



Phillips Planning Services Ltd.
Town Planning and Development Consultants

RESPONSE PAPER TO BEDFORD BOROUGH COUNCIL LOCAL PLAN 2040 – DRAFT PLAN CONSULTATION

**ON BEHALF OF COUNTRYSIDE PROPERTIES (UK) LIMITED -
PROMOTING LAND WEST OF THE VILLAGE OF GREAT
BARFORD SOUTH OF THE A421 (SITE 878)**

AUGUST 2021

1.0 INTRODUCTION

1.1 The following paper has been prepared by Phillips Planning Services on behalf of Countryside Properties (UK) Limited in response to the Bedford Borough Local Plan 2040 – Draft Plan Consultation.

1.2 Phillips Planning Services are Town Planning And Development Consultants based in Bedford. Our contact details are:

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1.3 Countryside is a leading UK developer with over 60 years’ experience specialising in building communities and creating homes and urban spaces that people want to be a part of.

1.4 They have a proven track record of bringing forward new homes and their expertise has been recognised and celebrated with numerous awards, including ‘Large Housebuilder of the Year (2017)’ at the Housebuilder Awards.

1.5 Countryside believe placemaking is not just about geography. It’s about a feeling and a sense of community. A place to us is as much about the meaning as it is the physical building.

1.6 Countryside are the sole promoter of Land West Of The Village Of Great Barford South Of The A421 (Site 878). This land is available for residential and commercial development and provides an opportunity for strategic development on the A421 growth corridor.

1.7 This paper will provide our clients’ comments on the following documents:

- Local Plan 2040 – Draft Plan Strategy Options And Draft Policies June 2021
- Development Strategy Topic Paper June 2021
- Draft Sustainability Appraisal Report

1.8 An updated “call for sites” submission accompanies this response, and is provided to Bedford Borough Council, to reflect the current vision following on from the Neighbourhood Plan. This submission includes an updated site plan, Vision Document and Masterplan.

1.9 The response paper is set out as follows:

1.0 Introduction

2.0 Land West Of The Village Of Great Barford South Of The A421

3.0 Response To Draft Plan Strategy Options And Draft Policies

4.0 Response To Development Strategy Topic Paper

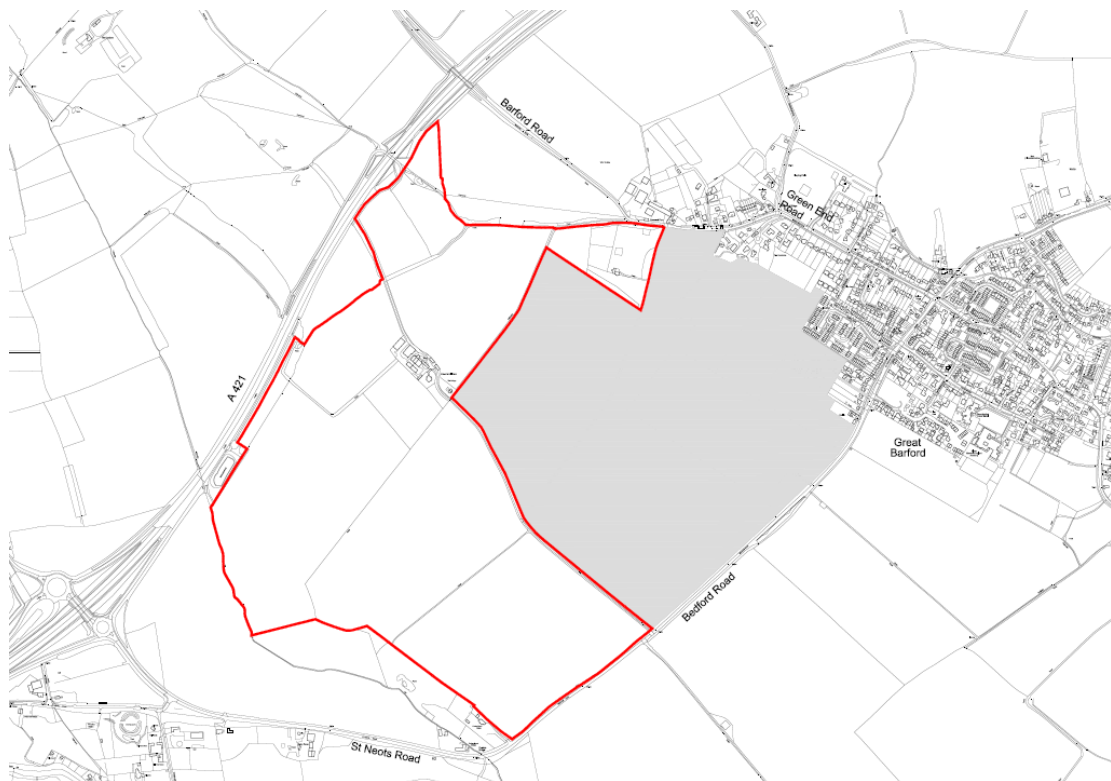
5.0 Response To Draft Sustainability Appraisal Report

6.0 Summary



Appendix A – Countryside Sustainability Approach

2.0 LAND WEST OF THE VILLAGE OF GREAT BARFORD SOUTH OF THE A421

2.1. The site - Land West Of The Village Of Great Barford South Of The A421 is being promoted as part of the Call For Sites process (Site 878).



