

For and on behalf of



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

Land at Cranfield Road, Wootton (ID: 1043 / 658)

**Prepared by
DLP Planning Ltd
Bedford**

September 2021



Prepared by:	
Approved by:	
Date:	September 2021

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

Tel: 01234 832740

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

CONTENTS	PAGE
1.0 Introduction and Structure of Representations	4
2.0 Background to the Local Plan Review and Its Relationship with National Policy and Other Material Considerations.....	6
Summary of Local Plan 2030 and Requirement for Immediate Review	6
National Policy and Guidance	7
Other Material Considerations (Notably Ox-Cam Arc Spatial Framework)	9
Emerging Oxford Cambridge Arc Spatial Framework.....	9
3.0 Representations – Draft Plan Vision, Objectives and Strategy Options.....	11
Comments on Strategy Options / Proposed Approach and Supporting Evidence.....	11
Paragraph 1.5 (proposed plan period)– Object	11
Reasoning	12
Remedy	12
Paragraph 1.10 (alignment with the Ox-Cam Spatial Framework)– Comment.....	15
Reasoning	15
Remedy	16
Reasoning	17
Paragraph 1.47-1.48 (Neighbourhood Planning)– Object.....	17
Reasoning	18
Remedy	18
Paragraph 3.10-3.23 (transport strategy)	19
Preferred Options 2a-2d.....	19
Reasoning	19
4.0 ANALYSIS GROWTH AND SPATIAL OPTIONS.....	22
Introduction to Site and Proposals	22
5.0 Response to Site Assessment Pro-Forma (Call for Sites ID 658)	27
Site Assessment Criteria – Heritage / Object / Comment	27
Reasoning	27
Suggested Alternative Site Assessment Finding	28

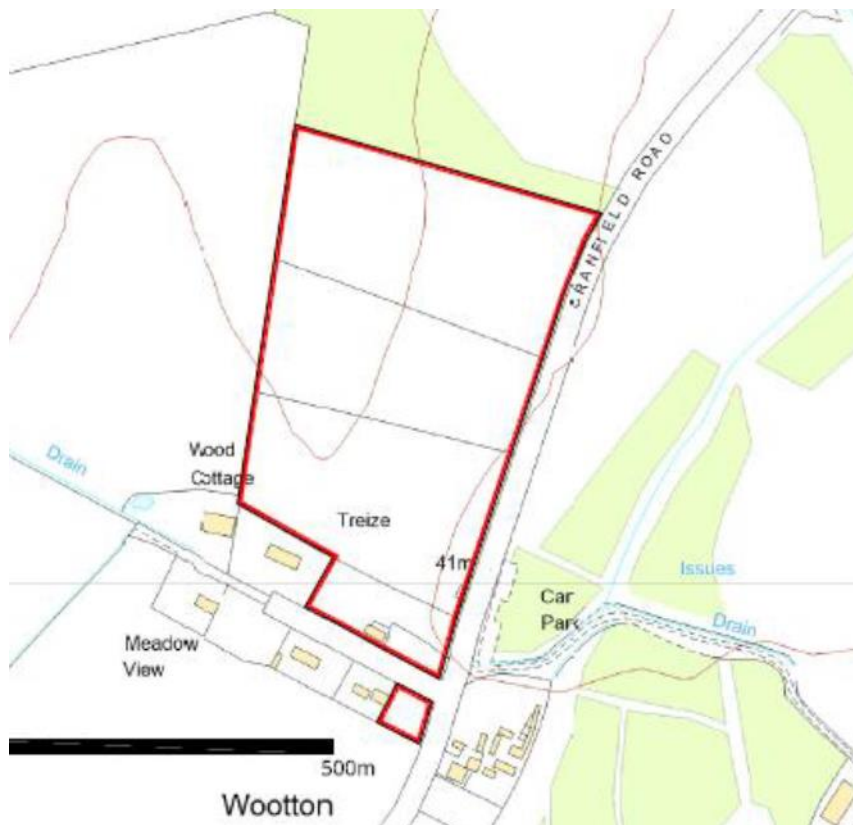
APPENDICES

Appendix 1	Site Plan, Call for Sites Ref Number 658
.....	Error! Bookmark not defined.

1.0 INTRODUCTION AND STRUCTURE OF REPRESENTATIONS

- 1.1 These representations to the 'Bedford Local Plan 2040 – Draft Plan Strategy Options and Draft Policies (Regulation 18) Consultation' have been prepared by DLP Planning Ltd (DLP) on behalf of [REDACTED].
- 1.1 These representations are submitted on behalf of [REDACTED] in respect of land in their control to the west of Cranfield Road, Wootton. The site is identified in the local plan as ID: 1043 / 658 and is proposed for residential development.
- 1.2 This Report addresses the Council's consultation proposals and identifies those elements of the Council's Preferred Strategy Options, notably village-related growth in the 'south' corridor parish of Wootton that are supported with reservations and subject to finalising the evidence base for the strategy as a whole.
- 1.3 First commentary is made on the general strategy of the plan, particularly considering the changing strategic policy and investment environment of Bedford. This references the role of the Oxford-Cambridge Arc and strategic transport improvements taking place within the plan period, including the A1, Black Cat junction and East-West Rail. There is concern over the lack of recognition regarding the challenges associated the scale and pace of strategic residential reliant upon this pattern of investment, which is not reflected in the current draft strategy options.
- 1.4 Second this Report emphasises the role that village-related growth at Wootton can play in delivering growth in accordance with government policy in the period to 2030 and beyond as part of the requirements for review of the Bedford Local Plan 2030 . The report provides evidence as to how the emerging development plan is inconsistent with central policy and guidance; and will not, if pursued, result in the achievement of sustainable development. The solution to this strategy is the delivery of additional sites in proximity to connectivity and infrastructure available in the plan period as part of a wider 'hybrid' strategy.

