, contrary to The Environmental Assessment of Plans and Programmes Regulations 2004.

Staploe Parish Council would like to request that the decision about which sites to choose for development be made at full council with Borough Councillors being given the opportunity to vote on it before it reaches the “is it sound and is it legal” stage of the plan – regulation 19. We would ask that the decision is therefore not made by the Mayor of Bedford’s executive powers. We would also like to request that, where a Borough Councillor is conflicted due to a conflict of interests, an alternative Borough Councillor representing the same party is permitted to vote on the matter in their stead. Our Borough Councillor Tom Wootton is conflicted regarding the proposed site at Dennybrook (site 977) and we would like Councillor Moon to vote in his stead.

1.19 Before deciding on a strategy and selecting land for development we are also inviting comments on the call for sites submissions. The assessment work so far completed by the Council is available to help you.

Staploe Parish Council will be commenting on site submissions in our parish, Little Barford (907), Twinwoods (883) and Colworth (1002). See comments under each of these site assessments.

1.20 In addition, we are publishing for comment the latest evidence base documents. These may be updated in the light of comments we receive and, along with other evidence including a plan wide viability appraisal, will be available again for you to comment on at the next stage (during 2022).

1.22 **Bedford Borough Natural Capital Assessment Report** - Natural Capital Solutions

This should include a more accurate survey of the agricultural land grades – particularly in the areas where larger sites are proposed for development. Soil and agricultural land is an important consideration according to the NPPF.

1.23 **Bedford Borough Transport Model New Settlements and the A6** – AECOM

BBC have concluded that Twinwoods creates such a traffic problem at the Clapham Road/Manton Lane junction in Bedford that it is not a suitable development site as the developer has not proposed a solution to the congestion at that junction. Staploe Parish Council believe that conclusion is incorrect.

- The transport model starts with the 2018 base year model previously developed and then adds to that the growth identified by Bedford Borough Council in the adopted local plan to 2030 and includes the mitigations (traffic schemes) that are planned to happen by 2030. This then creates the reference case at year 2030, against which the different development scenarios to 2040 and to 2050 are compared.
- One of the measures of the impact the developments will have on the highway network, is the Junction-Volume Capacity Ratio. This shows how congested the junctions will be – so a figure of 100% means that the junction is fully utilised, i.e. congested, leading to delays at that junction.
- Tables 3.15 (for 2040) and 3.16 (for 2050, but incorrectly titled for 2040) show the Junction-Volume Capacity Ratios for the PM peak Hour in 2040 and 2050 for the unmitigated and mitigated Twinwoods scenarios. The 4 lines for the Clapham Road/Manton Lane junction as follows:

Table 3.15: Forecast Average Junction Volume-Capacity Ratios by Scenario for 2040 Forecasts, PM Peak Hour (17:00 to 18:00)

Location	2018 Base	2030 Ref Case	2040 Twinwoods (ScnA)		2040 Colworth (ScnB)		2040 Twinwoods & Colworth (ScnC)	
			exc. mitigation	inc. mitigation	exc. mitigation	inc. mitigation	exc. mitigation	inc. mitigation
Clapham Road / Manton Lane, Clapham Road (N)	67%	101%	101%	99%	100%	101%	101%	99%
Clapham Road / Manton Lane, Manton Lane	56%	104%	105%	105%	105%	105%	106%	104%
Clapham Road / Manton Lane, Clapham Road (S)	54%	75%	93%	94%	92%	93%	92%	92%
Clapham Road / Manton Lane, Shakespeare Road	43%	103%	103%	105%	103%	103%	103%	105%
A6 / Western Bypass, A6 (N)	24%	42%	40%	45%	38%	47%	40%	45%

Table 3.16: Forecast Average Junction Volume-Capacity Ratios by Scenario for 2040 Forecasts, PM Peak Hour (17:00 to 18:00)

Location	2018 Base	2030 Ref Case	2050 Twinwoods (ScnA)		2050 Colworth (ScnB)		2050 Twinwoods & Colworth (ScnC)	
			exc. mitigation	inc. mitigation	exc. mitigation	inc. mitigation	exc. mitigation	inc. mitigation
Clapham Road / Manton Lane, Clapham Road (N)	67%	101%	101%	99%	100%	99%	100%	99%
Clapham Road / Manton Lane, Manton Lane	56%	104%	107%	107%	105%	103%	106%	106%
Clapham Road / Manton Lane, Clapham Road (S)	54%	75%	92%	95%	93%	93%	93%	93%
Clapham Road / Manton Lane, Shakespeare Road	43%	103%	103%	105%	103%	104%	103%	105%
A6 / Western Bypass, A6 (N)	24%	42%	40%	42%	38%	45%	30%	43%

- You will see that the black boxes denote 100% or more Ratio – i.e. the junction is completely full (on 3 of the 4 legs) and congested.
- The report at paras 3.5.21 and 3.5.22 states:
- 3.5.21 Table 3.9 to Table 3.16 highlight that there is forecast to be significant delays and congestion issues at the Clapham Road / Manton Lane Junction, particularly in the PM Peak hour. These forecast delays and high volume-capacity ratios are present within the 2030 reference case, with volume-capacity ratios forecast to be above 100% on three out of the four arms at this junction. These high forecast volume capacity ratios are maintained or are forecast to worsen in the 2040 and 2050 forecasts including the proposed Twinwoods and / or Colworth developments.
- 3.5.22 As part of the forecasting assumptions for the reference case (see Table 2.2), an improvement scheme at this location, which provides a dedicated left-turn lane for Clapham Road southbound traffic to Manton Lane and the part-signalisation of the roundabout, is included. Further mitigation at this location was considered as part of this study to alleviate the forecast congestion, but due to the constraints at this location (such as existing buildings and Bedford Modern School) no further mitigation has been proposed as part of this study.
- The junction is already completely full at 2030 before any new developments or the addition of an east west rail station in Bedford Town Centre. Therefore this is a Bedford Borough Council problem that will already happen due to the growth in the adopted Local plan 2030 (1500 new homes all north of Bedford which will impact the A6 by 2030). Bedford Borough Council will have to solve this – not the developers of Twinwoods but a development at Twinwoods might contribute some infrastructure funding to help mitigate the problems on the A6
- It should be noted that when Twinwoods is included the Junction-Volume Capacity Ratios increase (on 3 of the 4 legs) from 100% to between 101% and 105% which is negligible in the overall scale of the issue.
- Para 4.2.9 concludes :
- 4.2.9 Significant forecast delays and capacity constraints are forecast at the Clapham Road / Manton Lane roundabout in northern Bedford, primarily in the PM Peak hour, both in the reference case and with the inclusion of the proposed developments and mitigation measures. The reference case includes improvements to this junction; however, further mitigation at this junction to alleviate the forecast congestion has not been proposed as part of this study due to the physical constraints at this location. Without further capacity improvements or measures to reduce the forecast traffic at this location, the forecast congestion at this junction is likely to be a constraint on the delivery of growth along the A6 corridor to the north of the borough.
- This demonstrates that this is not a new development issue, but an existing issue that Bedford Borough Council will have to solve before 2030 – particularly in view of the fact that all traffic wanting to access the new East West Rail Station from the north of the Borough will need to use the A6 to reach the station in central Bedford.
- The Transport Modelling undertaken by AECOM in support of the strategic options in the Draft Local Plan 2040 is fundamentally flawed for the following reasons.
- No validation or calibration of the traffic model has been undertaken which is not in keeping with Department for Transport WebTAG guidance.
- It is assumed that the Bedford Borough Transport Model was undertaken using Saturn, which was the model of choice for the Bedford Town Centre modelling project in 2015. In this case, Saturn cannot directly Model Public Transport therefore it is assumed that the engineers have made some significant assumptions with respect to public transport and trips being used, which have not been validated or calibrated.
- TAG unit M1.2 introduces the National Trip End Model (NTEM). It includes forecasts of population, households, workforce and jobs over 30 years which are used in a series of models that forecast population, employment, car ownership, trip ends and traffic growth by Middle Layer Super Output Area (MSOA). The NTEM data set can be viewed using the TEMPro (Trip End Model Presentation Program) software. TEMPro estimates of trip ends at any level below aggregate regions (e.g. MSOA, district, or county level) are subject to uncertainty and should not be used as constraints in matrix development process without verification and possible adjustments. No uncertainty log was prepared which is a recommendation of WebTAG modelling guidance.
- For direct use in matrix development, trip rate information estimated from household survey data should be considered instead to underpin trip end estimates at zone level. There is a risk that model may not be realistic or sensible due to the error around the model parameters used, or limitations in the extent to which the model can represent human behaviour. Therefore, before using any mathematical model, it is essential to check that it produces credible outputs consistent with observed behaviour. This is usually done by running the model for the base year (either the current year or a recent year), and:

- comparing its outputs with independent data (validation);
- checking that its response to changes in inputs is realistic, based on results from independent evidence (realism testing); and
- checking that the model responds appropriately to all its main inputs (sensitivity testing).
- Five types of data can be collected and used to inform most models:
- data on the transport network, including the physical layout, number of lanes, signal timings, public transport frequencies and capacities;
- counts of vehicles or persons on transport services, links or at junctions;
- journey times;
- queue lengths at busy junctions;
- interview surveys, in which transport users are asked to describe trips either through household travel diaries or intercept surveys (e.g. roadside interviews, public transport onboard interview surveys).
- These types of checks have not been undertaken to validate / calibrate the model.
- AECOM have derived trip ends using CTripEnds for a number of journey purposes. Expanding synthetic trip ends produced by CTripEnd to the local zoning system is considered to be subject to significant discrepancies from observed especially if validation and the calibration exercise has not been undertaken.
- It is also important to note that strategic models are not designed for use in a scheme specific assessment. For such an assessment it is recommended a revised forecast model would be produced from a recalibrated base year model using additional and more recent data and targeted to reflect a more specific geographical focus of resources and modelling effort.