Location Plan

Extent of site	
Extent of Neighbourhood Plan allocation	

Key

- 2.2. The site is located to the west of Bedford Road on the edge of Great Barford. Great Barford is a Key Service Centre benefiting from a range of services and facilities.
- 2.3. The land we are promoting in this submission is in addition to land under option that we are already promoting in the emerging Neighbourhood Plan. As can be seen in the above plan, this site adjoins the draft allocation for 500 dwellings in the emerging Great Barford Neighbourhood Plan, which is currently being examined by an

independent examiner following the Regulation 16 stage consultation. It is projected that the plan will be at referendum around October 2021.

- 2.4. It is not clear yet whether the whole of the (draft) allocated site will be required to meet the policy requirements of the Neighbourhood Plan, but if it is not all required, then any remaining land would be available for future growth at Great Barford/can integrate with any development with the current allocation.
- 2.5. The land could deliver an additional 500 dwellings or more, in addition to the new homes and community facilities being brought forward through the Neighbourhood Plan.
- 2.6. The site is within the Oxford to Cambridge Arc and has excellent links to the A421. Access to any development will be provided off Bedford Road which will allow traffic to access the A421 without the need to travel through the village.

3.0 RESPONSE TO DRAFT PLAN STRATEGY OPTIONS AND DRAFT POLICIES

3.1. This section sets out Countryside Properties (UK) Limited's responses to the relevant sections in the Draft Plan Strategy Options And Draft Polices consultation document.

Vision And Objectives

3.2. The Vision sets out general planning aims, and we have no particular comments to make on the Borough becoming more sustainable, the delivery of good design, or improved transport options etc. However, it is surprising that the Vision does not make any stronger statements on growth, where it will be located, or make a commitment to delivering the required number of new dwellings, and employment land as identified in the remainder of the Draft Plan.

3.3. Given the emerging focus on the delivery of the Oxford - Cambridge Arc as identified in the document, and the current consultation on priorities for the Spatial Framework, it seems a missed opportunity for the plan not to take a lead in setting out how it could play an important role in delivering the vision. The statement at paragraph 1.11 appears to read as “*we will do what we have to*”, rather than seeking to embrace the ambitions that Government has for development within the Arc.

3.4. In particular it would seem sensible for the plan to make some provision for the possibility of an uplift in housing and employment growth that may emerge through the preparation of the Arc's Spatial Framework. The current consultation on “Creating a Vision for the Oxford-Cambridge Arc”, states that the Government is:

“concerned about the affordability and availability of housing in the Arc, and what this will mean for the Arc's communities, economy and environment. Development of new homes is already happening in the Arc, but in the main centres this has not kept up with need. We also know people are being priced out of the area, increasing the need to make more polluting journeys for work and leisure, and making home ownership less likely for many.”

Our emphasis

3.5. At paragraph 5.8 of the consultation, it adds:

“In parallel to the development of the Spatial Framework, the government is also exploring options to speed up new housing and infrastructure development in the Arc to help meet its ambitions, where evidence supports it. This includes examining (and where appropriate, developing) the case for new and/or expanded settlements in the Arc, including options informed by possible East West Rail stations between Bedford and Cambridge and growth options at Cambridge itself.”

Our emphasis

While it is acknowledged that the Local Plan review and the Spatial Framework will be prepared in parallel, it is clear that the emerging vision is targeting a more advanced and robust form of growth. Therefore, for the Plan to be “positively prepared”, we would contend that the Local Plan Review should allow for some uplift whether that be 10 or even 20%. If the Spatial Framework is adopted at the same time as the plan, there is likely to be the added pressure to consider another urgent review to keep pace with the changing policy context, therefore allowing for some uplift would pre-empt this and help towards reducing the burden going forward.

3.6. This important point is supported by updated guidance in the revised National Planning Policy Framework (2021); and, while it is accepted that this Consultation was developed in advance of the publication of the revised Framework, we must highlight that under paragraph 22 it states that where Local Plans are to include new settlements or significant extensions to towns and villages, then it should be set within a vision which looks at least 30 years ahead. As the transitional arrangements at paragraph 221 of Annex 1 confirm this applies to plans that have not reached Regulation 19 stage; then, no matter which strategy is chosen, the Bedford Local Plan 2040, must expand its “vision” to set out how it will accommodate growth beyond 2040 and deliver on the ambitions of the Arc.

3.0 Growth And Spatial Options – Paragraphs 3.4 and 3.5

3.7. The current housing need requirements of 970 dwellings per annum were based on a previous housing needs methodology which was allowed to proceed on the basis that the Local Plan 2030 was submitted and examined under the procedures of a former

version of the NPPF. The late adoption of the Plan, and the reduction of the plan period from 2035 to 2030, resulted in the Inspector imposing a requirement for the Council to undertake and submit a review of the Plan for examination within three years of its adoption, (Policy 1 – Reviewing The Local Plan 2030).