- 1.5 Modifications are suggested to enable preparation of a version of the draft Local Plan 2040 that addresses the issues identified, ahead of further consultation and subsequent Submission and Examination.
- 1.6 The report is set out as follows:
- 1.7 **Section 3** addresses specific comments on the Council's Preferred Strategy Options and Preferred Option Policy Proposals together with their supporting evidence.
- 1.8 **Section 5** discusses the suitability of our client's land for development including a response to the Council's Site Assessment Proforma.



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

Summary of Local Plan 2030 and Requirement for Immediate Review

- 2.1 The Bedford Local 2030 (BLP2030) was adopted subject to the provisions of Policy 1 – ‘Reviewing the Local Plan 2030’. The Inspectors’ Report provides further clarification of the requirement for Modifications introducing the approach to this Policy and that it was considered essential for soundness.
- 2.2 Paragraph 1.1 of the Council’s Strategy Options and Draft Policies Consultation (LP2040) affirms the significance of the ‘guillotine’ mechanism inserted within the review policy, which engages paragraph 11(d) of the NPPF2021 in the event that a new Plan is not submitted for Examination before January 2023. While the Borough Council is aware it cannot avoid the consequences for the statutory development plan of failing to adhere to these timescales the Preferred Options published for consultation must also address the reasons for first introducing Policy 1. Drawing from the Inspectors’ Report:
- Paragraph 17 emphasises the importance of considering longer-term requirements and thus together with other issues with the Plan a **need** for the review to be undertaken **as quickly as possible** with the three-year timeframe providing balance to allow work to be completed effectively
 - Paragraphs 33-34 anticipate that the review will consider the balance between jobs and workers including any changes in the balance of net out-commuting and the implications of the Oxford-Cambridge Arc
 - Paragraph 40 confirms that the Local Plan 2030’s housing requirement was determined as 970 dwellings per annum as a result of transitional arrangements for the Examination of Plans under the 2012 version of the Framework.
 - Paragraph 113 confirms an expectation of two reviews before 2030 to address potential issues of non-delivery, maintain a buffer in supply and to ensure that the allocation/supply of housing is sufficient to meet the identified need, which is, itself, likely to change over time (as calculated by the government’s standard method).
 - Paragraph 123 recognises that the continued existence of a five year supply of deliverable sites (within the provisions of the Local Plan 2030) is dependent on the progress with constrained capacity in the urban area and bringing forward allocations within Neighbourhood Plans quickly. The scope for early review is to allow for potential issues of non-delivery to be addressed and to consider the requirement for any additional housing site allocations in the light of evidence on housing need and realistic supply at that time.
- 2.3 Paragraph 18 of the Inspectors’ Report confirms that Policy 1 cannot set the parameters of the updated Local Plan. While there is a desire for alignment with the delivery of cross-boundary strategic priorities (including those related to the delivery of the Oxford-Cambridge

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

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

National Policy and Guidance

- 2.7 The most recent version of the National Planning Policy Framework was published in July 2021, following commencement of the Council's LP2040 consultation. The changes were published in draft format in January 2021 (including those relevant to the plan-making framework) and thus available for the Council to consider.
- 2.8 These representations highlight four important components of the 2021 Framework and the changes they necessitate for the scope of the review, relative to the 2012 version of the Framework against which the current Local Plan 2030 was assessed. Other specific provisions of the Framework and NPPG are referred to in comments relating to detailed elements of the consultation proposal.
- 2.9 Firstly, Paragraph 22 of the NPPF2021 confirms that strategic policies should look ahead

over a minimum 15-year period from adoption and anticipate long-term requirements. This is a significant change from paragraph 157 of the 2012 Framework that specified that policies should be drawn up over an appropriate timeframe and only preferably a 15-year horizon.

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

(ID: 2a-010-20201216).

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

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

Emerging Oxford Cambridge Arc Spatial Framework

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

and investment decisions under four policy pillars:

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

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

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

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

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

3.0 REPRESENTATIONS – DRAFT PLAN VISION, OBJECTIVES AND STRATEGY OPTIONS

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

Comments on Strategy Options / Proposed Approach and Supporting Evidence

Paragraph 1.5 (proposed plan period)– Object

- 3.2 Definition of the proposed plan period underpinning the Council's Preferred Options has been rendered inconsistent with national policy following publication of the 2021 version of the NPPF.
- 3.3 Paragraph 1.2 of the 'Creating a Vision for the Ox-Cam Arc' consultation document also confirms that the Spatial Framework will extend to 2050 and beyond. Preparation of the Bedford Local Plan 2040 should be undertaken consistently with this aim.
- 3.4 The proposed plan period of 2020 to 2040, particularly when read in the context of the Council's draft strategy could result in a further delay in meeting development needs in full (until at least 2030). This will generate a requirement for further, successive, reviews; and is setting the plan up to fail both in terms of overall supply and also the spatial distribution which will not allow a clear vision for planned growth in the villages that will be necessary to deliver the scale of growth needed. This includes parishes such as Wootton located within the A421 corridor.
- 3.5 Significant extensions to existing villages and towns that form part of the strategy for an area should be set within a vision that looks further ahead (at least 30 years) rather than the minimum 15 year time horizon from the date of adoption of a local plan.
- 3.6 Given Bedford's location in the Ox-Cam Arc a 30 year horizon is essential where paragraph 1.2 of the 'Creating a Vision for the Ox-Cam Arc' consultation document confirms that the Spatial Framework will extend to 2050 and beyond. Preparation of the Bedford Local Plan 2040 should be undertaken consistently with this aim.
- 3.7 The larger-scale approaches to development (including new settlements) that the Council has identified as part of its Preferred Options accord with the circumstances that national policy identifies for considering a minimum 30-year horizon, to take account of longer timescales for development.

Remedy

- 3.8 Bedford Borough Council should not wait for transitional arrangements upon introduction of the Framework to have to undertake yet another review that will need to consider the shortfall in meeting needs and addressing strategic priorities to 2030. Realistically, as a result of the scale and pattern of the Preferred Options proposed, delays to timescales for development are also likely to result in delays to meeting needs in full between 2030 and 2040. Those parts of the Council's draft strategy relying on larger-scale development including New Settlements and rail-based growth should be profiled to look further ahead to 2050.
- 3.9 This reemphasises that in terms of the soundness requirements, the Council must fully embrace those sustainable opportunities to meet the increased requirements for growth in the immediate term and enable this through the prioritisation of suitable and deliverable sites as part of a 'hybrid' strategy. Village-related growth in the 'south' corridor parishes is complementary this approach and the benefits of early delivery.

Remedy

- 3.21 Those parts of the Council's Preferred Options relying on larger-scale development should be profiled to look further ahead to 2050.
- 3.22 This reemphasises that in terms of the soundness requirements for preparation of the Local Plan 2040 the Council's proposed approach must also fully embrace those sustainable opportunities to meet the increased requirements for growth in the immediate term and enable this through the prioritisation of suitable and deliverable sites as part of a 'hybrid' strategy.
- 3.23 Policy 3S of the Bedford Local Plan 2030 sets out the spatial strategy. Through criteria (vi) this directs strategic scale residential development to Key Service Centres to be allocated through Neighbourhood Plans prepared in accordance with Policy 4S. While Wootton is not listed amongst the Key Service Centres in Policy 4S it is addressed in criteria (iv) of Policy 3S, with the spatial strategy providing for:

"The completion of Wixams new settlement and strategic urban and village extensions to the west of Bedford, at Wootton, Stewartby and Shortstown"

- 3.24 This reflects the background to the strategy selected in the LP2030. More detail is provided

in the BBC 'Development Strategy and Site Selection Methodology' (September 2018). In the second Pre-Submission version Local Plan this explains (at paragraph 4.7) the exclusion of Wootton from further allocations through NPs to be prepared due to "significant recent and ongoing expansion of about 1,300 dwellings."

3.10 Paragraph 6.14 of the LP2030 emphasises the Key Service Centres demonstrate a strong service role for local communities, and this includes Wootton. Paragraph 6.17 sets out that the scale of growth should have regard to the capacity of existing infrastructure. For Wootton, this takes account of the 1,300 units referred to above.

3.11 However, the process for the preparation of Policy 3S/4S in the adopted Bedford Borough Local Plan 2030 needs to take account of its background, namely:

- It was prepared and submitted for Examination under the requirements of the NPPF 2012;
- The Plan's objectively assessed housing need falls significantly short of local housing need calculated using the standard method, with Bedford Borough Council expressly aware of this in dictating the timing for submission of the Plan
- The Plan has a significantly foreshortened plan period covering less than 10 years from its adoption in 2020.

3.12 The evidence base for site assessment and site selection does not indicate a lack of capacity for further significant sustainable growth adjacent or well-related to the Settlement Policy Area in the medium term. Earlier rounds of plan-making (prior to shortening the plan period to 2030 and summarised in the Development Strategy Topic Paper) recognised that for Wootton:

- growth in Wootton, Shortstown, Wixams and Stewartby should be limited until after current commitments have been completed. (paragraph 2.15); and
- identified a provisional requirement for Wootton of 250 to 350 units to be provided later in the plan period post-2025 (Table 2)

3.13 These circumstances are now borne out in details of the emerging Draft Plan Strategy Options for the Local Plan 2040, which identifies a significant potential for growth at Wootton

and is a material consideration for the emerging WNP.