1.24 **Bedford Borough Transport Model New Settlements and the Black Cat junction** - AECOM

- The Transport Modelling undertaken by AECOM in support of the strategic options in the Draft Local Plan 2040 is fundamentally flawed for the following reasons.
- No validation or calibration of the traffic model has been undertaken which is not in keeping with Department for Transport WebTAG guidance.
- It is assumed that the Bedford Borough Transport Model was undertaken using Saturn, which was the model of choice for the Bedford Town Centre modelling project in 2015. In this case, Saturn cannot directly Model Public Transport therefore it is assumed that the engineers have made some significant assumptions with respect to public transport and trips being used, which have not been validated or calibrated.
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- For direct use in matrix development, trip rate information estimated from household survey data should be considered instead to underpin trip end estimates at zone level. There is a risk that model may not be realistic or sensible due to the error around the model parameters used, or limitations in the extent to which the model can represent human behaviour. Therefore, before using any mathematical model, it is essential to check that it produces credible outputs consistent with observed behaviour. This is usually done by running the model for the base year (either the current year or a recent year), and:
 - comparing its outputs with independent data (validation);
 - checking that its response to changes in inputs is realistic, based on results from independent evidence (realism testing); and
 - checking that the model responds appropriately to all its main inputs (sensitivity testing).
 - Five types of data can be collected and used to inform most models:
 - data on the transport network, including the physical layout, number of lanes, signal timings, public transport frequencies and capacities;
 - counts of vehicles or persons on transport services, links or at junctions;
 - journey times;
 - queue lengths at busy junctions;
 - interview surveys, in which transport users are asked to describe trips either through household travel diaries or intercept surveys (e.g. roadside interviews, public transport onboard interview surveys).
 - These types of checks have not been undertaken to validate / calibrate the model.
 - AECOM have derived trip ends using CTripEnds for a number of journey purposes. Expanding synthetic trip ends produced by CTripEnd to the local zoning system is considered to be subject to significant discrepancies from observed especially if validation and the calibration exercise has not been undertaken.

- It is also important to note that strategic models are not designed for use in a scheme specific assessment. For such an assessment it is recommended a revised forecast model would be produced from a recalibrated base year model using additional and more recent data and targeted to reflect a more specific geographical focus of resources and modelling effort.

1.25 **Bedford Borough Transport Model New Settlement West of Wyboston** – AECOM

The Transport Modelling undertaken by AECOM in support of the strategic options in the Draft Local Plan 2040 is fundamentally flawed for the following reasons.

No validation or calibration of the traffic model has been undertaken which is not in keeping with Department for Transport WebTAG guidance.

It is assumed that the Bedford Borough Transport Model was undertaken using Saturn, which was the model of choice for the Bedford Town Centre modelling project in 2015. In this case, Saturn cannot directly Model Public Transport therefore it is assumed that the engineers have made some significant assumptions with respect to public transport and trips being used, which have not been validated or calibrated.

TAG unit M1.2 introduces the National Trip End Model (NTEM). It includes forecasts of population, households, workforce and jobs over 30 years which are used in a series of models that forecast population, employment, car ownership, trip ends and traffic growth by Middle Layer Super Output Area (MSOA). The NTEM data set can be viewed using the TEMPro (Trip End Model Presentation Program) software. TEMPro estimates of trip ends at any level below aggregate regions (e.g. MSOA, district, or county level) are subject to uncertainty and should not be used as constraints in matrix development process without verification and possible adjustments. No uncertainty log was prepared which is a recommendation of WebTAG modelling guidance.

For direct use in matrix development, trip rate information estimated from household survey data should be considered instead to underpin trip end estimates at zone level. There is a risk that model may not be realistic or sensible due to the error around the model parameters used, or limitations in the extent to which the model can represent human behaviour. Therefore, before using any mathematical model, it is essential to check that it produces credible outputs consistent with observed behaviour. This is usually done by running the model for the base year (either the current year or a recent year), and:

- comparing its outputs with independent data (validation);
- checking that its response to changes in inputs is realistic, based on results from independent evidence (realism testing); and
- checking that the model responds appropriately to all its main inputs (sensitivity testing).

Five types of data can be collected and used to inform most models:

- data on the transport network, including the physical layout, number of lanes, signal timings, public transport frequencies and capacities;
- counts of vehicles or persons on transport services, links or at junctions;
- journey times;
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It is also important to note that strategic models are not designed for use in a scheme specific assessment. For such an assessment it is recommended a revised forecast model would be produced from a recalibrated base year model using additional and more recent data and targeted to reflect a more specific geographical focus of resources and modelling effort.

As part of the Bedford Borough Transport Model documents it is quoted that average departing trips are 20 to 25 vehicles, which may be below the trip rates assumed as part of a detailed development assessment. The extract below is taken from the New Settlement West of Wyboston document.

2.4.3 No site-specific trip rates have been applied within this assessment of the proposed Dennybrook development, with the trip rates defined within CTripEnd (the DfT's trip-end model underpinning its National Trip-End Model (NTEM) forecasts) adopted. These represent 'average' trip rates and in general result in around 20 to 25 outbound car vehicle trips in the AM Peak hour, which may be below the trip rates assumed as part of a detailed development assessment.

It is unknown what scenario of Dennybrook (site 977) development that the above “20 to 25 outbound car vehicle trips in the AM peak hour” relate to, however an outbound TRCS residential trip rate is somewhere between 0.23 to 0.33 vehicles per dwelling.

The development scenario ranges from 2,500 dwellings to 10,150 dwellings. On this basis and using a 0.25 departure trip rate results in 625 to 2,538 departing trips all of which would be home based departure trips. The model assumes 5 loading zones which therefore means there could be 125 to 508 vehicles per loading zone. This is significantly higher than the 20 to 25 outbound vehicle used by the AECOM model, assuming they have loaded it per node.

AECOM may claim that some of the departing trips will be internal and therefore will not cross cordon line however taking the 125 departing vehicle trips associated with 2,500 dwellings scenario; 20% of these departing vehicles are considered not to be leaving the area. This percentage decreases further if the worst case number of dwellings is being considered, i.e. 10,150 dwellings. It has previously been highlighted that the AECOM model has not been validated / calibrated and now given the apparent significant under valuation of the likely vehicle trips that will be generated, it is clear that the assessment of the capacity of junctions and the highway network is fundamentally flawed.

The significant undervaluation of generated vehicle trips could be argued by AECOM as being a reduction due to the impact of the public transport. However, the proposed new railway stations associated with the East West Rail Link are located to the east of the A1, which is significantly far enough away for the Dennybrook development to be considered to not directly serve it without requiring a vehicle car trip to be generated. In this scenario it more likely that occupiers of Dennybrook (site 977) dwellings will continue their journey by car as opposed to transferring onto rail.

Given this all of the assessments undertaken by AECOM to determine the rerouting and vehicle km travelled for any scenario are highly unlikely to be representative.

Town planning principles are that new development should be centred on and around existing sustainable urban area where local infrastructure exists and allow residents to travel using public transport to serve the development which can be easily extended.

If larger new settlements are the only realistic option then they should be centred on transport hubs such as new railway stations so that they become the heart of the community and the de facto mode of travel. Locating a new settlement on the edge of town / out of town where the transport hub is also not well connected leads to a disjointed sustainable public transport which will always be second best to car travel.

For this reason we believe that if a new settlement is required the preferred option should be Little Barford as it will be very close to the new East West Rail station and within walking distance of the current mainline station at St Neots. However, our second preferred option would be Twinwoods where we believe a parkway station and mitigations for the A6 can be provided towards the end of the plan period. Much of the site is brownfield land, there are no flooding issues and it does not engulf a local existing settlement.

1.26 Bedford Borough Transport Model Local Plan Assessment Report – AECOM

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It is assumed that the Bedford Borough Transport Model was undertaken using Saturn, which was the model of choice for the Bedford Town Centre modelling project in 2015. In this case, Saturn cannot directly Model Public Transport therefore it is assumed that the engineers have made some significant assumptions with respect to public transport and trips being used, which have not been validated or calibrated.

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- comparing its outputs with independent data (validation);
- checking that its response to changes in inputs is realistic, based on results from independent evidence (realism testing); and
- checking that the model responds appropriately to all its main inputs (sensitivity testing).