- 3.8. It is therefore explicit that the Council needs to consider the review in the context of an elevated housing requirement as set out in the Standard Methodology. The Council must therefore address this shortfall in this Review. If this is not adequately addressed throughout the earliest stages of the plan period, then there is danger that there will be a shortfall to meet demand, along with the commensurate need for affordable housing.
- 3.9. It has long been stated that there is need to deliver a step change in housing delivery, but this has never been more apparent than the comparison of the previous objectively assessed housing need, versus the need identified in the standard methodology. This uplift in housing numbers, as well as employment land provision, needs to be targeted from the point of adoption, and not, as has been implied in the text, pushed back five years via stepped trajectory. This approach will undoubtedly compound the problem and will create a far greater burden on delivery between 2030 and 2040.
- 3.10. Paragraph 3.5 infers that additional growth will not be delivered until infrastructure relating to the Black Cat junction and the East West Rail section are complete. However, this is unrealistic and fails to meet the required need of the step change in delivery at the point of adoption. Growth needs to be planned for in a manner which starts to deliver at the point of adoption, and the strategy needs to deliver a range of sites in a range of locations to meet the need. Strategic Infrastructure development will progress at its own pace and will emerge in parallel with the delivery of new housing and employment opportunities. There is an opportunity to accelerate development through the current allocated site at Great Barford west to ensure that there is sufficient supply of new homes into the new Local Plan period.

3.0 - Growth Options 2a, 2b, And 2c

- 3.11. We support the proposed growth along the A421 corridor. This accords with the Government's strategy of delivering a growth corridor between Oxford and Cambridge which includes the building of one million high quality new homes, and

over one million new jobs across the corridor by 2050, in order to maximise the areas economic potential.

- 3.12. However, although the four growth options being consulted upon all include the A421 corridor, only Option 2d includes the eastern parishes and fully explores the potential of this corridor and its settlements to accommodate growth. We contend that the eastern parishes should be included in the selected growth strategy otherwise an important part of the Oxford To Cambridge arc, namely the villages around the Black Cat interchange, will be left out. The eastern area of the corridor includes several sustainable settlements including Key Service Centres, all with good links onto the A421 and the A1. Allocations should be made across the entire corridor to ensure its economic potential is maximised.
- 3.13. We therefore raise objection to Growth Options 2a, 2b, and 2c as they have omitted a crucial part of the A421 corridor, and wish to elevate option 2d as the preferred option for growth to maximise the delivery of new homes through the sites allocated in the current local plan
- 3.14. In respect of those options reliant on the delivery of either one or two new settlements, our clients would argue that the Borough should be cautious in relying upon such a strategy to meet the required delivery rates for housing. As the Borough Council know from their experience with the Wixams, new settlements are difficult to deliver and take time to start making a contribution. New settlements can be part of the strategy, but a realistic view, a cautious view should be taken on the rate of growth these proposals can deliver, and plan accordingly.
- 3.15. In contrast urban and village extensions with one landowner and direct access to the existing highway network can deliver much quicker within the plan period, but are big enough to deliver new infrastructure in the form of schools and community facilities. Our client's land in Great Barford offers that potential, is large enough to accommodate new strategic growth while having the land to deliver the necessary infrastructure. It can also build upon the current release of land at Great Barford West, as well as take advantage of the ability of the existing Primary School to accommodate expansion. A further 500 dwellings would take the education requirement at Primary level to a 3-form entry. We would argue there is sufficient capacity to achieve that and a 3 form entry primary school is of an appropriate size to deliver high quality education provision.

3.0 - Growth Option 2d

- 3.16. Of the selected growth options, our client's support growth Option 2d which seeks to distribute growth along the entire A421 corridor. This option will contribute towards the Government's strategy of delivering a growth corridor between Oxford and Cambridge.
- 3.17. Great Barford is the largest settlement in the eastern parishes, and a Key Service Centre and it would therefore be logical that it be proportionally allocated the larger share of the identified growth.
- 3.18. We would also state that the quantum of development identified in option 2d is too low and would not fully utilise sustainable sites available within the eastern parishes, particular in Great Barford, where our client's control land suitable for a further 500 dwellings or more and directly adjoining the high frequency bus route provided by the X5 linking between Milton Keynes, Bedford and Cambridge. Countryside have experience of procuring new bus services and routes through direct engagement with bus providers such as Stagecoach and First.

4.0 – Site Allocations And Call For Sites

- 3.19. Countryside Properties (UK) Limited controls land along Bedford Road, known as Land West Of The Village Of Great Barford South Of The A421, which is being promoted through the Call For Sites process (Site 878). This land is in the control of a single promoter and can easily deliver further growth.
- 3.20. The site we are promoting adjoins the land allocated for 500 dwellings in the Draft Neighbourhood Plan under Policy H1 – Great Barford West. However, there is a probability that not all of this allocated land is required to meet the objectives of Policy H1. The remaining land within the allocation as well as the adjoining land to the west and north, and heading out to the A421, is also available for development and could provide further strategic growth in this location, ensuring there is a continued supply of new homes into the new local plan period. This is a highly deliverable site and would be seen as a logical extension to the village following the Neighbourhood Plan development, and could deliver an additional 500 dwellings or more, furthering the objectives of the Neighbourhood Plan to deliver new community facilities for the village.