- 3.14 With the publication of the emerging Draft Plan Strategy Options review Local Plan 2040, the emerging WNP is already seeking to pre-empt the decision making on the updated strategy without taking account of future policy conflicts. Conflicting policies from the WNP will potentially undermine the objectives of the Plan through not allocating sufficient sites to give flexibility to housing delivery.
- 3.15 Planning Practice Guidance specifies that although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested (ID: 41-009-20190509). This is an area that should be the subject of discussion between the qualifying body and local planning authority.
- 3.16 Policy 1 of the Bedford Local Plan 2030, which requires that a new Local Plan containing policies to meet housing need calculated in accordance with the government's standard method be submitted for Examination before February 2023, dictates that conflict between relevant strategic policies and the emerging WNP is to be anticipated. These circumstances are likely to take effect earlier than two years after any NP for Wootton is 'made'. NPPF2021 paragraph 14 would therefore be disengaged on the grounds that criterion (b) (policies and allocations sufficient to meet the housing requirement) is no longer satisfied.
- 3.17 The strategic direction of the Draft Plan Strategy Options for the Local Plan 2040 continues to recognise the sustainable role and function of Key Service Centres and their capacity for growth whilst seeking to focus the provision of growth through strategic sites and corridors, together with the urban area of Bedford. Wootton is therefore well-related to the Council's Preferred Options and provides a critical opportunity to contribute towards increased housing needs in the short and medium-term.
- 3.18 Wootton clearly falls into accommodating greater quantum of growth in this strategy and therefore a review of WNP will be required to consider how it would maintain general conformity with the emerging strategy.
- 3.19 The consideration of reserve sites as part of the ongoing WNP Examination would be a move towards the flexibility in adherence to the new Local Plan and the published growth options.

- 3.20 This becomes especially relevant when consideration is given to the ability to accommodate strategic infrastructure associated with growth (include progress with East-West Rail). Growth in the 'south' corridor parishes to complement these strategic opportunities, through recognising the longer-term role of sustainable Key Service Centres including Wootton to sustain and enhance their function, reflects the ability to expand and utilise social and community infrastructure at all locations suitable to address housing need within the corridor.

Paragraph 1.10 (alignment with the Ox-Cam Spatial Framework)– Comment

- 3.9 The draft strategy contends that the Council draws heavily on the 'pillars' of economic development and the natural environment drawn from the Spatial Framework. However, they fail to embrace the comprehensive approach to supporting sustainable development as anticipated by the Spatial Framework. Paragraph 1.10 ignores altogether the place-making 'pillar' of the Framework while the LP2040 draft strategy as a whole is overly reliant on assumptions regarding improvements in strategic-level connectivity. This fails to embrace local opportunities for sustainable development.

Reasoning

- 3.10 It is surprising, and inconsistent with national policy and the emerging objectives of the Ox-Cam Arc Spatial Framework, that the LP2040 draft strategy Options make no mention of the connectivity or place-making pillars of the Spatial Framework. Each should be considered of equal importance.
- 3.11 Specifically, paragraph 4.1 of the Ox-Cam Arc consultation places significant emphasis on connectivity, defined as:

"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."

- 3.12 Paragraph 4.4 affirms the importance of recognising the needs of an ageing population in terms of service delivery and moreover, 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"

- 3.13 The settlement hierarchy in Bedford Borough means that Rural Service Centres and Key Service Centres across the authority have a key role in delivering the requirement for

sustainable communities, serving a wider rural hinterland – both immediate needs and throughout the plan period. The strategy in the BLP2030 has deferred important decisions relating to these priorities both in terms of avoiding the reclassification of centres and by placing the requirement to allocate sites upon Neighbourhood Plans.

- 3.21 Priorities have therefore not been addressed and in any event the current strategy has only sought to address a foreshortened period to 2030.
- 3.22 In the case of Wootton, no provision for additional growth was identified in the strategic policies of the LP2030, by reason of plan period and the Council knowingly opting to pursue an objectively assessment of housing needs substantially below government policy as indicated by the result of the standard method. These policies (including Policy 3S) nonetheless recognise Wootton's highly sustainable location and support for recent patterns of growth south of Bedford.

Remedy

- 3.14 The Council's draft strategy consultation proposals offer limited scope to address these local requirements for place-making and connectivity as part of a comprehensive strategy with no confirmation of the levels of growth that may be supported in Wootton as part of the selected strategy option.
- 3.15 The Local Plan must acknowledge the continuing need for additional village-related growth within the 'south' transport corridor parishes. Considerable and significant growth is weighted towards the delivery of strategic new settlement growth. Such development carries substantially higher delivery risk and is dependent on strategic infrastructure. 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 within the context of a longer term vision.

Paragraphs 1.47-1.48 (Neighbourhood Planning) – Object

- 3.16 The Council's consultation document considers the role for development allocations to be identified in Neighbourhood Plans (as a result of the strategy in the BLP2030) in the context of updates to the development strategy explored through the LP2040 consultation.

- 3.17 The consultation fundamentally fails to assess the role and performance of Neighbourhood Plans in meeting the requirements for sustainable development (including housing delivery) in the period to 2030. The consultation proposals also provide no clarity on the impact of meeting additional requirements for growth in terms of whether the policies in 'made' and draft plans will remain in general conformity with the development strategy nor how further allocations might be provided for in an effective and positively prepared manner. The Wootton Neighbourhood plan is being prepared at present in accordance with a plan being superseded, with lower and unrealistic growth targets to meet need and comply with national policy guidance.

