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For and on behalf of  
**Cambridge Meridian Academies Trust**

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

**Lincroft Academy (Site ID: 839 / 832)**

**Prepared by  
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September 2021



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## **APPENDICES**

### **Appendix 1 Land East of Station Road, Oakley – Indicative Masterplan Proposals**

## **2.0 INTRODUCTION AND STRUCTURE OF REPRESENTATIONS**

- 2.1 These representations to the ‘Bedford Local Plan 2040 – Draft Plan Strategy Options and Draft Policies (Regulation 18) Consultation’ have been prepared by the DLP Planning Ltd (DLP) acting on behalf of the Cambridge Meridian Academies Trust (CMAT) in respect of its interests at Lincroft Academy, Oakley.
- 2.2 Submission of these representations, firstly, sets out the immediate need for the expansion of Lincroft Academy to support the intake of approximately 240no. new pupils per annum within the pupil roll, based on current development commitments, and to emphasise that this requirement should be reflected in the policies of the Local Plan 2040.
- 2.3 Secondly the representations support the reclassification of Oakley as a Key Service Centre within the Council’s settlement hierarchy. This is considered to better reflect the settlement’s important role, including in the provision of both primary and secondary education to a wide surrounding area, alongside other services, and facilities. Reclassification is also considered consistent with providing measures through the policies of the development plan to enable Lincroft Academy to address the likely potential requirement for further expansion in the future.
- 2.4 CMAT’s interests include the existing Lovell Road Playing Fields located on land East of Station Road, which form part of the existing facilities of the Lincroft Academy (formerly operated by the Sharnbrook Academy Federation (SAF)).
- 2.5 CMAT’s interests on Land East of Station Road were submitted (via SAF) to the Council as part of the Summer 2020 Call for Sites Consultation. Details were provided as part of a single site boundary also comprising land owned by the Bedfordshire Charitable Trust and promoted on its behalf by Bedfordia Property. The land East of Station Road has subsequently been considered as one site for the purposes of the Council’s site assessment process (assigned Site ID: 839 and 832).
- 2.6 These representations confirm that CMAT, in principle, support indicative land-use proposals for a ‘one-site’ solution, which incorporates the land East of Station Road including that controlled by CMAT, i.e., the Lincroft Academy site and the arrangements for a ‘land swap’ agreed with the adjoining land owners, The Bedfordshire Charitable Trust which would allow for the creation of a single, self-contained educational campus and provide the opportunity

to expand the existing site and facilities, including the relocation of existing sports pitches and other operational improvements to the school including a new school access and parking/circulation space.

- 2.7 Submission of these representations reflects that negotiations between the parties are advanced, ongoing and expect an agreement that will satisfy the Education and Skills Funding Agency regarding the enhancement of facilities to be achieved, retain the support of other stakeholders (including Sport England), and recognise the wider benefits of developing the larger site.
- 2.8 As such, these representations should be read alongside submissions on behalf of Bedfordia Property and the Bedfordshire Charitable Trust outlining the indicative proposals for development on land East of Station Road. The details within this submission have been provided with the agreement of the Bedfordshire Charitable Trust and Bedfordia Property.
- 2.9 This Report addresses the Council's consultation proposals and identifies that the approach proposed insofar as it relates to Oakley is unsound and fails to make sufficient provision or community facilities (including education infrastructure). Modifications are suggested to enable preparation of a version of the draft Local Plan 2040 that addresses the issues identified, ahead of further consultation and subsequent Submission and Examination.
- 2.10 This Report, which should be read alongside any supporting documents and appendices referred to, addresses our instructions to cover the following topics:
- **Section 2** provides further background to the current requirement for expansion at Lincroft Academy and whether this is reflected in the evidence base for the emerging Local Plan 2040
  - **Section 3** considers the Council's settlement hierarchy and the current and expected contribution of Lincroft Academy to Oakley's role and function, both now and in the future
  - **Section 5** summarises the potential benefits of indicative land use proposals on land East of Station Road.

### **3.0 RELATIONSHIP BETWEEN THE ACADEMY'S REQUIREMENTS AND THE EMERGING LOCAL PLAN**

#### **Summary of National Policy and Guidance**

- 3.1 The most recent version of the National Planning Policy Framework was published in July 2021, following commencement of the Council's Preferred Options consultation.
- 3.2 In summary, there is no longer any support in national policy for the outcomes of the Local Plan 2030 Examination in terms of pursuing constraints to the plan period and overall level of growth. Paragraph 20(c) of the NPPF2021 seeks to ensure sufficient provision towards the need for development as part of the approach to preparing strategic policies in order to meet strategic priorities for the area (particularly in terms of the delivery of social and community infrastructure (including health and education)).
- 3.3 The National Planning Policy Framework (NPPF) is clear that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities (paragraph 92). Planning policies should plan positively for social, recreational and community facilities, including supporting the delivery of local strategies to improve well-being and planning positively for the provision and use of shared spaces, including open space (paragraph 93).
- 3.4 In particular the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. To this end local planning authorities are required to take a proactive, positive, and collaborative approach to meeting this requirement, and to development that will widen choice in education (paragraph 95). This means giving great weight to the need to create, expand or alter schools, and being able to work with schools and promoters to identify and resolve key planning issues before applications are submitted.
- 3.5 National Planning Practice Guidance sets out the importance forward planning for the delivery of school places and understanding the direct impact of new development when assessing the potential to secure developer contributions, which are not in principle replaced by alternatives through government funding or delivery programmes (ID: 23b-007-20190315).
- 3.6 In determining when contributions are required it is important for Plans to support the efficient

and timely creation, expansion, and alteration of high-quality schools. Plan-makers should consider existing or planned/committed school capacity and whether it is sufficient to accommodate proposed development within the relevant school place planning areas (ID: 23b-008-20190315).