Five types of data can be collected and used to inform most models:

- data on the transport network, including the physical layout, number of lanes, signal timings, public transport frequencies and capacities;
- counts of vehicles or persons on transport services, links or at junctions;
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It is also important to note that strategic models are not designed for use in a scheme specific assessment. For such an assessment it is recommended a revised forecast model would be produced from a recalibrated base year model using additional and more recent data and targeted to reflect a more specific geographical focus of resources and modelling effort.

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2.4.3 No site-specific trip rates have been applied within this assessment of the proposed Dennybrook development, with the trip rates defined within CTripEnd (the DfT's trip-end model underpinning its National Trip-End Model (NTEM) forecasts) adopted. These represent 'average' trip rates and in general result in around 20 to 25 outbound car vehicle trips in the AM Peak hour, which may be below the trip rates assumed as part of a detailed development assessment.

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The development scenario ranges from 2,500 dwellings to 10,150 dwellings. On this basis and using a 0.25 departure trip rate results in 625 to 2,538 departing trips all of which would be home based departure trips. The model assumes 5 loading zones which therefore means there could be 125 to 508 vehicles per loading zone. This is significantly higher than the 20 to 25 outbound vehicle used by the AECOM model, assuming they have loaded it per node.

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The significant undervaluation of generated vehicle trips could be argued by AECOM as being a reduction due to the impact of the public transport. However, the proposed new railway stations associated with the East West Rail Link are located to the east of the A1, which is significantly far enough away for the Dennybook development to be considered to not directly serve it without requiring a vehicle car trip to be generated.

In this scenario it more likely that occupiers of Dennybrook (site 977) dwellings will continue their journey by car as opposed to transferring onto rail.

Given this all of the assessments undertaken by AECOM to determine the rerouting and vehicle km travelled for any scenario are highly unlikely to be representative.

Town planning principles are that new development should be centred on and around existing sustainable urban area where local infrastructure exists and allow residents to travel using public transport to serve the development which can be easily extended.

If larger new settlements are the only realistic option then they should be centred on transport hubs such as a new railway station so that they become the heart of the community and the de facto mode of travel. Locating a new settlement on the edge of town / out of town where the transport hub is also not well connected leads to a disjointed sustainable public transport which will always be second best to car travel.

1.27 Bedford Borough Transport Model Local Plan Assessment Summary Report – AECOM

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Given this all of the assessments undertaken by AECOM to determine the rerouting and vehicle km travelled for any scenario are highly unlikely to be representative.

Town planning principles are that new development should be centred on and around existing sustainable urban area where local infrastructure exists and allow residents to travel using public transport to serve the development which can be easily extended.

If larger new settlements are the only realistic option then they should be centred on transport hubs such as a new railway station so that they become the heart of the community and the de facto mode of travel. Locating a new settlement on the edge of town / out of town where the transport hub is also not well connected leads to a disjointed sustainable public transport which will always be second best to car travel.

1.28 **Development Strategy Topic Paper** – BBC

1.29 **Bedford Employment Land Study – 2021 (Part 1)** - BBC

1.30 **Bedford Employment Land Study – 2021 (Part 2)** - BBC

1.31 **Gypsy & Traveller Accommodation Assessment** - ORS

1.32 **Healthy Weight Environments Topic Paper** - BBC

1.33 **Issues & Options Consultation - summary and responses** – BBC

Staploe Parish Council did not agree that this Issues and Options consultation was sound or fair. We responded to question 4 as follows: "**Staploe Parish Council object in the strongest terms to the suggestion in the brown option that our parish is a brownfield site or under utilised land.** Our whole parish is classed as open countryside for planning purposes. Our three tiny hamlets are not even classed as a small settlement in the Local Plan 2030 definition (6.21) and we are therefore defined as open countryside.

We feel that describing the brown option which would see the majority of our parish covered in a large scale, high density, urban development as using brownfield or under utilised land is very misleading. We believe this could compromise the validity of the consultation as those responding would logically propose development on brownfield or under-utilised land over greenfield sites.

We believe the pros and cons list for the brown option is very inaccurate for our parish. A large development in Staploe parish would not support services etc in Bedford – we are 13 miles away and people would use services in St. Neots which are already under pressure due to large scale development on the eastern side of the town. There would be very little potential for residents here to make sustainable travel choices – we have one bus on Thursday and it would require huge investment to improve public transport. This would not reduce the need for growth in rural areas – we are a rural area and it proposes building all over our parish. Development in our parish would not improve viability of retail and leisure in Bedford Borough. People would go to St. Neots.”

We still feel that this is a fair reflection that the issues and options consultation was flawed because it led people to believe that our rural parish was urban with underutilised or brownfield land which is very far from the case.

It is unusual to for a draft Local Plan to attempt a review of the strategic growth for the borough whilst at the same time reviewing certain planning policies that will support the Local Plan going forward. It may be through deciding the strategic growth of the borough that additional or existing policies need reviewing. For example, should the growth strategy employ a rail based growth strategy (e.g. new settlement at Little Barford linking to the East West rail station to the south of St Neots) then there may be a need for a specific rail based policy. Policy 90S of the adopted Local Plan identifies the infrastructure that may come forward as part of the Oxford-Cambridge Arc as well as supporting identified allocations. However, a separate rail based specific policy intervention may be required should the growth strategy around rail as a ‘sustainable’ form of growth be selected. Nevertheless, BBC need to be confident that the growth options identified within the draft Local Plan, or indeed any other suitable growth strategy that might be applied, reflects the current policies within the adopted Local Plan and those that are currently subject to consultation.

In addition, the issues and options consultation was conducted during the covid pandemic when it was not possible to meet more than 6 people outside. We believe this was reflected in the responses: Number of respondents = 315

- 222 were from within the borough – out of a total estimated population of 174,687. This is a pitiful 0.12% response rate
- 93 were from outside the Borough or did not give a postcode
- 53% were from individuals.

Top areas for numbers of responses:

- Bedford 46
- Sharnbrook 23
- Staploe 18 (a 6% response rate which was 50 times the Borough average)
- By contrast – no other areas were in double figures. This brings into further question the validity of the consultation. We believe Bedford Borough Council should be arguing for an extension of time such that the Local Plan 2030 remains “in date” for another year to enable proper consultation, to allow the East West rail route to be announced and for the Oxford Cambridge Arc to decide about development corporations.

1.34 **Landscape Character Assessment** – LUC

Staploe Parish Council note the following statements in the assessment:

1E.1.37 Conserve and enhance surviving historic field boundaries and restore hedges where possible in areas of former ancient enclosures, while retaining the open character of areas which were formerly open field land.

1E.1.38 Enhance the hedgerows consistent management and resist development that will result in further loss/fragmentation of hedgerows and hedgerow trees. Encourage the growth of new hedgerow trees to maintain landscape structure and connectivity.

1E.1.42 Conserve the character of the rural roads and limit urbanising influences – widening/kerbing and ensure that traffic management measures are sympathetic to the rural character.

Staploe Parish Neighbourhood Plan survey demonstrated that the peace and quiet, open countryside views and rural feel of our parish are of great value to our residents. In addition, our single track, often high sided lanes and roads are a distinctive local feature. Many have roadside nature reserves due to the rare plants present such as Bath Asparagus. The verges and hedges are cut as little as we can manage in order to maintain visibility and this has enhanced them as green corridors and added to the rural feel of the area. Developing a large new town of Dennybrook (site 977) or other large sites in Duloe such as Cobholden, Manor Farm, Duloe Field, Flints Field and Top Homes may necessitate widening of these roads which would urbanise them and destroy valued hedgerows which is contrary to the comments in this landscape character assessment.

We would also like to point out that our hamlets are very different to Thurleigh. Our three hamlets of Staploe, Duloe and Honeydon (including Begwary) are very sparsely populated often with large gaps between homes and usually only with houses on one side of the road. All have countryside views from their gardens. This is different from a larger settlement such as Thurleigh on which the Landscape Character Assessment appears to be modelling future development.

1.35 **Local Housing Needs Assessment (LHNA)** - ORS

1.36 **Bedford Town Centre Study** – NEXUS

Staploe Parish Council would like to point out that development should be focussed around Bedford Town wherever possible as this will support Bedford town centre.

1.37 **Self-build Topic Paper** - ORS

1.38 **Town Centres and Shopping Policies Topic Paper** - BBC

1.39 **Site Selection Methodology – update June 2021** – BBC

If we use numbers (2,1,0,0,-1,-2) to replace Bedford Borough Council's "scoring" (++,+,0,?,X,XX) and assume that all criteria have equal weight, the options can be totalled and compared. Option 2a is best and scores 7. Option 6 is worst and scores -9.

The other points are of note:

1. Of the 15 criteria, 7 criteria have the same score for all options, so make no difference to the assessment. These include 2. Protecting and maintain biodiversity and 8. Landscape character.
2. Of the remaining 8 criteria where scores vary between options, 3 are effectively the same: 1. Air Quality; 3. Reduce CO2; 15. Reduce travel/promote sustainable transport. So in reality, of the 15 criteria only 6 criteria make a difference. We do not believe this is reasonable or sufficient.
3. In the favoured options 2a to 2d, we believe that Bedford Borough Council have failed to properly consider the true impact of new settlements (incl. Dennybrook (site 977)) on:
 - a. Promoting Bedford as a town centre – all options 2 and 3 score the same, but new settlements such as Dennybrook will push people to St. Neots, not Bedford. However this issue is recognised in options 4, 5 and 6.
 - b. Landscape character – all options score the same and the words fail to fully recognise the impact of new settlements on the existing landscape.
 - c. Max development on brownfield/avoid loss of agricultural land – despite the loss of agricultural land at Wyboston being highlighted in the words, this is not recognised in the scoring of 2b and 2d as these are the same as 2a. Shockingly the words say for all options "Although most new development is likely to be on greenfield land" – it seems that Bedford Borough Council readily accept this and have made no effort to maximise use of their stock of brownfield land (eg. 70ha at Twinwoods) – contrary to the NPPF.