Reasoning

- 3.18 At paragraph 1.48 the Borough Council only provides vague indications of where further engagement might take place with parish councils to meet additional requirements for growth where a range of suitable sites are identified.
- 3.19 This paragraph is inconsistent with the intentions for a stepped trajectory and the NPPG for reviewing NDPs (which should encourage early review when strategic policies have changed). That is an inevitable consequence of the development plan in Bedford given its current failure to address levels of growth in accordance with the standard method. The Borough Council's own evidence indicates the strong likelihood of sites where early delivery can be prioritised. This does not demand that meeting increased requirements for growth should extend beyond 2030.
- 3.20 Paragraph 28 of the NPPF2021 reaffirms the role for NDPs in providing for non-strategic allocations. Paragraph 29 confirms this must be within the context of NDPs not promoting less development than set out in adopted strategy policies (which in this case will be replaced in the Local Plan 2040). Paragraph 66 of the NPPF2021 outlines that strategic policies should set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. This is an important distinction from the NPPF2012. However, the Council's testing of options for the LP2040 rolls forward a 'one-size fits all' distribution of potential levels of growth in Key Service Centres and Rural Service Centres.
- 3.21 This paragraph is inconsistent with the intentions for a stepped trajectory and the NPPG for reviewing NDPs (which should encourage early review when strategic policies have

changed). That is an inevitable consequence of the development plan in Bedford given its current failure to address levels of growth in accordance with the standard method. The Borough Council's own evidence indicates the strong likelihood of sites where early delivery can be prioritised. This does not demand that meeting increased requirements for growth should extend beyond 2030.

- 3.22 Paragraph 28 of the NPPF2021 reaffirms the role for NDPs in providing for non-strategic allocations. Paragraph 29 confirms this must be within the context of NDPs not promoting less development than set out in adopted strategy policies (which in this case will be replaced in the Local Plan 2040). Paragraph 66 of the NPPF2021 outlines that strategic policies should set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. This is an important distinction from the NPPF2012. However, the Council's testing of options for the LP2040 rolls forward a 'one-size fits all' distribution of potential levels of growth in Key Service Centres and Rural Service Centres.
- 3.23 This fundamentally fails to accord with the current requirements of national policy and guidance and, importantly, has currently precluded the Council from considering 'hybrid' alternatives to the spatial strategy that would allow appropriate levels of sustainable development to be prioritised across the settlement hierarchy. It risks leading to planning by appeal in Neighbourhood Plan areas where the NDP has fallen out of date or has not been prepared in accordance with the most current and relevant Local plan.
- 3.24 It is a necessary under national policy to ensure that the emerging Local Plan 2040 is able to provide a requirement figure to designated Neighbourhood Areas. This will inevitably materially exceed the evidence currently relied upon in the context of the LP2030. This forms a material consideration as specified in the PPG (ID: 41-084-20190509) to identify those circumstances where it will be necessary to review and update Neighbourhood Plans. This is particularly relevant in Wootton given the absence of any requirement to contribute towards the overall scale and distribution of growth in adopted strategic policies.

Paragraph 3.10, 3.23 Transport Strategy - Comment

Preferred Options 2a-2d: Component of rail based growth -Object

- 3.25 The Council's own evidence demonstrates that the level of rail-based growth at Kempston Hardwick/Stewartby and Wixams relied upon as part of its Preferred Options is unsound. National Planning Practice Guidance ID: 68-020-20190722 states that a pragmatic approach should be taken when considering the intended phasing of sites, where the authority may need to provide a greater degree of certainty than those in years 11-15 or beyond. The PPG expands on this by stating that where longer-term sites are relied upon evidence must be available to demonstrate that they will come forward within the timescales envisaged and at a rate sufficient to meet needs over the plan period.

Reasoning

- 3.26 The Bedford Local Plan 2040 should be more realistic in the delivery timescales for strategic / complex sites. The delivery of large strategic sites is complex with long lead times; especially when dependent upon delivery of infrastructure such as rail or transport schemes. These issues with existing sites will be compounded in the Council's trajectory for the Local Plan 2040 (meaning that even its proposed 'stepped approach' against a requirement of 970dpa to 2030 will not be effective). These representations further demonstrate the lack of evidence to consider rail-based growth in the A421 corridor as developable any earlier than years 11-15 of the plan period (if not beyond) thus rendering the Council's Preferred Options entirely unsound.
- 3.27 The Council's own Development Strategy Topic Paper identifies multiple risks to the rail-based component of growth in the A421 corridor, including:
- Delivery of new rail stations is proposed, but not yet confirmed.
 - Lead in times for remediation of the Kempston Hardwick area and delivery of new rail stations mean that development in this part of the transport corridor will occur later in the plan period.
 - Detailed analysis of context and density / storey heights to establish appropriate place making for the rail based growth at Kempston Hardwick and Stewartby has yet to be undertaken.
 - The land at Kempston Hardwick is currently being promoted for employment development.