- 3.21. As previously identified, the site is within a highly accessible location on the A421 growth corridor and is therefore in an ideal location for such development which will act as a draw into the Borough and increase the value of the local economy. Matters such as highway mitigation can be resolved through engagement with key stakeholders and Countryside is responsible for the delivery of significant elements of infrastructure within their strategic sites.
- 3.22. Land at Great Barford West will be served by new infrastructure including, utilities, roads, footpaths, cycleways, open space, education, and health and community facilities. There is an opportunity for further growth in the wider site which builds upon this infrastructure, contributing towards delivery.
- 3.23. Another benefit of this site is it that it can connect to the A421 to the west, without the need for traffic to go through the existing village. This means that new housing and employment can be delivered and accessed without resulting in an adverse impact on the existing village road network, and would be particularly beneficial during the construction phase.
- 3.24. The development of Land West Of The Village Of Great Barford South Of The A421 would support the delivery of growth within the A421 corridor, be close to the route of East-West Rail, and would clearly comply with the ambitions of delivering development which corresponds to strategic connections within the Oxford-Cambridge Arc.

Policy E15 – Amount And Distribution Of Employment Development

- 3.25. We support the policy of creating a minimum of 8,642 net additional jobs up to 2040. A reasonable proportion of this growth should be facilitated along the A421 in line with the Governments objective of providing over a million jobs across the Oxford – Cambridge Arc by 2050.
- 3.26. Land West Of The Village Of Great Barford South Of The A421 (Site 878) has excellent links onto the A421. Small scale employment provision in this location would further enhance the sustainability of Great Barford as a Key Service Centre.

Policy SB1 – Self Build And Custom Housebuilding

- 3.27. The objective of this policy can only be delivered if there is a reasonable and proportionate distribution of growth along the corridor in desirable places where a

need is identified on the Self Build Register. If development is too narrowly focused around the urban area, such as indicated in option 2a, then policy SB1 will result in an over provision of self build plots in and around the urban area. The Government's objective in bringing in the self-build requirement was for that untapped part of the sector to start making a contribution towards housing delivery.

- 3.28. This means that self-build plots should be provided where they are wanted, and as the register shows a broad range of desirable locations, if the objectives of SB1 are to be realised, then a commensurate range of sites should be provided.

4.0 RESPONSE TO DEVELOPMENT STRATEGY TOPIC PAPER

- 4.1 The settlement of Great Barford was included in many of the options (2d, 3b, 3c, 4, 6, and 7) in the Issues And Options Consultation June 2020, with many of the options allocating 500 dwellings to the settlement in the next plan period; with option 2d identifying some growth to the area but no specifics.
- 4.2 As Great Barford is only now included in one of the four options being consulted upon – Option 2d, we must raise objection and highlight that the exclusion of strategic growth of Great Barford is a missed opportunity; and that the reasoning given in the sustainability appraisal for discounting this level of growth are considered superficial and indicate an underlying bias towards urban centric growth.
- 4.3 It is important to note that many of the options were not discounted due to issues with allocating growth to Great Barford itself, but because there are considered to be issues with the overall strategy in those particular options. For example, Option 7 was discounted because the required level of growth cannot be achieved. It is therefore crucial that Great Barford is not discounted as a suitable settlement for growth simply because it happened to be one element of an overall strategy in options which are considered to be less desirable. We would strongly contend that the sustainability credentials of Great Barford should be considered on its own individual merits.
- 4.4 Great Barford is a Key Service Centre and a sustainable settlement in a major strategic location on the Oxford To Cambridge Arc. It is an ideal location for delivering further strategic growth in this Local Plan Review. Countryside are delivering other strategic sites within the Oxford to Cambridge arc such as at Bourn airfield (3500 new homes) and have experience of working with a range of stakeholders to address cross boundary matters.
- 4.5 Option 2d in the consultation is the only option which includes all of the A421 corridor on the Oxford To Cambridge Arc. Given the Government's objectives for the arc and the strategic importance of this location, and the fact that Great Barford is the most sustainable settlement in the eastern parishes, it is considered crucial that it be included in the final strategy taken forward

5.0 RESPONSE TO DRAFT SUSTAINABILITY APPRIASAL REPORT

- 5.1 We raise objection to the contents of the Sustainability Appraisal. The framework for considering sustainability is well established, and we do not raise objection to the general scope of the appraisal. However, it is felt that there is an underlying bias towards urban centric growth, which discounts further growth in the Key Service Centres and smaller sustainable villages.
- 5.2 The four options in Option 2 are described in the consultation as primarily an urban centric set of options focused on growth in and around the urban area, and rail connection points. We would argue this approach is far too simplistic and omits an opportunity to enhance the sustainability of Key Service Centres through the provision of additional services and employment opportunities. It also ignores the potential to build upon the community-led ambitions of the many Neighbourhood Plans that have been prepared in the Borough
- 5.3 We would comment that at paragraph 8.10, the Council comment on merits of growth around rail hubs and yet ignore to a large extent the value of the bus network with high frequency bus services being a far more flexible and viable option to providing an alternative to the car. The delivery of housing growth along the high frequency bus network, such as that served by the X5, has the knock on benefit of supporting improvements to services and wider improvements to sustainability across a broader range of settlements.
- 5.4 An enhanced population along the bus network increases passenger numbers which enables improvements to those existing services to be more viable. By enhancing the network as a whole, you can better serve smaller settlements and improve their sustainability as a consequence. We would highlight again that Countryside has significant experience of procuring additional bus services through their developments in collaboration with local services and ensuring they become viable.