1.40 **Site Assessment Pro formas** - BBC

1.41 **Small Sites Topic Paper** - BBC

1.42 **Strategic Flood Risk Assessment (part 1)** – JBA

This assessment was done in Nov 2020. There was significant flooding in Honeydon and St Neots in December 2020. There are 5 watercourses which run from Staploe Parish into the rivers just upstream of St Neots. We don't believe that a development of up to 10,800 homes at Dennybrook (site 977) is appropriate and we believe it would increase the chance of flooding.

NPPF 2020 states at 167. *When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.*

We believe that Dennybrook (site 977) would increase the risk of flooding elsewhere and that this flood risk assessment should be updated to allow for this. It should also incorporate cross border effects ie. the assessment shows watercourses going from Staploe parish into St Neots but no indication is given that these would affect the flood risk in St Neots.

The methodology for preparing a strategic flood risk assessment was updated in Sept 2020 and the risk assessments became more stringent therefore this flood risk assessment is out of date and needs to be updated. There is no mention of flooding in Staploe and Honeydon. The brooks in both of these villages flood. No properties have been directly affected in recent years but the roads in both villages flood significantly about once per year and in December 2020 they were very close to flooding homes.

1.43 **Strategic Flood Risk Assessment Appendices** – JBA

1.44 **(Draft) Sustainability Appraisal Report** – BBC

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1.49 We would not expect neighbourhood plans to make large strategic allocations in locations where there is not a choice of site (for example a new settlement), including those that in some cases cross parish boundaries. These will be allocated in the Local Plan 2040.

What influence can a Neighbourhood Plan have on a strategic allocation? And will the development in a strategic allocation be CIL liable in the usual way or would it use section 106 money? Our Neighbourhood Plan survey conducted early in 2021 demonstrated that there was no support for extensive development in our parish. How can this be used to influence a strategic site?

2.1 Vision and Objectives

"The borough's countryside, its intrinsic character and beauty including areas of tranquil retreat will be recognised. Rural communities will embrace appropriate development, in many instances through the preparation of their own neighbourhood plans. This development will reflect each area's unique local character whilst providing and supporting much needed housing and employment, rural facilities and services, including high speed broadband and public transport. Locally important green spaces and valued local landscapes will be protected and enjoyed by all." This is an important statement for the Council. Staploe Parish Council recognise the growth challenges faced by the Council, specifically when attempting to align with the Oxford-Cambridge Arc. That said, the Council's statement would appear contrary should the proposed new settlement of Dennybrook (land west of Wyboston site 977) or the other large sites in the parish be taken forward. Other large sites are 997 (Cobholden), 455 (Manor Farm), Flints Field (930) or 931 (Top Homes). The parish of Staploe is the epitome of intrinsic character and beauty, and it is considered that there are valued local landscapes that would be eroded by such urbanised development. Accordingly, the 'draft vision' can only be taken at face value if it is not upheld.

3.0 Growth and spatial strategy options

Level of housing growth required

3.1 Government guidance sets out a standard method for calculating future housing requirements, which the Council must follow. As a result of the government's recent revisions to the standard method, the figure for Bedford borough currently is 1,275 dwellings per year, giving a total of 25,500 dwellings for the 20 year period from 2020 to 2040. This is the current starting point for the local plan housing requirement.

The current figures result in a 36% increase in the housing stock of the Borough in the space of 20 years which we believe is unreasonable and will profoundly affect the character of the Borough; large areas of which are currently rural. We believe the Borough Council should continue to campaign against such large increases.

3.2 Existing commitments (planning permissions, allocations from current local plans and an allowance for windfall, which together total 13,000 dwellings) mean that based on the standard method figure of 1,275 dwellings p.a. the new local plan will need to allocate land to provide a minimum of 12,500 new dwellings. Further detail is set out in the evidence base document Local Housing Needs Assessment (LHNA), however it should be noted that the standard method number for the borough has been altered by recent affordability figures and the LHNA was produced in relation to the previous requirement of 1,305 dwellings p.a.

3.3 The annual requirement in the adopted Local Plan 2030 is 970 dwellings per year. The 1,275 figure for this new plan represents a substantial increase to the adopted plan and will bring with it considerable challenges. The standard method is calculated using inputs taken from household and affordability data which are updated regularly. This means that during the plan preparation period, as mentioned above, the Local Housing Need may change. We will therefore keep the Local Housing Need figure under review and will change the figure as necessary at the time that the plan for submission is prepared.

3.4 As well as setting the housing requirement for the plan period, the plan for submission will also include a trajectory to provide an indication of the timing of the delivery of the housing sites which are identified to meet the target. This will flow from the identification of the plan strategy and work on detailed site assessment and a greater understanding of the timing of the delivery of infrastructure needed to support growth.

Staploe Parish Council believe that dependence on new settlements is a risky strategy as they are inevitably built out towards the end of the plan period, and potentially beyond and therefore we do not believe there should be too much dependence on large new settlements. Where new settlements are to be built we believe they should be within walking distance of sustainable transport options ie. Little Barford.

The plan period may be dependent on how strategic growth is applied within the current draft Local Plan. It states within Paragraph 22 of the National Planning Policy framework (NPPF) that 'Strategic policies should look ahead over a minimum 15 year period from adoption...'. However, the same paragraph goes on to state that '*Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.*' It should be pointed out that Paragraph 221 of Annex 1 to the NPPF notes that '*For the purposes of the policy on larger-scale development in paragraph 22, this applies only to plans that have not reached Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage at the point this version is published...*'. On the basis that BBC have not yet reached the Regulation 19 stage, the Council may need to consider looking beyond the current plan period (2040) should there be the introduction of new settlements, for example.

In addition, the Oxford-Cambridge Arc identifies a delivery period of 2050. BBC consider that the draft Local Plan aligns with the Arc in terms of growth and infrastructure, though the two are currently misaligned in terms of timescales. It may be feasible, for example, for a dispersal development strategy to be applied which would align better with the timescales identified within the current draft Local Plan, and therefore accord with policies 22 and 221 of the NPPF. However, large urban extensions and new settlements may need to look beyond 2050, and this would align better with the Arc.

3.5 Whilst more detailed work will be needed to determine this, we will consider whether, given the significant investment in infrastructure which would be necessary to deliver development in the borough at scale, a stepped trajectory approach may be appropriate for this plan. This could mean, for example, that the delivery target could be kept at 970 per year until 2030 and then increased to 1,580 dwellings per year to make up the rest of the plan requirement over the remaining 10 years. By 2030 the Black Cat Junction improvements will be complete, the East West Rail section through Bedford Borough will be complete (including new and re-modelled stations) and sufficient lead-in time will have been available for strategic projects to be planned in detail, enabling these higher numbers to be achieved. The forward planning will include arrangements for new sustainable travel links, with the intention that these are available from day one in order to embed and promote sustainable travel choices.

Staploe Parish Council had understood that delivery had to be constant ie. approx. the same number per year. We believe it is important that there is no risk that the Borough could be perceived not to be delivering their housing targets thereby increasing the risk of speculative developments.

3.6 In addition to setting the overall quantum of housing which is to be provided, a local plan must also contain advice on the level and type of affordable housing which is needed and how the needs of particular groups (such as older people and those in need of accessible housing) are to be met. The LHNA also provides the evidence base to update the policies of the Local Plan 2030 on these matters. Policy 58S Affordable housing and 59S Housing mix will be updated once the viability of the local plan as a whole has been tested.

3.7 This consultation is, however, primarily concerned with:

- determining how much employment land needs to be planned for,
- how many homes need to be provided across the plan period,
- what infrastructure would be needed to support this growth and
- what, in the context of the vision and objectives outlined earlier in the document, is the appropriate spatial strategy for the plan.

Level of employment growth required

3.8 Taking account of planned population growth to 2040, the requirement for new employment land by that date is calculated to be 171 hectares (ha). Overall, the currently available supply of such land in the borough amounts to 48 ha leaving a requirement for 123 ha to be allocated in the local plan. Further detail on how this has been calculated is set out in the evidence base document Bedford Employment Land Study, March 2021, with a summary at paragraph 6.6 below.

Employment growth should be centred around the transport corridors and where there are sustainable modes of public transport and other sustainable choices such as walking or cycling. On this basis we believe that this should be provided adjacent to Bedford / Kempston urban area.

3.9 The local plan must also plan for other growth requirements that may arise, for example additional shops and services, schools and transport infrastructure.