### **Relationship with the Existing Development Plan – The Bedford Local Plan 2030 and Oakley Neighbourhood Plan**

- 3.7 Current provision within the development plan singularly fails to recognise the requirements of up-to-date policy and guidance in terms meeting the requirements for growth in school places across the borough and particularly to support increased provision at Oakley required by existing development commitments.
- 3.8 Local Plan 2030 does contain proposed strategic policies that seek to prioritise meeting education needs as a strategic priority and a requirement for sustainable development, but these do not specifically address the circumstances at Oakley. Policy 3S(vii) applies specifically in relation to Key Service Centres, looking to ensure that education provision is expanded *where necessary*. Policy 90S deals with infrastructure delivery and ensuring that the Council works with developers to find the most appropriate and beneficial solution. While these policies provide ‘some’ support in principle to deliver the required expansion in school places, they do not reflect the role, function, and importance of Lincroft Academy.
- 3.9 As such, there is no requirement in adopted strategic policies to support bringing forward development that properly reflects the Academy’s current requirements, which were not captured in the evidence base for the Bedford Local Plan 2030 (including the Infrastructure Delivery Plan). As such, the issue has been deferred rather than dealt with through the Local Plan 2030.
- 3.10 As a result, the Oakley Neighbourhood Plan also avoids setting out any policy approach to facilitate the future expansion and enhancement of the facilities at Lincroft Academy.
- 3.11 The submission Neighbourhood Plan includes amongst its objectives a need to *“maintain a sustainable community, including a sustainable business community, with adequate infrastructure and facilities”* but does not indicate how this will be achieved for non-residential uses.
- 3.12 Policy BE2 seeks to support retail and community facilities ‘within the centre of Oakley’,

indicating that such a boundary is delimited by Station Road therefore precluding use of land to the east of this. Particularly for educational uses the Plan states:

*“The largest single employer in the parish is Lincroft School which also serves several surrounding parishes. Along with Oakley Primary School it provides a prime focus for the community but also is the source of significant traffic issues.”*

3.13 There is no policy provision to recognise constraints on the existing use and capacity at the current school site and associated playing pitch facilities as a key component of community infrastructure requiring upgrade and expansion.

3.14 CMAT supports the recognition of the current and future land use and operational requirements of Lincroft Academy arising from the Examination of the Oakley Neighbourhood Plan, with the proposed designation of the Lovell Road Playing Fields as a Local Green Space having been rejected by the Examiner. The Examiner’s Report records that imposing an additional layer of protection would have unduly limited Lincroft Academy in terms of future uses of the site and notes:

*“The playing fields are separated from the main part of the school buildings and Lincroft Academy wishes to reorganise its land parcels to enable the growth and efficient functioning of the school. In addition, Oakley Football Club has indicated that it is looking for flexibility in case a better site should come forward for the Club’s use. The designation of the site as LGS would limit the future options for the school in that reorganisation.”*

3.15 Notwithstanding the longstanding issues with congestion on Station Road, the Oakley Neighbourhood Plan further notes that the requirements of existing organisations should be considered when assessing future proposals for development. This recognises that fulfilling the provision of community infrastructure (including education and school places) may mean it is not possible to alleviate all traffic issues raised as concerns with the Neighbourhood Plan.

#### **Relationship with the Emerging Plan**

3.16 CMAT would welcome further engagement with the Council regarding the strategic priorities for education associated with the current requirements of Lincroft Academy and future levels of growth in Oakley and surrounding settlements. It is considered essential that delivery of these requirements is supported through the policies and allocations of the Plan.



***Paragraph 8.35 (Evidence Base – Infrastructure Delivery Plan) – Object***

- 3.17 As drafted, these representations consider that the Council's Preferred Strategy Options published for consultation will continue the failure to specifically address the role and requirements of Lincroft Academy. This jeopardises CMAT's ability to effectively deliver the expansion in the Pupil Allocation Number (PAN) required immediately as well as precluding delivery of any future strategy for enhancement and further expansion of the facilities including relocation of the Lovell Road Playing Fields.
- 3.18 This issue principally arises from the failure of the Council to produce any settlement-specific Infrastructure Delivery Plan (IDP) to support consultation on its Preferred Options. Paragraph 8.35 of the consultation document states that this will only be produced once the development strategy has been chosen and infrastructure requirements can be identified. There are three principal issues with this dealt with in the remainder of these representations:
- 1) The requirement to increase the Pupil Allocation Number (PAN) to approximately 240 pupils at Lincroft Academy is a known and immediate requirement and requires support through the Plan's strategic policies in all scenarios. This, however, is an increase upon 'limitations' imposed in planning conditions attached to past planning permissions.
  - 2) None of the Council's Preferred Strategy Options identify further village-related growth at settlements outside of narrowly defined parishes within the A421 corridor. In the case of Lincroft Academy specifically this fails to reflect continued pressure on school places arising from recent and committed development. For the settlement of Oakley, fails to reflect that support for further residential development to optimise the potential for enhancement of community facilities will maximise the potential to contribute towards sustainable development and deliver substantial net gains across the wider strategy.
  - 3) The evidence base provided by the Infrastructure Delivery Plan should be completed in tandem with the review of the settlement hierarchy, whereby these representations endorse Oakley's reclassification as a Key Service Centre to better reflect the important role of Lincroft Academy and to support further expansion of enhancement of the facilities as required in the future.