- 3.28 These points confirm that the Council's extremely wide range of potential quanta for the

development of rail-based growth are not currently informed by evidence of site-specific opportunities assessed as suitable, available or achievable. This means that there is no justification whatsoever for the levels of development summarized at paragraph 3.12 of the Council's Topic Paper:

*“Transport corridor – rail based growth: land within the parishes of Kempston Hardwick, Stewartby and Wixams. On the assumption that new rail stations will be delivered at Wixams and Stewartby / Kempston Hardwick, ambitious growth is assumed at both Wixams and Stewartby / Kempston Hardwick in the range of 1,500-3,000 dwellings at Wixams and 2,500-5,000 dwellings at Stewartby / Kempston Hardwick **by 2040**. Within the options two levels of development are tested: a lower option total figure of 5,500 dwellings (2,000 at Wixams and 3,500 at Stewartby / Kempston Hardwick) and a higher option of 7,500 dwellings (3,000 at Wixams and 4,500 at Stewartby / Kempston Hardwick)”*

3.29 There is no evidence to indicate these totals as developable in the period to 2040. In the absence of site-specific testing the Council can have no grounds to suggest how constraints might be overcome, when infrastructure will be provided and whether the extremely high levels of development required to meet these totals over a very short period between sometime after 2030 and 2040 can be achieved.

3.30 The extent of this uncertainty is summarized in footnote 1 on pp.8 of the Development Strategy Topic Paper:

“East West Rail are currently consulting on two options for the Marston Vale Line; one which retains the current stations at Stewartby and Kempston Hardwick, and another that replaces them with a new station (tentatively named “Stewartby Hardwick”) at Broadmead Road. This component of growth is based on development around the new or existing stations in conjunction with development around the new station at Wixams. These stations could provide a focal point for higher density growth supported by the sustainable travel options offered by new and enhanced rail services.”

3.31 The potential for residential development to occur in conjunction with the delivery of new stations as intended by the Council is likely to require a substantially longer lead-in timeframe.

3.32 However, the delay potentially associated with provision of strategic infrastructure could be mitigated through the delivery of modest growth at Key Service centre villages, particularly those are well related to growth corridors and have the ability to provide sustainable growth within the period, even early in the plan period .

4.0 ANALYSIS GROWTH AND SPATIAL OPTIONS

Introduction to Site and Proposals

- 4.1 The site subject to this representation is land off Cranfield Road, Wootton. Representation has been made to the emerging Wootton Neighbourhood Plan for the allocation of the site for residential development. The site has no physical constraint is located on the edge of a Key Service Centre as identified in the Adopted Local Plan 2030 and the merging strategy Bedford Local Plan 2040. The assessment of the site undertaken for the purposes of the evidence base for the emerging WNP does not accurately represent its potential to provide net gains towards sustainable development. This assessment has been undertaken within the context of the adopted LP2030, itself requiring immediate review in order to consider full housing needs in accordance with government policy. The evidence base for the WNP lacks any regard to the achievement of the objectives of the review of the Local Plan.



Source; Wootton Neighbourhood Plan Site Assessments Report – Housing (APC Planning)

- 4.2 Our client's site off Cranfield Road is well served by village facilities, public transport and the

village has an education infrastructure base. The client has undertaken a site appraisal which along with the Parish Council assessment concluded there are no immediate barriers to development. The site is immediately deliverable to contribute to towards providing flexibility in housing delivery. The Parish Council's conclusion in its assessment of the site (ID: 651) states.

Given the proposed access would need to be supported by a Transport Statement to assess highway impacts, adoptable access standards achieved and potential mitigation measures, together with exploring opportunities to enhance sustainable modes of transport.

Apart from potential access issues there are no known major constraints that could affect the viability of the site.

- 4.3 Despite these comments on the positive potential for development of the site the traffic light grading of the site highlighted it as amber in the assessment document which is clearly misleading given the above statement in the same document.
- 4.4 The Same document goes onto conclude that the development of the site would not;
- easily incorporate into the existing pattern of development within the Parish.*
- 4.5 Such a statement fails to take account of development immediately adjacent on the east side of Cranfield Road where 600 dwellings were consented in 2016, and a primary school located in close proximity to the west of the site.
- 4.6 The village centre lies approximately 1km from the site and with appropriate connectivity infrastructure is not considered inaccessible by pedestrian or other sustainable transport modes. The conclusion of the Parish Council is therefore misleading in its site assessment.
- 4.7 Given the scale of development being considered at Wootton as part of the Council's Preferred Options it would be appropriate for the WNP or the allocation of sites in the Local Plan 2040 to consider those directions of growth that could best address the opportunity for sustainable growth in the context of increased housing requirements and the Vision and Objectives of the WNP.
- 4.8 Our client's land and the assessment of adjoining sites demonstrates that this could best be

achieved by a southern extension to Wootton, west of Cranfield Road. Growth in this location would be well-located to recent development and the main services and facilities in the village, together with options for access and local employment. Growth would also avoid any significant adverse effects on the built, natural or historic environment and would preserve the existing settlement pattern, unlike options north of the village impacting upon separation with Keeley Green, Keeley Lane and Wood End.

- 4.9 The site therefore presents an opportunity to meet increased housing delivery targets, required as part of preparation of the draft Bedford Local Plan 2040, which the WNP chooses to ignore. The approach of the WNP is driven by a soon-to-be superseded Local Plan which is being promptly reviewed on the advice of the Inspector and will no longer be considered to satisfy paragraph 11(d) of the NPPF2021 for the purposes of decision-taking from January 2023. The plan also does not give proper adherence to changing strategic investment and policy including the Ox-Cam Arc and the East -West rail which has a material consideration on the assessment of this plan.