- 5.5 We would also highlight that sustainable development needs to plan for the longer term. The private motor vehicle/car is considered to have a harmful effect on the environment, contributing to rising CO2 levels and poor air quality. As a consequence, the language of sustainability talks about “reducing the reliance on the private motor vehicle”. However, as we progress forward in carbon neutral/zero emissions vehicles, this notion will be out of date. The Government has brought forward it’s ban on the sale of new petrol and diesel cars to 2030, with all new cars and vans required to deliver zero emissions from the tailpipe from 2035. The car industry has also reacted with many car manufacturers already committed to being fully electric by 2035. As well as the largest manufacturers such as Volkswagen Group committed to their vehicles being carbon neutral at the point of manufacture.
- 5.6 With the move towards more environmentally friendly forms of private transport which are driven and supported by the ever-growing energy provision coming from renewable sources, the impact of the private motor vehicle will change, and will be part of a range of sustainable transport options.
- 5.7 We would also raise objection to the very narrow view that somehow sustainability can only be achieved by one model of growth, with a focus on what is new, being located in only a select few locations; and that somehow everything else is not sustainable, nor could ever be altered to being sustainable. In our view it ignores the wider objective of enhancing the sustainability of existing settlements of all sizes, and fails to support the long-term vitality and viability of those existing settlements and the services and facilities they rely upon.
- 5.8 It also assumes that travel patterns will continue to grow along the same trajectory, but our collective experiences through the Covid19 pandemic have accelerated the trend of home working supported by advancements in technology. As demonstrated by the pandemic, a large portion of the economy can continue to function without the need to travel, and to some extent has opened people up to embracing technology and minimise their need to travel to communicate. All development needs to consider, that going forward, a greater proportion of people will be working from home or in localised hubs without need to travel long distances. That degree of flexibility is already coming in in the form of communal work spaces, and hot desking etc. Therefore, the provision of high-speed broadband to all new developments, as well as supporting enhancements to the existing network, is essential in delivering sustainable growth.

5.9 We would therefore conclude, by arguing that the sustainability credentials of the settlement of Great Barford should be assessed independently, and the opportunities for growth in the settlement fully considered in light of its sustainability credentials. It is self-evident that Great Barford occupies a sustainable location, served by A421 at the junction with the A1, and is supported by high frequency public transport links via the X5 and 27 bus services. The settlement is independently accessible from the major road network, and within short distance of a major employment area on the eastern edge of Bedford, with existing pedestrian and cycle connections into the town. We believe that the allocation of development at Great Barford would meet many of the sustainability objectives the Council are arguing in support of options 2a – 2d, and as such would question why strategic growth here has been discounted. Countryside takes its responsibilities as a sustainable developer very seriously and have a number of strategies to ensure we meet these objectives and continue to monitor progress (sustainability approach document attached at Appendix A).

6.0 SUMMARY

- 6.1 This paper provides specific responses on behalf of Countryside Properties (UK) Limited to the Bedford Borough Local Plan Review – Draft Plan Consultation.
- 6.2 The responses provided intend to constructively contribute towards to the plan making process.
- 6.3 It is particularly highlighted that the requirement for the review relates to delivering central government's ambitious growth objective for the Oxford – Cambridge. It is considered that providing for growth in and along the strategic routes through the arc (e.g. the A421 corridor and East-West Rail) would make a key contribution to the achievement of this objective.
- 6.4 In parallel to this submission, Countryside Properties are promoting Land West Of The Village Of Great Barford South Of The A421 (Site 878) which is well located in this context. This land is available for residential led mixed use development and provides an opportunity for strategic development on the A421 growth corridor that builds upon the allocation chosen through the Neighbourhood Plan process. .
- 6.5 We respectfully request that our comments are taken into account in the preparation of the Draft Local Plan 2040.

APPENDIX A

COUNTRYSIDE SUSTAINABILITY APPROACH



PUTTING PEOPLE AT THE HEART OF OUR HOMES

Our approach to sustainability



COUNTRYSIDE
Places People Love

INTRODUCTION

In a year of upheaval where our bedrooms and kitchens became our offices and our local area became our entire world, it has never been more important to create places people love. Places where we can connect with the nature on our doorstep. Places where people have access to community, local shops, schools and other essentials. For Countryside, that also means playing our part to respond to the big challenges that go beyond our business; the challenges that can affect the health and happiness of our people, our communities and our environment.

To do this, we have set a clear vision of what we want to do and developed an approach to sustainability that is focused, ambitious and most importantly, impact-driven.

We have looked closely at where we make the most impact as a business on our communities, society and the environment and have worked with our people, partners and investors, to make sure we focus our efforts in the right areas. In the development of this approach we have identified the United Nations Sustainable Development Goals (SDGs) where we can make the greatest impact. The result of the assessment can be found on page 9, linked to our commitment and targets.





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THE CASE FOR CHANGE

The world is changing and so are we.

Creating places people love is what we do, day in, day out. But in a world that's changing rapidly, this isn't always easy. So how do we create places people love while securing a better future for us all?

The built environment - the buildings, parks and infrastructure - which support our daily lives have a big impact on the natural environment and on our health.

We know that we're facing some big challenges - from the loss of wildlife habitats to the quality of the air we all breathe. We all have an important role to play in combating these challenges and our vision is for every act of planning, design and construction to make the world a better place.