***Paragraph 1.10 (alignment with the Spatial Framework) – Comment***

- 3.19 The proposed Oxford-Cambridge Spatial Framework will have the status of national policy and is intended to form a material consideration for plan-making alongside the National Planning Policy Framework.
- 3.20 The government is currently seeking view on priorities for the Framework as part of consultation on the document ‘Creating a Vision for the Oxford-Cambridge Arc’ (until October 2021). The latest consultation proposals set out that it will aim to guide sustainable planning and investment decisions under four policy pillars:
- the environment;
  - the economy;
  - connectivity and infrastructure; and
  - place-making.
- 3.21 The Council’s Preferred Options published for consultation contend that they draw heavily on the ‘pillars’ of economic development and the natural environment from the emerging Spatial Framework. The representations identify that the Council’s published consultation proposals fail to embrace the comprehensive approach to supporting sustainable development anticipated in the Spatial Framework. Paragraph 1.10 of the consultation document ignores altogether the place-making ‘pillar’ of the Framework while the Preferred Options as a whole are overly reliant on assumptions regarding improvements in strategic-level connectivity. This fails to embrace local opportunities for sustainable development.

**Reasoning**

- 3.22 It is surprising, and inconsistent with national policy and the emerging objectives of the Arc Spatial Framework, that the consultation proposals make no mention of the connectivity or place-making pillars of the Spatial Framework. Each should be considered of equal importance.
- 3.23 Specifically, paragraph 4.1 of the consultation document ‘Creating a Vision for the Oxford-Cambridge Arc places significant emphasis on reducing the need to travel. Connectivity is not just about strategic road/rail links - it means:

*“improving communities’ access to the services they need – like a good quality, sustainable water supply and broadband, schools, cycle lanes and healthcare, as part of a great approach to place-making.”*

3.24 Paragraph 4.4 also states the importance of recognising the needs of an ageing population in terms of service delivery. At Paragraph 4.5 the document goes on to explain:

*“the policies of the Framework will be used to create a clear infrastructure plan giving communities access to the public services they need – including education and health”*

3.25 The settlement hierarchy in Bedford Borough means that Rural Service Centres and Key Service Centres across the authority have a key role in delivering these requirements for sustainable communities and serving a wider rural hinterland – both in terms of immediate needs and their role throughout the plan period. The strategy in the Local Plan 2030 has deferred important decisions relating to these priorities both in terms of avoiding the reclassification of centres such as Oakley and in placing the requirement to allocate sites upon Neighbourhood Plans. Priorities have therefore not been addressed and in any event the current strategy has only sought to address a foreshortened period to 2030.

#### Remedy

3.26 The Council’s Preferred Options consultation proposals offer no scope to address these local requirements for place-making and connectivity as part of a comprehensive ‘hybrid’ strategy. This is as a result of identifying no requirement for additional village-related growth outside of the ‘east’ or ‘south’ transport corridor parishes. Opportunities for sustainable development in accordance with these requirements (and the objectives of the emerging Spatial Framework) must be embraced both in the period to 2030 (to address the immediate uplift in the need for growth) and across the entire plan period to sustain the role and function of the borough’s most sustainable settlements.

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

### ***Reasoning***

3.27 The draft Vision sets out:

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

3.28 This aspect of the Vision will not be achieved in the context of the Council’s Preferred Options omitting a significant number of the borough’s KSCs and RSCs from the spatial strategy and do not seek to provide for the additional development required to secure balanced communities.

3.29 Theme 4 (Better Places) of the Council’s proposed Objectives for the Local Plan 2040 sets out:

*“Provide appropriate amounts and types of housing to meet the needs of the borough’s urban and rural communities over the lifetime of the Plan making the housing stock more adaptable and resilient*

*Achieve a borough where everybody has appropriate access to high quality health and social care, as well as everyday essential services and community facilities where social and cultural wellbeing are supported, enabling all residents to lead healthy and independent lives.”*

3.30 The principle of these objectives is supported but is reliant on flexibly supporting diverse opportunities for development across the settlement hierarchy. There are a substantial number of centres where the level of development identified is insufficient to secure the opportunities identified or, as in the case of Oakley, to provide for a long-term strategy for improvement of the facilities at Lincroft Academy.