Growth and spatial strategy options

- 4.10 The Bedford Local Plan 2040 examines a total of 13 development strategies but have focussed on 4 as being preferential.
- Option 2a: Development in and around the urban area, plus A421 transport corridor with rail based growth parishes & south parishes (2000 dwellings).
 - Option 2b: Development in and around the urban area, plus A421 transport corridor with rail based growth parishes, south parishes (1500 dwellings), plus one new settlement.
 - Option 2c: Development in and around the urban area, plus A421 transport corridor with rail based growth parishes, plus two new settlements.
 - Option 2d: Development in and around the urban area, plus A421 transport corridor with rail based growth parishes, south parishes (750 dwellings) and east parishes, plus one new settlement.
- 4.11 The four strategies identified as preferential for delivering growth are broken down into different locations and spatial options. Within the A421 corridor, existing and planned railway stations and 1 or 2 new settlements are considered alongside village-related growth in 'east' and 'south' corridor parishes. The following observations are key:

- Whilst the Local Plan 2030 identifies a need for 970 dwelling completions a year, the Local Plan 2040 must be based on a minimum of 1,275 dwelling completions a year (based on the standard method). This is a significant (33%) increase. This higher number will apply across the plan period (2020-2040) resulting in the need for a 'top up' for the period 2020 to 2030 (an additional 305 dwellings each year / 3,050 across the ten years), followed by the full 1,275 for each year between 2030 and 2040.
- Over the plan period, in total, the strategy will need to allocate land to enable a minimum of 25,500 dwellings to be delivered (20 x 1,275). Current commitments amount to around 13,000 dwellings which means that land to accommodate in the region of 12,500 dwellings must be allocated in the new local plan.
- The Council's strategy states that to make provision for this level of growth it will require allocation of land at a strategic scale which in turn will rely on the timely delivery of strategic infrastructure. For that reason, one option is for the plan to be based on a "stepped trajectory" which would mean, for example, that the delivery target could be kept at 970 per year until 2030 and then increased to 1,580 dwellings per year to make up the rest of the plan requirement over the remaining 10 years.
- To what extent have the preferred options taken account of circumstances where it may be appropriate to plan for a higher number of dwellings than indicated by the government's standard method for the calculation of local housing need? This is a key consideration the Borough's key location within the Oxford-Cambridge Arc.

Strategic Dependencies

- 4.12 The preferred strategy of the proposed Local Plan 2040 has a number of strategic dependencies and influencers which are beyond the decision making, time scale and delivery of the Borough Council. These strategic dependencies are the Ox-Cam arc, East-West rail improvements, strategic road schemes including A1 and Black Cat junction.
- 4.13 None of the preferred strategy options include other village-related or New Settlements outside of the A421 corridor.
- 4.14 While there are four elements to the strategy for the A421 corridor there is a heavy reliance on 'rail focused' growth in the preferred options (as highlighted) and thus a need for significant investment to deliver a high proportion of the strategy options.
- 4.15 The Council indicates that by 2030 the Black Cat Junction improvements will be complete, the East West Rail section through Bedford Borough will be complete (including new and re-modelled stations) and sufficient lead-in time will have been available for strategic projects to be planned in detail, enabling these higher numbers to be achieved. The Council suggests forward planning will include arrangements for new sustainable travel links, with the intention that these are available from day one in order to embed and promote sustainable travel choices.

- 4.16 Rail focused growth comprises between 31% and 60% of units required to meet the total allocation of 12,500 additional dwellings.
- 4.17 Meeting the housing targets is also dependant on at least a single if not two new settlements. For this reason, the strategy is looking to back load the delivery to the later stages of the plan. New settlements are a notoriously high risk and take a substantial time to get delivered. Indeed, even delivery towards the end of the plan period can be viewed as optimistic. The delivery of the proposed new settlement options thus requires further examination.
- 4.18 Additional flexibility in delivery, particularly where this has potential to complement growth along the A421 corridor, is therefore a key component of any appropriate strategy option to be selected by the Council. This is necessary in order to demonstrate compliance with national policy and guidance.
- 4.19 There is no evidence available to the Council to reject village-related growth in the 'south' corridor parishes as part of the selected strategy option. We would endorse that the minimum figure of 1,500 units identified in the Council's **Option 2b** would represent an appropriate starting points as part of a wider 'hybrid' strategy.
- 4.20 While the Council's Preferred Options are not based on settlement-specific assumptions for the distribution of growth within this 1,500 unit total we would urge the Council to adopt a flexible approach. Within this scenario some settlements may be subject to less growth. In the case of Wootton, given its important role as a Key Service Centre and good accessibility strategic scale village extensions would form part of an appropriate strategy thus making a potential capacity in excess of 500 units a useful starting point for testing site options.

5.0 RESPONSE TO SITE ASSESSMENT PRO-FORMA (CALL FOR SITES ID 658)

- 5.1 The site subject to representation is land off Cranfield Road, Wootton. The site is also subject to representation in the Wootton Neighbourhood Plan regulation 16 Submission plan.
- 5.2 The site was promoted through the Call for Sites consultation in August 2020. The details in the assessed site proforma produced in response to the Bedford Borough Council are perfunctory and lacking in detail. The assessment acknowledges the site extends to 5.64 hectares and is appropriate for approximately 150 dwellings. It acknowledges the site is suitable for general residential development. However, response is made below.

Site Assessment Criteria – Heritage / Object / Comment

- 5.3 The site assessment proforma in respect of heritage states.....