We're not there yet and we still have lots of questions to explore and solutions to uncover but we've made a start by looking at where we have the most impact as a business - in relation to our communities, society and the environment - and working with our people, partners and investors, to make sure we focus our efforts in the right areas.

The foundations of our approach to sustainability are built to last, guided by our values of caring, growing together, and pride, to always deliver what we promise. Our renewed purpose of creating places that people love with sustainable communities in mind can help us thrive together.



A FOCUS ON OUTCOMES

Our vision for the future is that every act of planning, design and construction we do helps to make the world a better place. To do that, we must first get to grips with the challenges we face - globally and locally – and understand the role Countryside plays in addressing them.

We don't have all the answers yet, but we're committed to working together with our partners, local communities, supply chain and others to tackle these complex and interconnected challenges head-on.

That's why our approach to sustainability is focused on delivering three key outcomes: **constructing quality homes that are built to last, leaving a positive legacy in the communities where we work, and helping our people to thrive.**

PLACES PEOPLE LOVE

To create places where people love to live, with sustainable communities built to last.

BUILT TO LAST

We will take pride in efficiently and responsibly building **45,000 new sustainable homes by 2025.**

SUSTAINABLE COMMUNITIES

We will work with our partners to deliver sustainable communities that will enhance the quality of life of **over a million people by 2030.**

THRIVING TOGETHER

By 2025, all our people will feel they are thriving in an inclusive and rewarding workplace, **committed to creating places people love.**



PUTTING THE ENVIRONMENT ON EVERYONE'S AGENDA

BUILT TO LAST

At Countryside, we take pride in everything we do to make places and communities that people love. For us, this means making sure that we plan, design and build spaces and places that are built to last; places that are beautiful, functional, connected and resilient.

By 2025, our ambition is to efficiently and responsibly build 45,000 new sustainable homes, and to deliver those homes in the right way, the Countryside way.

To achieve our ambition, we will be:

Building Responsibly – Making sure that we continue to improve our safety performance on site, being considerate constructors, and ensuring that the materials and labour we use on site is ethical. We take a long-term approach to safety that aims for incident and injury free operations with a commitment to achieve at least a 10% better score than the Health and Safety Executive (HSE) National Injury Rate and Home Builder's Federation Incident Rate per year.

Building Efficiently – Capitalising on our nearly £30m investment in modular timber frame capabilities as well as our open panel timber frame factory to respond to the significant housing shortage in the UK, while also significantly reducing our construction waste as well as the embodied carbon in our homes. We are also committed to transitioning our operations to be as low-carbon as possible and will be establishing Science-Based Carbon targets in the summer of 2021.

Building with Pride – Ensuring that every home we build is high-quality, efficient and comfortable. We must make sure that we are delivering a consistently good service to our customers, partners and local communities. To support us, we have set an ambitious target to undertake building performance evaluations on 1,000 of the homes we build by 2025 to ensure that what we actually build is as efficient, easy to run, and healthy as we designed it to be.

To find out more about the eight targets we've set to help ensure our homes and communities are built to last, please see page 9.



A photograph of two women sitting at a table. The woman on the right has curly hair and is smiling while looking at a document she is holding. The woman on the left has straight hair and is looking towards the first woman. They appear to be in a meeting or collaborative work environment.

PUTTING SPIRIT BACK INTO COMMUNITY SUSTAINABLE COMMUNITIES

We really care about our customers, partners, local communities and everyone who is impacted by the work Countryside does to build homes and new communities. We know that the decisions we make can have a big impact on people and the environment. By listening to, and working together with, our customers and local stakeholders we can build communities that are healthy, happy, connected and beautiful. For us, sustainable communities mean thinking in generations, not decades. We want to go beyond constructing buildings to thinking about the infrastructure needed to support our communities today and tomorrow and how we can really create places that people love to live for years to come.

By 2030, we aim to work with our partners to deliver sustainable communities that enhance the quality of life for over a million people.

This is a big challenge, but we are putting in place a suite of programmes and targets to help us ensure that our work creates a positive legacy. Over the next 5-10 years, we are focusing on three key areas:

Embracing the community – Engaging with our local communities and partners is critical to every single project we deliver and to truly address the local needs and aspirations. We learn so much from our engagement activities that we are committing to undertaking three post-occupancy evaluation studies per year, so that we can continually listen and learn.

Creating nature-rich and healthy spaces – During the pandemic, it became clear that access to nature and the benefits that wild places have to our wellbeing is a priority for us all. With biodiversity under significant threat, we are putting in place a biodiversity strategy to help play our part to address the decline, while also creating beautiful green and open spaces that support our customers' well-being.

Delivering affordable and thriving places – We are proud to support a tenure-blind approach to building our communities and work to ensure that our communities offer affordable homes as well as homes for private sale and the private rental sector. We think this is key to creating sustainable communities. We put as much effort into making sure that all our developments are well-connected to transport, schools and other essentials. We also want to support the local economies where we work, and so we are committed to developing plans to support local job creation, training and employment across Countryside's operations by 2025.

To find out more about the seven targets we've set to help ensure we create sustainable communities, please see page 9.

PUTTING THE WELL INTO WELLNESS

THRIVING TOGETHER

We are only able to create places that people love to live thanks to the expertise, passion and commitment of our people. This is why we are committed to fostering an environment where everyone belongs and loves to work; a place where we can grow together as one team overcoming shared challenges and helping us to achieve our sustainability ambitions.