Growth strategy options

3.10 An important purpose of the local plan is to decide where in the borough growth should go. In last year's Issues and Options consultation the Council outlined six development locations which could form part of a strategy for growth. These were:

- Brown – Urban based growth
- Yellow – A421-based growth
- Pink – Rail-based growth
- Orange – East-West Rail northern station growth
- Grey – Dispersed growth
- Red – New settlement based growth

3.11 The responses to the issues and options consultation indicated that there was broad consensus favouring development focussed on the existing urban areas and the A421 corridor, and possible new railway stations which might be delivered on the new East-West Rail line. The responses are published in full on the Council's website at <https://www.bedford.gov.uk/planning-and-building/planning-policy-its-purpose/local-plan-review/> and a summary of the issues raised along with the Council's response can be found in the document Issues & Options Consultation - summary and responses, see Table 1.

Staploe Parish Council did not agree that this consultation was sound or fair. We responded to question 4 as follows: **“Staploe Parish Council object in the strongest terms to the suggestion in the brown option that our parish is a brownfield site or under utilised land.** Our whole parish is classed as open countryside for planning purposes. Our three tiny hamlets are not even classed as a small settlement in the Local Plan 2030 definition (6.21) and we are therefore defined as open countryside. We feel that describing the brown option which would see the majority of our parish covered in a large scale, high density, urban development as using brownfield or under utilised land is very misleading. We believe this could compromise the validity of the consultation as those responding would logically propose development on brownfield or under-utilised land over greenfield sites.

We believe the pros and cons list for the brown option is very inaccurate for our parish. A large development in Staploe parish would not support services etc in Bedford – we are 13 miles away and people would use services in St. Neots which are already under pressure due to large scale development on the eastern side of the town. There would be very little potential for residents here to make sustainable travel choices – we have one bus on Thursday and it would require huge investment to improve public transport. This would not reduce the need for growth in rural areas – we are a rural area and it proposes building all over our parish. Development in our parish would not improve viability of retail and leisure in Bedford Borough. People would go to St. Neots.”

We still feel that this is a fair reflection that the issues and options consultation was flawed because it led people to believe that our rural parish was urban with underutilised or brownfield land which is very far from the case.

In addition, the issues and options consultation was conducted during the covid pandemic when it was not possible to meet more than 6 people outside. We believe this was reflected in the responses: Number of respondents = 315

- 222 were from within the borough – out of a total estimated population of 174,687. This is a pitiful 0.12% response rate
- 93 were from outside the Borough or did not give a postcode
- 53% were from individuals.

Top areas for numbers of responses:

- Bedford 46
- Sharnbrook 23
- Staploe 18 (a 6% response rate which was 50 times the Borough average)

By contrast – no other areas were in double figures. This brings into further question the validity of the consultation. We believe Bedford Borough Council should be arguing for an extension of time such that the Local Plan 2030 remains “in date” for another year to enable proper consultation, to allow the East West rail route to be announced and for the Oxford Cambridge Arc to decide about development corporations.

3.12 Following the 2020 consultation, the Council commissioned consultants to assess the likely effects of four development scenarios on traffic flows in the borough. That work is published as the evidence base document Bedford Borough Transport Model Local Plan Assessment Summary Report (see Table 1). The report explains that four spatial scenarios, chosen for highway testing purposes, were assessed and it provides a high-level comparison of spatial growth scenarios looking at seven key transport metrics and identifies the mitigation measures that would be required by each scenario. The report offers a comparison between scenarios. More detail on these scenarios is included in the Development Strategy Topic Paper.

The Transport Modelling undertaken by AECOM in support of the strategic options in the Draft Local Plan 2040 is fundamentally flawed for the following reasons.

No validation or calibration of the traffic model has been undertaken which is not in keeping with Department for Transport WebTAG guidance.

It is assumed that the Bedford Borough Transport Model was undertaken using Saturn, which was the model of choice for the Bedford Town Centre modelling project in 2015. In this case, Saturn cannot directly Model Public Transport therefore it is assumed that the engineers have made some significant assumptions with respect to public transport and trips being used, which have not been validated or calibrated.

TAG unit M1.2 introduces the National Trip End Model (NTEM). It includes forecasts of population, households, workforce and jobs over 30 years which are used in a series of models that forecast population, employment, car ownership, trip ends and traffic growth by Middle Layer Super Output Area (MSOA). The NTEM data set can be viewed using the TEMPro (Trip End Model Presentation Program) software. TEMPro estimates of trip ends at any level below aggregate regions (e.g. MSOA, district, or county level) are subject to uncertainty and should not be used as constraints in matrix development process without verification and possible adjustments. No uncertainty log was prepared which is a recommendation of WebTAG modelling guidance.

For direct use in matrix development, trip rate information estimated from household survey data should be considered instead to underpin trip end estimates at zone level. There is a risk that model may not be realistic or sensible due to the error around the model parameters used, or limitations in the extent to which the model can represent human behaviour. Therefore, before using any mathematical model, it is essential to check that it produces credible outputs consistent with observed behaviour. This is usually done by running the model for the base year (either the current year or a recent year), and:

- comparing its outputs with independent data (validation);
- checking that its response to changes in inputs is realistic, based on results from independent evidence (realism testing); and
- checking that the model responds appropriately to all its main inputs (sensitivity testing).

Five types of data can be collected and used to inform most models:

- data on the transport network, including the physical layout, number of lanes, signal timings, public transport frequencies and capacities;

- counts of vehicles or persons on transport services, links or at junctions;
- journey times;
- queue lengths at busy junctions;
- interview surveys, in which transport users are asked to describe trips either through household travel diaries or intercept surveys (e.g. roadside interviews, public transport onboard interview surveys).

These types of checks have not been undertaken to validate / calibrate the model.

AECOM have derived trip ends using CTripEnds for a number of journey purposes. Expanding synthetic trip ends produced by CTripEnd to the local zoning system is considered to be subject to significant discrepancies from observed especially if validation and the calibration exercise has not been undertaken.

It is also important to note that strategic models are not designed for use in a scheme specific assessment. For such an assessment it is recommended a revised forecast model would be produced from a recalibrated base year model using additional and more recent data and targeted to reflect a more specific geographical focus of resources and modelling effort.

As part of the Bedford Borough Transport Model documents it is quoted that average departing trips are 20 to 25 vehicles, which may be below the trip rates assumed as part of a detailed development assessment. The extract below is taken from the New Settlement West of Wyboston document.

2.4.3 No site-specific trip rates have been applied within this assessment of the proposed Dennybrook development, with the trip rates defined within CTripEnd (the DfT's trip-end model underpinning its National Trip-End Model (NTEM) forecasts) adopted. These represent 'average' trip rates and in general result in around 20 to 25 outbound car vehicle trips in the AM Peak hour, which may be below the trip rates assumed as part of a detailed development assessment.

It is unknown what scenario of Dennybrook (site 977) development that the above "20 to 25 outbound car vehicle trips in the AM peak hour" relate to, however an outbound TRCS residential trip rate is somewhere between 0.23 to 0.33 vehicles per dwelling.

The development scenario ranges from 2,500 dwellings to 10,150 dwellings. On this basis and using a 0.25 departure trip rate results in 625 to 2,538 departing trips all of which would be home based departure trips. The model assumes 5 loading zones which therefore means there could be 125 to 508 vehicles per loading zone. This is significantly higher than the 20 to 25 outbound vehicle used by the AECOM model, assuming they have loaded it per node.

AECOM may claim that some of the departing trips will be internal and therefore will not cross cordon line however taking the 125 departing vehicle trips associated with 2,500 dwellings scenario; 20% of these departing vehicles are considered not to be leaving the area. This percentage decreases further if the worst case number of dwellings is being considered, i.e. 10,150 dwellings. It has previously been highlighted that the AECOM model has not been validated / calibrated and now given the apparent significant under valuation of the likely vehicle trips that will be generated, it is clear that the assessment of the capacity of junctions and the highway network is fundamentally flawed.

The significant undervaluation of generated vehicle trips could be argued by AECOM as being a reduction due to the impact of the public transport. However, the proposed new railway stations associated with the East West Rail Link are located to the east of the A1, which is significantly far enough away for the Dennybook development to be considered to not directly serve it without requiring a vehicle car trip to be generated. In this scenario it more likely that occupiers of Dennybrook (site 977) dwellings will continue their journey by car as opposed to transferring onto rail.

Given this all of the assessments undertaken by AECOM to determine the rerouting and vehicle km travelled for any scenario are highly unlikely to be representative.

Town planning principles are that new development should be centred on and around existing sustainable urban area where local infrastructure exists and allow residents to travel using public transport to serve the development which can be easily extended.

If larger new settlements are the only realistic option then they should be centred on transport hubs such as a new railway station so that they become the heart of the community and the de facto mode of travel. Locating a new settlement on the edge of town / out of town where the transport hub is also not well connected leads to a disjointed sustainable public transport which will always be second best to car travel.

3.13 Based on the building blocks of the development locations previously consulted upon, we have undertaken further work to define in more detail a range of potential alternative spatial strategies for the plan. These are set out in the Development Strategy Topic Paper, which also explains how they have been derived.

3.14 As a result of this work there are seven draft alternatives which vary in their focus, from concentrating growth in the urban area, to growth in villages and at new settlements in the A6 and A421 corridors. For some alternatives, more than one option is available.