## **4.0 SUPPORT FOR THE REQUIRED EXPANSION OF LINCROFT ACADEMY**

### **(a) Summary of the Expansion Proposals Requiring Immediate Support**

- 4.1 Lincroft Academy has an immediate requirement for expansion to support a Pupil Allocation Number of approximately 240 admissions per annum from 2023. This should be reflected in the policies of the Local Plan 2040. In summary, plans for the works required to achieve the additional intake have been drawn up and the requirement for expansion has been agreed by Bedford Borough Council's Education department.
- 4.2 The Borough Council's Education department has further confirmed with CMAT details of the NOR forecasts necessitating the increase in the Pupil Allocation Number to 240. To our knowledge the evidence base for the emerging Local Plan 2040 makes no reference to these forecasts and the account they take of growth at neighbouring Key Service Centres including Clapham and Bromham and other committed development. It follows that while the current proposals would address the immediate need for expansion it would be necessary for the evidence base for the Local Plan 2040 to consider the potential demand for a further increase in the PAN over the plan period. Annual applications are apparently at or in excess of the Pupil Allocation Number.
- 4.3 This requirement for expansion is not currently reflected anywhere within the policies of the emerging Local Plan 2040, and has not been assessed within the emerging evidence base. The Council's Infrastructure Delivery Plan is not yet available and assumptions within the AECOM Transport Model assume limited growth in housing assumed beyond 2030 in the reference case (which assumes no further growth beyond the adopted Local Plan). For Oakley, this means that the reference case only takes account of development within the Neighbourhood Plan and ignores altogether the settlement's role in providing Primary and Secondary education. The current position of the existing and emerging development plan means expansion will need to be achieved in the context of the existing traffic conditions on Station Road.
- 4.4 Given the background and context of the development plan the strategy to achieve the expansion required within the necessary timescales represents a freestanding development proposal within the existing site west of Station Road. This current approach precludes the wider benefits of incorporating CMAT's interests east of Station Road, considered later in these representations.

- 4.5 The scheme drawn up has an itemised cost of circa £8m. The cost is considered the minimum necessary to achieve an efficient expansion to 240-pupil entry and reflects the absence of any funding strategy previously agreed upon the change of Lincroft Academy's role as a secondary school.
- 4.6 Together with the expansion in teaching and classroom space the scheme drawn up offers some limited improvements for staff parking and an 'Activity Centre' is proposed within the new buildings. The proposals allow for improvement to highways conditions on Station Road.
- 4.7 The plans and proposed funding sources for expansion take no account of relocation or enhancement of the existing sports pitches and are not expected to raise any implications for the ESFA.

**(b) Background to Lincroft Academy and the Requirement for Expansion**

- 4.8 The buildings at Lincroft Academy and Oakley Primary Academy share a single site on land west of Station Road. This is important in the context of the ongoing implementation of school reorganisation across the Borough to provide full primary and secondary education provision (age 4-16 years) within Oakley and the role of the schools in serving the wider rural area.
- 4.9 The evidence base for the Bedford Local Plan 2030 substantially pre-dates the reorganisation of school provision in Bedford Borough. It cannot be overlooked that as part of the change from a two-tier to three tier system Lincroft Academy is the only former Middle School within the North Bedfordshire area, expanded and repurposed to provide secondary education provision for pupils aged 11-16. Oakley Primary Academy, forming part of the same campus, provides education of those aged 4-11.
- 4.10 Middle Schools in a number of settlements have been closed altogether with a total net reduction in the number of schools from 74 to 60. This emphasises the contribution of settlements such as Oakley with a range of education provision to providing services and facilities for the wider rural area.
- 4.11 The recent reorganisation represents a substantial challenge in planning terms, albeit in the first instance change in the role of a school building from providing Middle School to Secondary School facilities is not in itself a change of use requiring planning permission. The wider repercussions of this in terms of extant planning history and the requirements for future

use and development must be considered further. This includes not only meeting the demand for school places but also acknowledging the campus' (Oakley Primary Academy with Lincroft Academy) role as a key employer and provider of wider benefits to the local community.

- 4.12 CMAT is committed to addressing as part of maintaining and enhancing education facilities and outcomes in Oakley itself and across the Borough but notes the absence of any comprehensively agreed funding strategy or development proposals supporting the changes outlined above.
- 4.13 A review of the planning history clearly indicates that there is no application activity associated with the recent school reorganisation to provide full secondary education (age 11-16) facilities at Lincroft Academy. This follows from substantial previous activity to sustain and enhance the facilities available and address growing demand on school places; albeit no explicit planning to support an increase in pupil numbers has been undertaken in recent years. The popularity of the school has been associated with a reactive approach.
- 4.14 In practical terms planning condition no.4 attached to application reference 16/00329/MAF **limiting the pupil roll at Lincroft Academy to 855 pupils** is instructive of how the planning history of the campus fails to reflect the current and future requirements of the site.

**(c) Background to Provision of School Places**

- 4.15 It is agreed with the Council's Education department that NOR forecasts for Lincroft Academy necessitate increase of the PAN to 240 pupils intake at 'year 7' from 2023 onwards. While these forecast are not set out in detail in these representations, data on the number of current pupils at each school and the confirmed intake for the 2019/20 academic year was compiled to support representations to the Oakley Neighbourhood Plan submission (Regulation 16) version consultation in August 2019. The Council's Planning Policy Team therefore has advanced knowledge of the pressure on school places from before commencement of the immediate review of the Bedford Local Plan 2030.
- 4.16 This is important because it provides an insight into overall demand and the ongoing impact of reorganisation. Data for previous years was obtained direct from the Department for



Education's<sup>1</sup> absence and pupil population records to 2017/18.

- 4.17 Failure of either the Local Plan 2030 or emerging Local Plan 2040 to take any apparent account of the Council's own NOR forecasts is a significant deficiency in the context of ongoing reorganisation and forecasts for future housing growth across the borough; including within Key Service Centres and Rural Service Centres. This represents a significant risk at the authority level in terms of ensuring the need for school places is addressed.