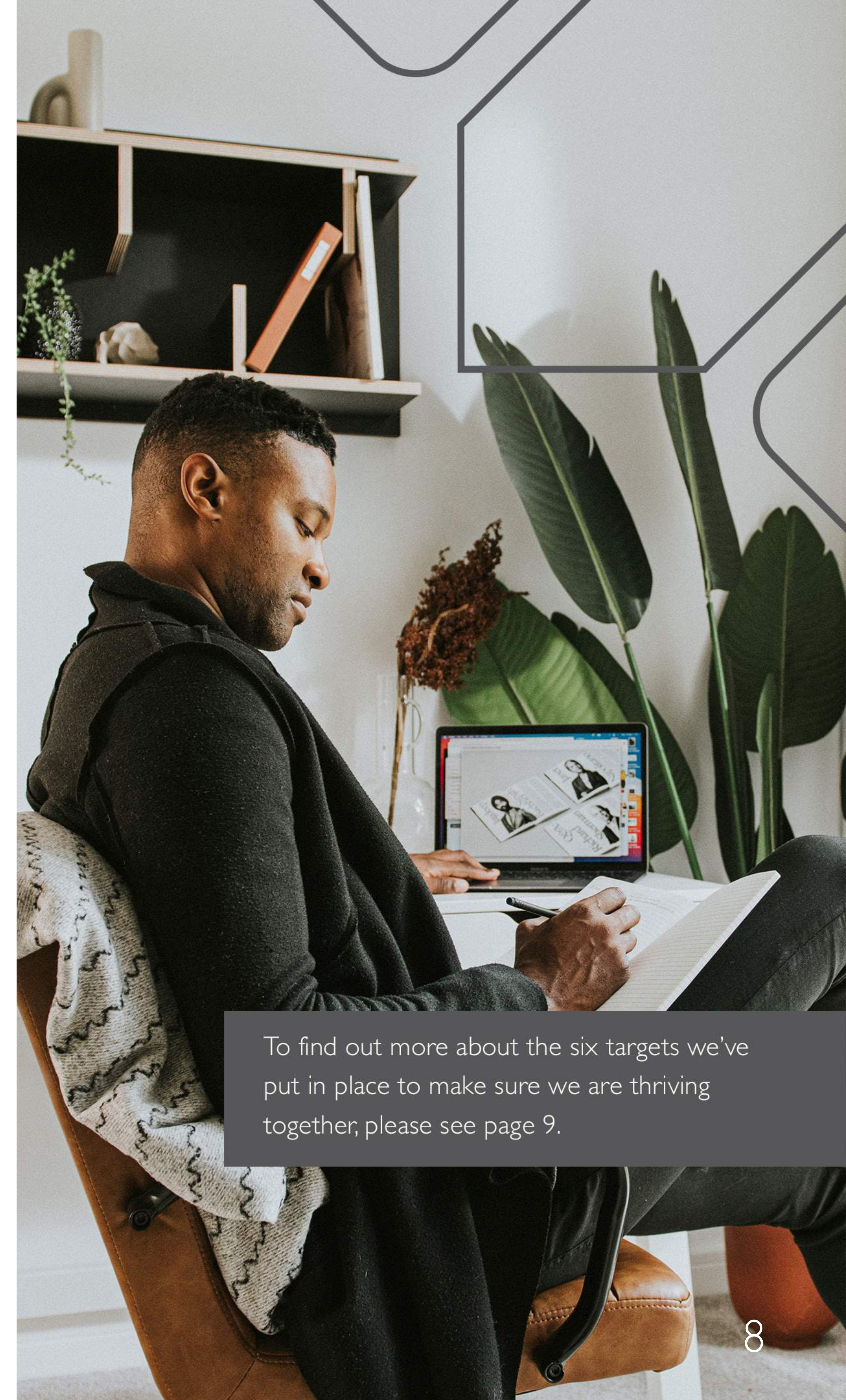
By 2025, we will create an inclusive and rewarding workplace, where all our people feel they can thrive and create places people love.

We have already made great strides forward bringing our employees together in 2020 to create a shared set of values to drive our decisions and behaviours across the business. But, we know there is more we can and should do. To support our ambition, we will build on our previous efforts to create a workplace where we:

Develop, grow and thrive – We want to inspire our people to be the builders and community creators of the future. We also want people to feel they can give their best, using their unique skills and talents every day. We are investing in training and development to enhance our people's skills and knowledge, so that sustainability can be embedded in our day-to-day decisions.

Are happy, healthy and engaged – A team that is happy, engaged and motivated creates the foundations we need to address the sustainability challenges ahead and maintain a thriving business. So, we are building on our existing programmes around mental and physical well-being, as well as promoting more active engagement across our business. We have put in place a target to ensure that every site and office has at least one formally trained Mental Health First Aider in place by 2022.

Are diverse, inclusive and fair – For us, being an inclusive, diverse and fair employer means creating an environment where employees can be themselves and are accepted, recognised and have an equal voice and opportunities to thrive. It also means attracting and retaining a workforce that reflects the voices and demographics of the communities where we work, and building in the right support for everyone and the business to prosper. Over the next few years, we will be delivering initiatives to drive forward our commitment to diversity, inclusion and fairness as well as explore how we can better report on our progress.