3.15 Currently, based on work we have undertaken to date, the emerging preferred options (taken from the longer list in the Development Strategy Topic Paper) are below.

Staploe Parish Council believe that the summary leaflet sent round to all houses in the Borough is flawed in that it does not make it sufficiently clear that other options can be selected or proposed, it does not distinguish between Little Barford or Dennybrook (site 977) and it doesn't make it clear that the 2,500 homes at Dennybrook would be the first phase of a 10,800 home development. This is a fundamental flaw which we believe undermines the value of the responses to this consultation.

3.16 We would like your views on which of the alternatives / options should form the strategy of the local plan. We still have more work to do over the coming months to determine the best growth strategy for Bedford Borough and will take into consideration your comments before a decision is made. To help inform that decision, we have carried out an appraisal of the likely social, economic and environmental effects of each alternative and this may be helpful when considering the options. The results of that work are published as the Draft Sustainability Appraisal Report, May 2021 (see Table 1).

3.17 If you think that there are other strategies we should be considering, please let us know. These may be ones set out in the Development Strategy Topic Paper or completely different alternatives.

Option 2b: Development in and around the urban area, plus A421 transport corridor with rail based growth parishes and southern parishes, plus one new settlement ([AT LITTLE BARFORD](#))

- Within the urban area (1,500 dwellings).
- Adjoining the urban area (1,500 dwellings), up to 51 ha employment.
- Transport corridor – rail based growth: land within the parishes of Kempston Hardwick, Stewartby and Wixams (low option) (5,500 dwellings), up to 80 ha employment.
- Transport corridor – south: land within the parishes of Cotton End, Elstow, Kempston Rural, Shortstown, Wilstead and Wootton (1,500 dwellings).
- New settlement at Little Barford (3,085 dwellings) or Wyboston (2,500 dwellings), up to 20 ha employment.
- Total between 12,500 and 13,085 dwellings and up to 151 ha employment.

Staploe Parish Council proposed in response to the Issues and Options Paper that the more appropriate growth strategy would be to apply a dispersed growth strategy (grey option), targeting housing and employment growth attached and within existing settlements and along transport corridors. Such a strategy would negate the need to build on the wider 'open countryside' attributed to the Parish of Staploe and align with the parish's submitted objections to being classified as "Urban Growth".

Staploe Parish Council consider that the dispersed growth strategy is still applicable which would include housing growth to existing serviced settlements, plus A421 transport corridor and rail growth, as well as the proposed new settlement of Little Barford (option 2b, in part). Such a strategy would provide 13,085 dwellings, including at least an additional 10% allowance for growth to small and medium scale housing sites associated with the existing key and rural serviced settlements. Applying the 'low option' to the rail corridor would reduce the development pressures along this corridor.

In support of a dispersed growth strategy, it makes clear at Paragraph 68 of the NPPF that the Council's Local Plan should identify a supply of housing covering 'years one to five, specific developable sites or broad locations for growth, for years 6 – 10 and, where possible, for years 11 – 15 of the plan'. Paragraph 69 goes on further to state that 'Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.' The development around existing served settlements would provide for these small and medium sites, which could deliver early in the plan period negating the reliance of large urban extensions and new settlements which inevitably are built out towards the end of the plan period, and potentially beyond. It is noted within the [Settlement Hierarchy \(September 2018\)](#) that the main urban settlement of Bedford/Kempston provides the most services, employment, public transport and facilities, and it is therefore where additional urban development should be focused.

In addition to this, further sites can be allocated to key and rural serviced settlements as identified in sections 3 and 4 of the Settlement Hierarchy report, which identifies six key service centres and 10 rural service centres. Further development in and around these settlements would support existing services and facilities. It is also noted that the report is currently being reviewed. Staploe Parish Council would like to highlight that our parish has always been classified as open countryside in the settlement hierarchy so we are surprised that we are now deemed suitable for large scale development and would like to know what has changed.

In terms of windfall development, this would be identified over and above any proposed allocations to existing serviced settlements. The Small Sites Topic Paper (June 2021) notes that the windfall requirement for Bedford Borough Council is 2,250 dwellings over the plan period. BBC have identified through the topic paper that this figure would be exceeded by 920 over the plan period, contributing positively to delivery. Whilst windfall cannot be entirely relied upon, the growth strategy outlined at paragraph 3.7 can provide for a quantum of development that is over and above that of the required housing need. It should also be noted that Bedford Borough Council easily exceeds the NPPF requirement of 10% development on small sites through windfall sites.

The proposed rail corridor development for option 2b identifies around 5,500 dwellings for the areas of Kempston Hardwick, Stewartby and Wixams. Applying the 'low option' to the rail corridor would reduce the development pressures along this corridor. However, it should be noted that applying the additional new settlement of Little Barford would add an additional 3,085 dwellings in the 'rail corridor'. The preference of Little Barford as a new settlement will mean that the proposed East West rail Station to the south of St Neots will provide for a truly sustainable form of development where there is a choice of sustainable modes of public transport – adhering to the strategic objectives of the Council and the draft Local Plan. The site at Little Barford has better connectivity to the existing settlement of St Neots and to the existing mainline station than Dennybrook (site 977). This settlement at Little Barford would enable access to a large number of services and facilities, including existing employment which would reduce the need to travel by car. In addition, the timing for the East West rail connection between Bedford and Cambridge is due to commence in 2025. This could potentially align with the delivery of Little Barford. Future masterplanning for the Little Barford settlement could join up with detailed track alignment and station location for the East West rail station. St Neots already has planned expansions to the east at Loves Farm and Wintringham Park and Little Barford would align with this strategic expansion. In contrast any development at Dennybrook (site 977) would form part of the first phase of a large new town of up to 10,800 homes in an entirely rural, unserviced location.

In terms of the proposed settlement at Dennybrook (site 977) (site land west of Wyboston), this 'new settlement' does not provide a suitable alternative. This proposed settlement provides for around 2,500 homes. It is located very close to the existing settlement of St Neots and Wyboston and entirely engulfs the existing hamlets of Honeydon and Begwary. It appears to offer very little separation causing potential coalescence. This new settlement would also be car dependent with limited access to the wider road network due to the existing narrow roads. There is poor connectivity in terms of a choice of sustainable modes of transport, including the train. Further details in respect of the proposed development at Dennybrook are addressed in the site assessment for Dennybrook (site 977).

It is evident that the Council's Draft Sustainability Appraisal, dated June 2021 (DSA) that all spatial options have been assessed. However, options 2b, 2c, and 2d clearly identify two new settlements. In order to fully consider the social, economical and environmental impacts associated with these two proposed settlements, their impacts need to be assessed separately and fed into the draft SA. At present, the options testing within the draft SA are not accurate as a result. Accordingly, Bedford Borough Council have not robustly assessed the options, and therefore have not adequately evaluated the likely significant effects on the environment, contrary to The Environmental Assessment of Plans and Programmes Regulations 2004.

Another option may be a new settlement of 2,500 homes at Twinwoods or Colworth. The Parish Council believe that the problems on the A6 north of Bedford are going to need to be resolved anyway in order to support the housing development proposed in the 2030 plan and for residents to access the east west rail station in the centre of the town. We believe that development of a new settlement of up to 3,000 homes at Twinwoods (site 883) or Colworth (site 1002) could provide the infrastructure funding to support improvements to the A6 which have long been needed and provide residents with access to the east west rail station in Bedford. A northern parkway station could be considered in future to provide sustainable transport for those in the north of the Borough. Twinwoods would include a significant proportion of brownfield land and Colworth includes lower quality (grade 3) agricultural land and so would comply with the NPPF requirement to utilise brownfield land or lower quality agricultural land before high quality agricultural land. These sites would also support Bedford Town Centre. Colworth was the site supported in the 2035 plan which was later reviewed. The A6 was not a considered sufficiently problematic to prevent this site being adopted – the site was dropped because it was difficult to mitigate against the noise from Santa Pod. So we find it hard to understand why the A6 is deemed such an insurmountable problem now.

Transport Strategy

3.18 Bedford is part of the England's Economic Heartlands (EEH) Sub-National Transport Body. The EEH Transport Strategy provides an overall framework for transport policies and delivery across the region. It is drafted so that planning and highway authorities can develop their own suite of policies and plans which reflect their individual local issues.

3.19 However, the over-riding ambition set out in the Strategy is that we have entered a once in a lifetime opportunity to shape the transport future and deliver change. The basic premise for transport investment is that business as usual will not get us to where we want to be and will not enable the area to fulfil its economic and sustainable growth potential.

3.20 What this means is that in order to deliver sustainable growth; transport investment, travel behaviour and the way we think about moving around will need to change. The impact of continuing with current travel behaviour will have a detrimental impact on the very things that make the area successful, including the attractive environment and the network of small and medium sized towns and cities across the Oxford to Cambridge Arc.

3.21 Increased economic activity and growing populations, if left to continue in traditional patterns of movement and behaviour, will mean people spend longer on congested transport networks, the environment will be degraded, and quality of life expectations will not be met.