**Table 1. Pupil Roll and Forecast – Lincroft Academy and Oakley Primary Academy**

	URN	2014/15	2015/16	2016/17	2017/18	2018/19 <sup>2</sup>	2019/20 <sup>3</sup>
109474	Oakley Lower School	207	205	-	-	-	-
143561	Oakley Primary Academy	-	-	211 <sup>4</sup>	256	295	293
136471	Lincroft Academy	842	852	880	698	682	887
	<b>TOTAL</b>	<b>1049</b>	<b>1057</b>	<b>1091</b>	<b>954</b>	<b>977</b>	<b>1180</b>

- 4.18 The past intake data demonstrates the continued high demand for school places in Oakley and ongoing impact of reorganisation. For example, in 2016/17 the Oakley Primary Academy was still a lower school, i.e., only accommodated pupils up to Year 4, after which point, they moved to a middle school. In 2017/18, the school started transitioning to a Primary School and took pupils up to Year 5. In 2018/19, it became a full Primary School, with pupils up to Year 6. For this reason, there is also some short-term fluctuation in the total number of pupils at Lincroft Academy as the school roll transfers to a secondary education facility. For Lincroft Academy the September 2017 intake (2017/18 data) is based on year 6 to year 9 pupils only).
- 4.19 At the point that the condition restricting pupil numbers at Lincroft Middle School (**855no pupils**) was imposed as part of application ref: 16/00329/MAF Oakley Lower School had a pupil allocation number of approximately 200, equating to 1,055 places in total. It is clear

<sup>1</sup> <https://www.compare-school-performance.service.gov.uk/school/136471/lincroft-academy/absence-and-pupil-population> to 2017/18

<sup>2</sup> Figure at Census Point provided by Sharnbrook Academy Federation

<sup>3</sup> Confirmed pupil intake (September) figures provided by Sharnbrook Academy Federation (SAF)

<sup>4</sup> In the table above, the 211 pupils in 2016/17 should be against Oakley Lower School (the URN changed on 1<sup>st</sup> November 2016 when the school converted to academy status, but it remained a lower school until 31.8.2017).



from the data for 2016/17 that the condition on pupil numbers at Lincroft Middle School was breached in 2016/17, as was a cumulative total of 1,055 across the combined sites.

- 4.20 Due to its sustainable location, it was accepted that provision for up to 290 pupils at Oakley Primary Academy is acceptable in transport terms, as assessed under application ref: 17/03321/DC3. However, it is also clear that the school is already operating at this capacity with significant further growth to be provided for.
- 4.21 Previously confirmed pupil intake figures for Lincroft Academy in September 2019 indicate the increasing demand for places. The full Pupil Allocation Number (PAN) of 210 places was met or exceeded for year 7 and year 8; along with a waiting list of 5 places for additional year 7 students. Each year 7 group is expected to be filled in the future, equating to a total potential pupil roll total of 1,050 pupils across years 7-11. This significantly exceeds the present restriction to accommodate a maximum 855 pupils based on extant planning permission 16/00329/MAF.
- 4.22 Any breach of the extant planning condition should be considered to have adverse environmental consequences in terms of (for example) land use and traffic impacts. It is important that the policies of the development seek to manage and address these challenges, which is not currently provided for within the development plan, which imposes significant restrictions on the development of the campus and surrounding land.
- 4.23 Lincroft Academy also provides 28 further places for specialist education provision as part of its Autistic Spectrum Centre (ASC) reflecting an important dimension of the school's wider role. These pupils are additional to the PAN for years 7-11.
- 4.24 This background informs the current requirement to further increase the PAN to 240 for years 7-11. The following analysis reflects our own review of committed development and does not replicate the Council's own unpublished NOR forecasts.
- 4.25 Data obtained by Lincroft Academy shows the significant role of the school in maintaining the supply of school places for the wider rural area. Table 2 below shows the confirmed pupil roll by year group in September 2019 and indicates all catchment districts which represent the origin location of 25 or more pupils on the total roll:

**Table 2. Lincroft Academy Confirmed Pupil Roll by Year Group and Origin District Catchment (September 2019)**

District	Year 7	Year 8	Year 9	Year 10	Year 11	Total from Districts
Bedford	36	36	24	36	21	153
Biddenham	6	7	4	4	5	26
Bromham	32	45	38	25	36	176
Clapham	56	47	42	39	32	216
Great Denham	12	8	8	0	8	36
Kempston	17	12	8	5	2	44
Oakley	39	30	29	26	27	151
<b>Total Student Yr Group</b>	<b>210</b>	<b>212</b>	<b>173</b>	<b>150</b>	<b>142</b>	<b>887</b>

- 4.26 Lincroft Academy provides the secondary school for the Clapham catchment, while the Bromham catchment offers preference for places at either Lincroft Academy or Biddenham Upper School. This is reflected in the high numbers of pupil on the roll for each year from these catchments.
- 4.27 Both Bromham and Clapham are Key Service Centres within the borough’s settlement hierarchy and are required to provide for the development of up to 500 dwellings as part of the spatial strategy set out in Policy 3S of the emerging Local Plan 2030.
- 4.28 Bedford Borough Council’s Planning Obligations Supplementary Planning Document (July 2013) provides benchmark figures for the increased requirements for secondary school places based on the typical increase in population generated by new development:
- 11-15 year old pupils: 4.2 children/age group/100 dwellings
  - Equivalent to 21 secondary school age pupils (11-15 year olds) per 100 dwellings
- 4.29 The provision of 500 dwellings would therefore be expected to generate around 105 pupils in total, or 21 in each year group. Notwithstanding the potential for demographic change in the existing population, these pupils would be additional to the existing roll. It should also be noted that the total roll in years 9-11 will increase going forward based on Lincroft Academy’s intake reflecting its full Pupil Allocation Number (PAN).
- 4.30 We have assumed that the number of these additional pupils likely to attend Lincroft Academy will be consistent with the existing proportion of the 11-15 year old population that is recorded on the pupil roll in Oakley. We have based this on the proportion of the population

as recorded in the 2017 mid-year population estimates for the Built Up Area of Bromham and Clapham respectively. This is illustrated in Table 3 below:

**Table 3. Local Plan 2030 Related Growth In Secondary Age Pupils – Bromham and Clapham (September 2019)**

District	Year 7	Year 8	Year 9	Year 10	Year 11	Total from Districts
<b>Bromham – Existing Pupils on Roll</b>	32	45	38	25	36	176
<b>Bromham BUA population (mid-2017)</b>	65	60	52	56	61	294
<b>School Roll as % of Bromham Built up Area Population</b>	49.2%	75.0%	73.1%	44.6%	59.0%	59.9%
<b>Bromham Secondary Age Pupil growth (4.2 pupils/age group/100 dwellings) * 5)</b>	21	21	21	21	21	105
<b>Lincroft School increase in pupil roll - BUA % (Bromham)</b>	10	16	15	9	12	63
<b>Clapham – Existing pupils on Roll</b>	56	47	42	39	32	216
<b>Clapham BUA population (mid-2017)</b>	59	54	66	60	64	303
<b>School Roll as % of Clapham Built up Area Population</b>	94.9%	87.0%	63.6%	65.0%	50.0%	71.3%
<b>Clapham Secondary Age Pupil growth (4.2 pupils/age group/100 dwellings) * 5)</b>	21	21	21	21	21	105
<b>Lincroft School increase in pupil roll - BUA % (Clapham)</b>	20	18	13	14	11	75

4.31 Development in-line with the emerging Bedford Local Plan 2030 is therefore likely to generate an additional demand for secondary school places of around 63 pupils from Bromham and 75 pupils from Clapham. These figures are likely to be a minimum, given that in future Lincroft Academy will meet or exceed its current PAN for each year group. Furthermore, the popularity of Lincroft Academy as a choice for feeder schools in the Bromham catchment is likely to increase.

4.32 This demonstrates the role of Lincroft Academy in serving a wider rural catchment and the imperative of ensuring its future requirements can be met to safeguard sustainable

development. This will be in the context of Lincroft Academy regularly exceeding the cap of 855 pupils imposed via planning condition on 16/00329/MAF.

- 4.33 The planning strategy for the increase in the PAN to 240 is required in the short-term to address this increased demand. Depending on the extent to which the Council's own NOR forecasts take account of development within the Neighbourhood Plans at Clapham and Bromham that is not already consented (i.e., over-and-above extant commitments) there is a strong possibility of the requirement to accommodate further increase to the PAN.

## **5.0 PARAGRAPH 1.45 - THE COUNCIL'S APPROACH TO THE ASSESSING SETTLEMENT HIERARCHY: OBJECTION**

5.1 CMAT considers that Oakley's current status within the settlement hierarchy is not reflective of the role and importance of Lincroft Academy and the background to the immediate requirement for expansion. While there is support in principle to deliver an increase in school places within the existing campus under the existing policies of the development plan Oakley's role as a Rural Service Centre is not consistent with an effective strategy for the long-term planning of community infrastructure in this location. The risks associated with the current strategy can be summarised as follows:

- The current issues with Station Road (although potentially not a reason for refusal in themselves) would benefit from knowledge of the ability to deliver highway improvements to be set out in the policies of the emerging Local Plan 2040; and
- Securing wider benefits associated with optimising the playing field situation, which will not be addressed by the current scheme proposals and could be a barrier to further expansion

5.2 The scale and distribution of growth to Rural Service Centres contained in Policy 4S of the LP2030 has not enabled a solution to these issues being provided through the Oakley Neighbourhood Plan albeit there is no prejudice to opportunities to resolve them in future. The Council's testing of strategy options is based on carrying forward the lack of flexibility in providing for a long-term sustainable solution at Oakley in two ways:

- It's Preferred Options exclude the possibility of further village-related growth north of Bedford
- In any event, testing has retained the use of arbitrary figures for Key Service Centres and Rural Service Centres (500/35 units respectively)

5.3 Within this framework there is no reasonable prospect of securing the required transformation in an approach the best addresses the provision of services and facilities at Oakley. Addressing this requires flexibility in the approach to the scale and distribution of growth that reflects the opportunities and capacity at each settlement, which for Oakley is underpinned by evidence supporting its reclassification as a Key Service Centre. This provides the starting point to potentially enable levels of growth and support other improvements and wider benefits commensurate with its existing role and function.