To find out more about the six targets we've put in place to make sure we are thriving together, please see page 9.

COMMITTING TO THE FUTURE OUR AMBITIONS, COMMITMENTS AND TARGETS

Built To Last	
Our Ambition for the Future	
We will take pride in efficiently and responsibly building 45,000 new sustainable homes by 2025.	
Sustainability Commitments	Supporting Targets
Build Responsibly	Achieve at least 10% better than the HSE National Incident and HBF Incident rates per year
	85% of our supply chain signed up to Supply Chain Sustainability School by 2025
	Procure 100% sustainably sourced timber for building operations per year
Build Efficiently	At least 50% of all homes to be built using modern methods of construction by 2025
	At least 20,000 of homes to be built by our factories by 2025
	Reduce construction waste intensity by 20% by 2025 against our baseline in 2019
	Maintain at least 98% of waste diverted from landfill per year
Build with Pride	Maintain 5* homebuilder customer satisfaction rating per year
	1,000 homes will undergo Building Performance Evaluations by 2025 to ensure the performance of our homes meets design criteria
	Achieve water efficiency in homes of at least 105 litres per person per day (LPPPD) or lower by 2025
	Achieve NHBC Construction Quality Reviews Scores of at least 4 per year
	Achieve 20% better than industry peer group on NHBC Reportable Items per inspection



Sustainable Communities	
Our Ambition for the Future	
We will work with our partners to deliver sustainable communities that enhance the quality of life for over a million people by 2030.	
Sustainability Commitments	Supporting Targets
Community Embrace	Generate 30% in social value annually across Countryside from 2021
	Undertake 3 Post Occupancy Evaluation studies per year to ensure a cycle of continual learning and development
Nature-rich and healthy space	Achieve a net biodiversity gain of at least 10% across our developments by 2025
	Plant 250,000 trees across our developments by 2025
	More than 10,000 homes to have accessible electric vehicle charging facilities by 2025
Affordable and thriving place	Build at least 15,000 affordable homes by 2025
	Develop local job-creation, training and employment support plans across the whole of Countryside by 2025



Thriving Together	
Our Ambition for the Future	
We will create an inclusive and rewarding workplace, where all our people feel they can thrive and create places people love by 2025.	
Sustainability Commitments	Supporting Targets
Develop, grow and thrive	5% of our workforce in apprenticeship trainee and graduate roles per year from 2022
	Maintain an employee turnover rate of ≤ 15% per year from 2022
	Provide, on average, three days of training and development per employee per year from 2022
	Provide, on average, one day of sustainability training and development per employee per year from 2022
Happy, healthy and engaged	Ensure at least one Mental Health First Aider on every site per year from 2022
Inclusive, diverse and fair	Achieve the Living Wage Foundation accreditation



***We will be publishing science-based carbon targets in the summer of 2021.**



CONNECTING PEOPLE AND NATURE

Case Study: Quartet Clapton Common

Every part of Quartet has been carefully created with wildlife and wellbeing in mind.

The apartment buildings have been set back to create space for the existing mature trees to thrive and we have chosen new plants which positively contribute to the biodiversity of the local area and make it an inviting place for local species.

Access to outdoor space in London is crucial to homeowners' sense of wellbeing, and at Quartet, residents have access to a number of wildlife havens, such as Walthamstow Wetlands and Lee Valley Park. To promote sustainable living, the local council has provided various cycle links between the Wetlands, Lee Valley, Tottenham Marshes and many of the local reservoirs.

The new community will be car-free. Quartet has been designed for cycling enthusiasts wanting to make the most of these cycle links, as it provides 220 cycling spaces, making it easier for local residents to use and store their bike. This also gives residents the opportunity to utilise their bike as transport to and from work, as those working in the city can make use of the cycle paths going into central London.

Inside Quartet, residents will have a home that offers a real sanctuary. Along with being surrounded by greenery and great views of the common, the design of the homes has been created to be light and airy, as windows open in two directions, offering more opportunities for daylight and choice of views. Along with all the natural light provided throughout the apartments, all the homes have been fitted with energy-efficient lighting.

CREATING A COMMUNITY

Case Study: Rochester Riverside

Rochester Riverside is more than a housing estate, it's a community. It's a place to live, work and visit. You can raise a family here, retire here, set your own pace here.

Spread over 50 acres, 10 acres of which are green open spaces, our award-winning venture with Hyde, in collaboration with Medway Council and Homes England, includes 1400 new homes, a state-of-the-art primary school, two parks, a food store, coffee shop, hotel and retirement facility.

Everything at Rochester Riverside has been developed to celebrate the town's rich history as a naval dockyard and capture its beauty as a conservation area. From the public art and protected salt marsh creeks that adorn the 2.5kms riverside walk to the brown roofed apartments.

Pedestrian and cycle paths help to encourage active lifestyles, while the nearby Rochester train station gives residents the option to use public transport to get to London. For those that prefer to commute by car, we have provided an on-site car club and electric vehicle charging points for the houses and apartments.

In 2020, Rochester Riverside won the first ever Building for a Healthy Life Award at the Housing Design Awards.

Countryside is committed to creating a green future and building homes and places that people love. Nowhere is this more evident than down by the Riverside.



WE'D LOVE TO HEAR FROM YOU

Let us know what you think about our
approach at: sustainability@cpplc.com



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