3.22 The EEH Strategy includes a five-point plan of action which is supported by Bedford Borough Council. The five actions are:

- Focus on **decarbonisation** of the transport system by harnessing innovation and supporting solutions which create green economic opportunities
- Promote investment in digital infrastructure as a means of improving connectivity, in order to **reduce the need to travel**
- Use delivery of **East West Rail** and mass rapid transit systems as the catalyst for the transformation of our strategic public transport networks
- Champion increased investment in active travel and shared transport solutions to **improve local connectivity** to ensure that everyone has the opportunity to realise their potential
- Ensure that our **freight and logistics needs continue to be met** whilst **lowering the environmental impact** of their delivery

3.23 Within Bedford, sustainable growth provides the context to deliver transport improvements for existing and new communities which reflect the ambitions of the EEH Transport Strategy. The following overarching principles provide a framework for Bedford's existing transport policies, and are able to support both the requirements to reduce the need to travel and the provision of good quality infrastructure which can support the needs of the economy and the environment:

Principle 1 - Support delivery of low carbon transport by working towards reduced congestion, digital connectivity, and a net zero carbon system by 2040

Principle 2 – Promote connectivity and accessibility in new development, and link new and existing communities

Principle 3 – Support opportunities for active travel and green infrastructure

Principle 4 – Promote and support infrastructure development which reflects the ambitions of the three preceding principles.

3.24 The current policies contained in the adopted development plan have been reviewed and are felt to be sufficiently robust to deliver the above principles. As a result they do not need to change. More detail can be found in the Development Strategy Topic Paper.

3.25 An initial review of the transport schemes needed to support local plan growth has been included in the scenario modelling undertaken by the Council's transport consultant and is available as appendices to the reports they have produced (see Table 1). Further work will be undertaken to inform the spatial strategy of the plan and the Infrastructure Delivery Report which will accompany it.

Infrastructure items are already identified within the adopted Local Plan, principally at policy 90S. What is critical is the timing for delivery of necessary infrastructure to support the adopted Local Plan and draft Local Plan going forward. If there is a transport corridor approach to growth then additional junction improvements may be required, and priority bus routes that interconnect with existing and proposed rail stations, including the East West rail station to the south of St Neots. We also believe that it is important to improve the A6 to the north of Bedford to enable those in the north of the Borough to access the town centre and the new East West rail station.

Staploe Parish Council do not believe that the transport modelling was adequate. The Transport Modelling undertaken by AECOM in support of the strategic options in the Draft Local Plan 2040 is fundamentally flawed for the following reasons.

No validation or calibration of the traffic model has been undertaken which is not in keeping with Department for Transport WebTAG guidance.

It is assumed that the Bedford Borough Transport Model was undertaken using Saturn, which was the model of choice for the Bedford Town Centre modelling project in 2015. In this case, Saturn cannot directly Model Public Transport therefore it is assumed that the engineers have made some significant assumptions with respect to public transport and trips being used, which have not been validated or calibrated.

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- comparing its outputs with independent data (validation);
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Five types of data can be collected and used to inform most models:

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2.4.3 No site-specific trip rates have been applied within this assessment of the proposed Dennybrook development, with the trip rates defined within CTripEnd (the DfT's trip-end model underpinning its National Trip-End Model (NTEM) forecasts) adopted. These represent 'average' trip rates and in general result in around 20 to 25 outbound car vehicle trips in the AM Peak hour, which may be below the trip rates assumed as part of a detailed development assessment.

It is unknown what scenario of Dennybrook (site 977) development that the above “20 to 25 outbound car vehicle trips in the AM peak hour” relate to, however an outbound TRCS residential trip rate is somewhere between 0.23 to 0.33 vehicles per dwelling.

The development scenario ranges from 2,500 dwellings to 10,150 dwellings. On this basis and using a 0.25 departure trip rate results in 625 to 2,538 departing trips all of which would be home based departure trips. The model assumes 5 loading zones which therefore means there could be 125 to 508 vehicles per loading zone. This is significantly higher than the 20 to 25 outbound vehicle used by the AECOM model, assuming they have loaded it per node. AECOM may claim that some of the departing trips will be internal and therefore will not cross cordon line however taking the 125 departing vehicle trips associated with 2,500 dwellings scenario; 20% of these departing vehicles are considered not to be leaving the area. This percentage decreases further if the worst case number of dwellings is being considered, i.e. 10,150 dwellings. It has previously been highlighted that the AECOM model has not been validated / calibrated and now given the apparent significant under valuation of the likely vehicle trips that will be generated, it is clear that the assessment of the capacity of junctions and the highway network is fundamentally flawed.

The significant undervaluation of generated vehicle trips could be argued by AECOM as being a reduction due to the impact of the public transport. However, the proposed new railway stations associated with the East West Rail Link are located to the east of the A1, which is significantly far enough away for the Dennybrook development to be considered to not directly serve it without requiring a vehicle car trip to be generated. In this scenario it more likely that occupiers of Dennybrook (site 977) dwellings will continue their journey by car as opposed to transferring onto rail.

Given this all of the assessments undertaken by AECOM to determine the rerouting and vehicle km travelled for any scenario are highly unlikely to be representative.

Town planning principles are that new development should be centred on and around existing sustainable urban area where local infrastructure exists and allow residents to travel using public transport to serve the development which can be easily extended.

If larger new settlements are the only realistic option then they should be centre on transport hubs such as a new railway stations so that they become the heart of the community and the de facto mode of travel. Locating a new settlement on the edge of town / out of town where the transport hub is also not well connected leads to a disjointed sustainable public transport which will always be second best to car travel.

If Little Barford is deemed unsuitable our second preferred option would be a new settlement of 2,500 homes at Twinwoods or Colworth. The Parish Council believe that the problems on the A6 north of Bedford are going to need to be resolved anyway in order to support the housing development proposed in the 2030 plan and for residents to access the east west rail station in the centre of the town. We believe that development of a new settlement of up to 3,000 homes at Twinwoods (site 883) or Colworth (site 1002) could provide the infrastructure funding to support improvements to the A6 which have long been needed and provide residents with access to the east west rail station in Bedford. A northern parkway station could be considered in future to provide sustainable transport for those in the north of the Borough. Twinwoods would include a significant proportion of brownfield land and Colworth includes lower quality (grade 3) agricultural land and so would comply with the NPPF requirement to utilise brownfield land or lower quality agricultural land before high quality agricultural land. These sites would also support Bedford Town Centre. Colworth was the site supported in the 2035 plan which was later reviewed. The A6 was not a considered sufficiently problematic to prevent this site being adopted so we find it hard to understand why the A6 is deemed such an insurmountable problem now.

Housing development on small sites

3.26 The Council is required by the National Planning Policy Framework to deliver 10% of its housing requirement on small sites (sites no larger than one hectare). This is to create diversity in the type of sites that will be developed across the borough, encourage activity from smaller and medium sized businesses and generate a consistent year-on-year supply of houses, particularly when it is known that larger sites can have a significant lead in time before development commences.

3.27 Work has been undertaken to determine the number of completions delivered on sites of one hectare or less over recent years and this has demonstrated that there is a strong link between windfall and small sites' delivery for the borough. Development sites which have not been allocated as part of the local plan process are called 'windfall sites'. They normally comprise previously-developed sites that have unexpectedly become available. For the monitoring years 2015-2020 the number of dwellings built on small sites was consistently above 10% of the annual housing requirement. At 31 March 2020, 24.1% of housing supply was on small sites. Further detail is set out in the Small Sites Topic Paper.

3.28 As a consequence, the Local Plan 2040 will not include allocation policies for small sites simply to satisfy this specific requirement of government policy, as we expect sufficient small sites to continue to be delivered as a result of windfall development. Small sites may however be allocated in accordance with development strategy, once it is finalised.

4.6 When added together, the sites which have been submitted for potential housing development total far more dwellings than need to be allocated in this plan, and therefore many of them will not be required for development. However, specific site allocations can only be fixed once consultation comments have been considered and the strategy is firmed up.

There is a preferred option that Staploe Parish Council consider to be the most suitable strategy for Bedford Borough Council to employ when going forward to the next stage of the Local Plan process. As part of the preferred strategy, it is clear that should a new settlement be required in order to meet the Council's Local Housing Needs Assessment (LHN), dated May 2021, then the proposed settlement of Little Barford is considered appropriate, and for the reasons set out in paragraph 3.17. The alternative site at land west of Wyboston (Dennybrook (site 977)) is considered the least preferred option and should be discounted as a sustainable location for development by Bedford Borough Council. The following comments and observations relate to the Call for Sites submission by Taylor Wimpey for a 'new settlement'.

Under form ID: 977, submissions have been made for a new settlement covering around 750 Hectares of land, and providing between 7,500 – 10,150 dwellings (35 dph). BBC have identified the site as a potential 'new settlement' though providing around 2,500 new homes.

As previously noted under paragraph 3.17, the proposed site at Dennybrook (site 977) falls mostly within the Parish of Staploe which is very rural in character. Clearly, any significant development within the Parish would make a permanent change to the landscape and the setting of the small hamlets and rural nature in the locality. Such physical changes cannot be reversed, and the Council would need to be satisfied through a thorough review of the supporting documents to the site submissions that adequately address the impacts, and in terms of achieving sustainable development – in line with Paragraph 16 of the NPPF and section 39(2) of the Planning and Compulsory Purchase Act 2004.