### Reasoning

5.4 The Council's work to justify the selected Preferred Options is at a relatively early stage with

significant ‘gaps’ in the evidence presented – particularly in terms of development timescales, infrastructure delivery and viability. The Council notes, as follows:

- Infrastructure Delivery Plan – to be prepared alongside site allocations
- Settlement Hierarchy (September 2018) – review underway
- Plan-wide Viability Assessment – yet to be commissioned

- 5.5 The absence of these documents, and in-particular completion of the review of the Settlement Hierarchy, means that the exclusion of Oakley from the Council’s Preferred Options can be demonstrated to be unsound – not effective, not consistent with national policy and not justified.
- 5.6 The council’s approach to the assessment of the existing settlement hierarchy is flawed as it fails to consider the proximity of services and facilities in neighbouring areas which fall within the prescribed distances. This is particularly relevant for Oakley, which is well positioned to take a greater level of growth given its inherent sustainability and the options for development available.
- 5.7 Oakley is a highly sustainable location and appears wrongly classified by the Plan, notwithstanding our broader concerns over the apportionment of housing numbers and the deferral of site identification to Neighbourhood Plans. Oakley is very well connected to both Clapham (a Key Service Centre some 600 metres distant) and Bedford and is well served by public transport.
- 5.8 Oakley includes local shopping, significant employment opportunities and has both a Primary and Secondary School. As such, Oakley serves a wider catchment area and, in this context, it is a reasonable alternative to consider a higher level of growth than the 25-50 homes band proposed under the adopted plan.
- 5.9 The key issue with the council’s approach is that only limited weight was given to the provision of secondary education, as opposed to primary education in developing the evidence base for the Settlement Hierarchy.
- 5.10 Oakley Primary Academy and Lincroft Academy also generate significant local employment opportunities both presently and in view of the expansion required. This includes around 80 Full-time staff (including teaching and support staff) and at least 50 Part-time roles (including caterers and cleaners), with the vast majority now operating from the campus following the

lifting of Coronavirus restrictions. The provision of jobs in each settlement is given no weight in the Council's scoring of the Settlement Hierarchy and overlooks this as an important aspect of providing for sustainable communities.

- 5.11 As a consequence, the finding on Oakley's function as a Rural Service Centre is flawed, particularly as the relationship between additional housing growth and improvements in education provision should form a consideration when determining settlement status and ability to provide for housing growth.
- 5.12 The shortcomings of this finding are exacerbated because strategic priorities relating to the requirements for social infrastructure (notably education) were deferred rather than dealt with in the Local Plan 2030. This is contrary to the requirements of national policy (NPPF2021 paragraph 20(c)).
- 5.13 The current development plan (including the Oakley Neighbourhood Plan) makes no provision for the expansion of Lincroft Academy that is required and is a function of the growth that the current spatial strategy supports across other Key Service Centres without Secondary School provision (including Clapham and Bromham).
- 5.14 Addressing these current unmet strategic priorities together with providing a positive approach towards the longer-term requirements for school infrastructure would be most effectively supported by reclassification of Oakley's role in the settlement hierarchy to reflect its importance to the wider rural area (and strong links to the urban area).

#### Remedy

- 5.15 An appropriate remedy for this would be to complete a review of the preferred options within the Local Plan 2040, treat Oakley specifically as a Key Service Centre and recognise that the area has missed out on potential growth to meet key infrastructure requirements as part of the approach to preparation of the Local Plan 2030.



## **6.0 INDICATIVE LAND USE PROPOSALS EAST OF STATION ROAD (SITE ID: 839 / 832)**

### **Introduction to Site and Proposals**

- 6.1 This section of the representations should also be read alongside submissions on behalf of Bedfordia Property and the Bedfordshire Charitable Trust relating to the wider development opportunity on land East of Station Road.
- 6.2 These representations confirm that CMAT support in principle indicative land-use proposals for a 'one-site' solution incorporating land East of Station Road within the Lincroft Academy Campus through the creation of a self-contained educational campus allowing for the relocation of existing sports pitches, facilitated by the joint promotion of the land. The objective of jointly promoting the land, for the purposes of CMAT's interests, reflects the opportunity to, principally, provide for the relocation and enhancement of the Playing Field facilities and other operational improvements to the school including a creation of a dedicated school access and parking/circulation space.
- 6.3 Submission of these representations reflects that negotiations between the parties are advanced, ongoing and expect an agreement that will satisfy the Education and Skills Funding Agency regarding the enhancement of facilities to be achieved, retain the support of other stakeholders (including Sport England), and recognise the wider benefits of developing the larger site.
- 6.4 Details of an indicative layout making provision for these improvements and wider benefits is included at Appendix 1.
- 6.5 In terms of the enhancements to the Lincroft Campus facilitated through the inclusion of CMAT's interests as part of the land promoted East of Station Road there is further potential to address well documented issues and deliver the following benefits:
- 1) The creation of a new, self-contained Lincroft Academy campus (comprising both primary and secondary schools) with the existing school sports facilities, which are separated from the school at present, being moved onto land directly opposite the school, thus increasing convenience and safety, and pre-school provision. These will be re-modelled and new, modern, all-purpose facilities will be created with an indicative scheme comprising:



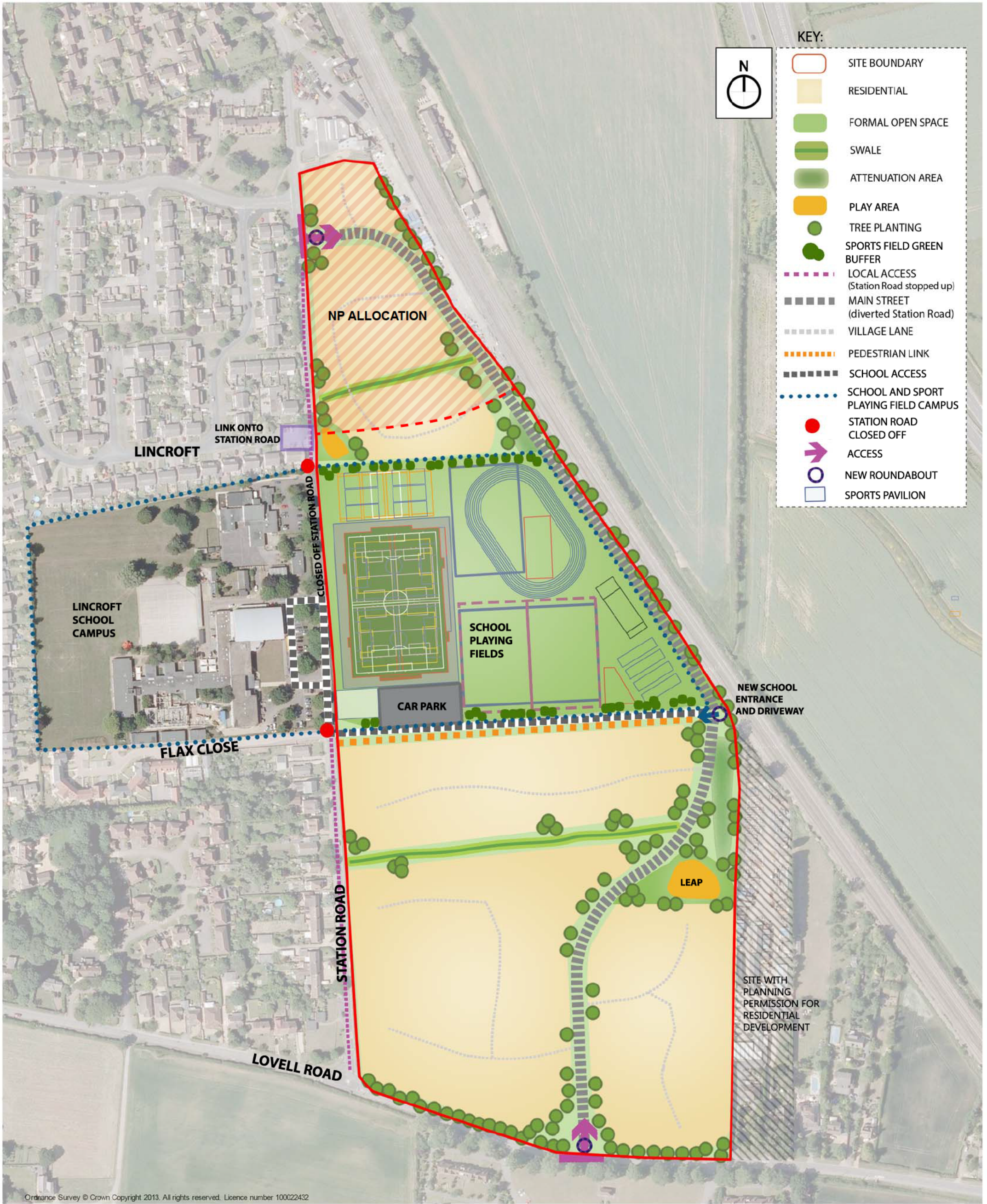
- Playing fields;
- Multi-purpose artificial sports pitches;
- Athletics track;
- Sports pavilion;
- Extensive new parking and circulation area; and
- Changing and sports teaching/admin facility.

2) The stopping up of Station Road north and south of Lincroft Academy and provision of a new road around the perimeter of the site. A new, traffic managed through route would be created on the eastern periphery of the site, which would also provide for the creation of a new dedicated school entrance drive and would also serve as a development access road and serve the new housing area. In doing so, traffic would be externalised and existing issues of school traffic, parking and associated congestion on Station Road would be removed.

- 6.6 The ability to secure the basis for these future enhancements within the policies of the Bedford Local Plan 2040 is essential for the requirements of soundness in order to ensure that the strategy is effective and consistent with national policy with respect of supporting community infrastructure and would be welcomed by CMAT.
- 6.7 Making provision for these enhancements within the development plan would also enable future-proofing of the longer-term role and requirements at Lincroft Academy and would be essential to facilitate any further expansion. These opportunities can be secured , alongside the wider benefits associated with the indicative land use proposals (incorporating residential development, open space, and landscaping).
- 6.8 The prospect of any further expansion must be properly assessed and set out in the evidence base of the Local Plan 2040, taking account of present levels of demand and future growth expected from the selected strategy option. Given that the Council's current Preferred Options place significant reliance on large-scale strategic growth with longer development timescales allowance should also be made for the additional development on uncommitted sites potentially affecting the Lincroft Academy catchment in order to maintain a five year supply of deliverable sites over the plan period.

## **Appendix 1 Land East of Station Road, Oakley – Indicative Masterplan Proposals**





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CLIENT  Bedfordia	Date	08.12. 2015	OS Ref.	501478,253364	Drawn By	SK
	Scale	1:2500 @ A3	Drawing no.	SK09B	Checked By	MEH
	Job no.	BE1564-2	Rev.	B		
PROJECT  Land at Station Road, Oakley	DRAWING TITLE  Masterplan Concept		<b>be1 Architects</b> 5 Abbey Court, Fraser Road, Priory Business Park, Bedford MK44 3WH  Tel: 01234 261 266 Fax: 01234 831 437 Email: enquiries@be-1.co.uk Web: www.be1architects.co.uk  <small>Offices also at: Bristol, Cardiff, East Midlands, Leeds,          London, Milton Keynes and Sheffield</small>			







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