Housing need has been identified through the Council's LHN. Using the process set out in the Planning Practice Guidance "Housing and economic needs assessment" (MHCLG – updated December 2020) the minimum annual LHN figure is 1,305 dwellings per annum. This equates to 26,100 dwellings across the period 2020 – 2040. However, existing committed sites and windfall provide a figure of 13,000 new homes. This provides a figure of 13,100 additional dwellings over the plan period. It is noted that Bedford Borough Council have stated that the housing need is 12,500 as a minimum. Regardless which of the two figures are proposed, the strategy applied within paragraph 3.17 of these representations exceed the Council's housing requirement and negates the need for Dennybrook (site 977) as a new settlement.

When looking at the spatial approach to locating new development, the proposed site at Dennybrook would be located within close proximity to St Neots, with a possible merging into Wyboston. Given the scale of the proposed development at Dennybrook, even at 2,500 dwellings, there would be a potential coalescence to the existing settlement of St Neots. Spatially, this would be contrary to the Council's adopted Local Plan which seeks to prevent coalescence of settlements. In addition, policy 37 of the Council's adopted Local Plan makes clear that developments need to '*Protect the landscape setting and contribute to maintaining the individual and distinct character, and separate identities of settlements by preventing coalescence...*'. It should also be taken into consideration that St Neots is experiencing its own strategic growth with an eastern extension 3,265 dwelling and 20 Ha of employment land over the plan period. Therefore, a new settlement directly to the west of the existing settlement of 2,500 would significantly increase the size of St Neots and may effect delivery rates for housing due to competing sites.

The transport impacts are acutely felt for this proposed new settlement. It is clear that the proposed development at Dennybrook (site 977) would be a car reliant settlement. The proposal will not benefit from a choice of sustainable modes of transport as opposed to other developments, such as urban extensions and the proposed development at Little Barford. Little Barford offers a varied choice of sustainable modes of public transport, including the possible linkage to the East West rail station south of St Neots. It is anticipated that there will be limited employment associated with the Dennybrook (site 977) with commuting considered necessary to nearby employment areas, for example, south of St Neots, Bedford or Cambridge via train. This would be contrary to sustainability objectives identified by BBC, and contrary to paragraphs 73, 104, 105, 106, and 110 of the NPPF, not to mention existing policies within the adopted Local Plan, namely Policies 2S, 87, 88, and 90S. In addition, the Dennybrook site does not align with a strategic transport corridor growth strategy, including rail.

In highways terms, it has been identified previously that Parish of Staploe is rural in character, with most of the road network narrow and single track. The inclusion of 2,500 dwellings (or over 10,000 according to the site promoted) would require significant infrastructure interventions, including the substantial widening of existing roads and junctions, which would lead to an urbanised appearance it what is a tranquil and idyllic countryside setting.

Bedford Borough Council confirm within their assessment of the site submissions, that junction or highway capacity issues are a 'serious capacity constraint'.

These representations are supported by a Highways Technical Note which has reviewed the Transport Modelling undertaken by AECOM in support of the strategic options in the Draft Local Plan 2040. The Technical Note considers that the Transport Modelling is fundamentally flawed. In summary, no validation or calibration of the traffic model has been undertaken, leading to significant discrepancies. Furthermore, within the Transport Model documents, it is quoted that average departing trips are 20 to 25 vehicles. When looking at the development scenario with the transport model of 2,500 – 10,150 dwellings, and using a departure rate of 0.25 departure trip rate, this results in 625 to 2,538 departing trips all of which would be home based departure trips. The model assumes 5 loading zones which therefore means there could be 125 to 508 vehicles per loading zone. This is significantly higher than the 20 to 25 outbound vehicles used by the AECOM model, assuming they have loaded it per node. AECOM may argue that the reduction is due to sustainable modes of transport being used. However, it is made clear within paragraph 4.6 that the site offers very little in terms of alternative sustainable means of transport. Accordingly, the Transport Modelling by AECOM cannot be wholly relied upon.

The landscape setting for the Parish of Staploe is one of a rural character, containing small hamlets, interspersed agricultural buildings, small holdings and arable agricultural land. As mentioned above, the roads are narrow and winding, and contribute to the rural setting. This form of land extends from the A1 to the east to Church End (Colmworth) to the east, down to Colesden to the south, and up to Little Staughton Airfield to the north. The landscape character is depicted within the Council's Landscape Character Assessment (LCA), updated October 2020. The wider Parish of Staploe falls within the Thurleigh Clay Farmland character area (1D). Within the 'evaluation' section at page 55 of the LCA it notes that potential future change could include Small scale development in villages which could lead to loss their distinctive character/ 'Ends'; Road upgrades affecting rural road character; Suburbanisation of villages. This would suggest that even relatively small changes would affect the rural setting of the area. Moreover, the proposed landscape strategy for the area as identified within the LCA is to 'enhance' elements of the landscape. The introduction of 2,500 new dwellings would significantly and permanently erode the rural character of the Parish, contrary to Paragraphs 20, 153, 174, and 175 of the NPPF and policy 37 of the adopted Local Plan.

There are also several Grade II Listed Buildings located within the Parish of Staploe, and would be affected by the proposed development at Dennybrook (site 977). It is evident that the Council's assessment to Call for Site states '*The proposal has the potential to cause harm to heritage assets. This harm may range from low to high. There may be options to avoid, reduce or mitigate this harm and where sites have not been ruled out altogether for other reasons, further assessment will be undertaken to more fully explore impacts on significance and options for harm reduction and mitigation. This further assessment may ultimately lead to the conclusion that the site should not be allocated.*' It is assumed by the above comments that further assessments are required before the site can be considered further as an allocation. It is clear that the existing Listed Buildings are dispersed throughout the area of the proposed development, causing potential impacts to their setting.

A further point to consider is that most of the land covered by the Parish of Staploe is Grade 2 agricultural land as identified by the Agricultural Land Classification. Paragraph 174 (b) of the NPPF makes clear that planning policies should contribute to and enhance the natural and local environment by: '*recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the **best and most versatile agricultural land**, and of trees and woodland...*'. Grade 2 agricultural land is considered to be the best and most versatile agricultural land and would be applicable in this instance. In addition to the above, the Sustainability Appraisal scoring for the proposed new settlement of Dennybrook (site 977) identifies it as scoring lower than Spatial Option 3a. this spatial option was effectively discounted at the 'Issues and Options' consultation stage.

Overall, the land west of Wyboston (Dennybrook) does not offer a truly sustainable form of development, and thereby contrary to policies contained within the NPPF and of the Council's adopted Local Plan. Accordingly, the proposed new settlement should be discounted when considering sites for allocation going forward to the pre-submission draft Local Plan.

If Little Barford is deemed unsuitable our second preferred option would be a new settlement of 2,500 homes at Twinwoods or Colworth. The Parish Council believe that the problems on the A6 north of Bedford are going to need to be resolved anyway in order to support the housing development proposed in the 2030 plan and for residents to access the east west rail station in the centre of the town. We believe that development of a new settlement of up to 3,000 homes at Twinwoods (site 883) or Colworth (site 1002) could provide the infrastructure funding to support improvements to the A6 which have long been needed and provide residents with access to the east west rail station in Bedford. A northern parkway station could be considered in future to provide sustainable transport for those in the north of the Borough. Twinwoods would include a significant proportion of brownfield land and Colworth includes lower quality (grade 3) agricultural land and so would comply with the NPPF requirement to utilise brownfield land or lower quality agricultural land before high quality agricultural land. These sites would also support Bedford Town Centre.

Colworth was the site supported in the 2035 plan which was later reviewed. The A6 was not a considered sufficiently problematic to prevent this site being adopted so we find it hard to understand why the A6 is deemed such an insurmountable problem now.

5.1 Town Centre & Retail Policies

The majority of housing development should be focussed around the urban area of Bedford / Kempston / Wixams / Stewartby in order to support the ailing town centre of Bedford.

6.1 Employment

Employment growth should be centred around the transport corridors and where there are sustainable modes of public transport and other sustainable choices such as walking or cycling. On this basis we believe that employment growth should be around the urban area of Bedford / Kempston / Wixams / Stewartby.

7.1 Development management policies

Staploe Parish Council believe it is very important that sufficient car parking spaces are provided in any new developments (many homes have three cars. Providing less parking space does not prevent people using cars it just prevents emergency services vehicles from accessing homes due to cars parked inappropriately. However, we also believe it is important to provide sustainable forms of transport for new developments and we believe option 2b with a smaller new settlement at Little Barford would be able to provide this.

We believe there should be significant buffering eg. trees, embankments, and green space between new housing developments and existing settlements.

We would like to see a range of housing types such as bungalows, affordable homes etc. However, we believe homes should be no more than two storeys in rural areas.

8.1 Future homes standards

Electric charging points should be provided at all new homes and business premises, homes should be built to a high standard and well insulated (but still with access to loft storage space without compromising the insulation), heating should use ground / air source heat pumps / district or other low carbon heating, solar panels should be incorporated into the designs, bicycle parking should be provided, developments should include considerable green spaces, wooded areas and biodiversity gain of at least 20%. A very high level of flood protection should be included as this is likely to become an increasing issue.