The proposal has the potential to cause harm to heritage assets. This harm may range from low to high. There may be options to avoid, reduce or mitigate this harm and where sites have not been ruled out altogether for other reasons, further assessment will be undertaken to more fully explore impacts on significance and options for harm reduction and mitigation. This further assessment may ultimately lead to the conclusion that the site should not be allocated.

- 5.4 However, this would be subject to heritage assessment and the background document to the proforma is more positive and proactive regarding potential allocation.

Potential high harm to (?)locally significant archaeological remains = low/moderate overall impact?: No known heritage assets of archaeological interest within site but excavations on other side of Cranfield Rd revealed Roman settlement remains not too far distant. Pre-determination archaeological evaluation will be required.

Reasoning

- 5.5 It is accepted that the proposed site would need to be assessed for heritage assets and proposed development would respect and appropriately consider the heritage value, if any, of the site. The conclusion of the proforma assessment is unnecessarily negative and is based only on excavations in the vicinity. The proforma acknowledges there are 'no known

heritage assets of archaeological interest within site’.

- 5.6 The Neighbourhood Plan Submission Version Plan, whilst not recommending the site for inclusion within the plan for allocation, makes no reference to potential heritage conflicts or constraints. Rejection of the site is based only upon the requirements of the development strategy in the emerging WNP. As this representation makes clear the approach in the emerging WNP does not achieve the intended vision and ambition of the review of the Local Plan and requires considerably greater flexibility in order to do so effectively.

Suggested Alternative Site Assessment Finding

- 5.7 It is suggested that the proforma is amended to advise that along with standard procedure a heritage and archaeology assessment is undertaken to accompany development proposals.

Site Assessment Criteria – Transport / Comment

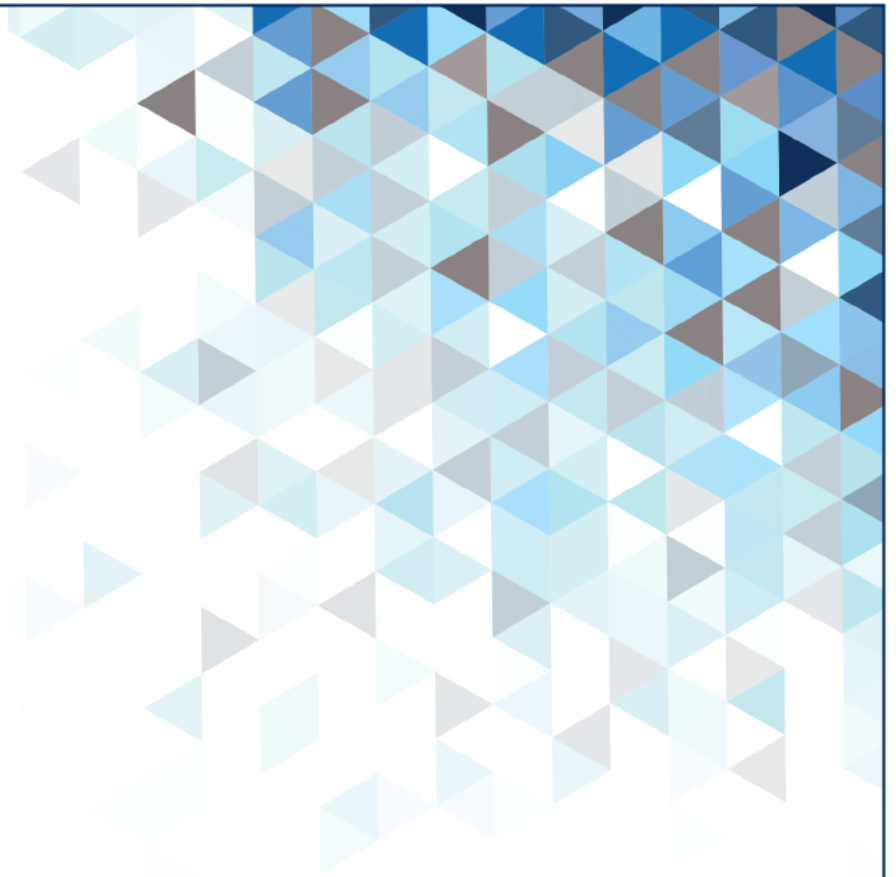
- 5.8 The transport comments of the pro forma are constructive and helpful;

Access from Cranfield Rd. No footways serve the site but land to the east is under development and could provide infrastructure to tie into providing pedestrian links north into Wootton. Bus stops in close proximity to the south providing an hourly C1 service Mon-Fri and less frequent at weekends. Some congestion within Wootton, development would need junction impact assessments. NCN 51 runs on Cranfield Road. Tie into new infrastructure east of the site to provide links to infrastructure and facilities in Wootton. Provide pedestrian and cycle routes within and through the site creating safer routes into Wootton.

- 5.9 The site is generally well connected to existing development and nearby settlements of Bedford and Kempston. Recognised by the existing public transport service and the ability to easily improve pedestrian any cycling facilities to nearby development. Indeed, the comments suggest the site could be plugged into existing infrastructure in the east. It is accepted that a transport statement would be required but that there are no constraints regarding access or connectivity.

Appendix 1 Site Plan, Call for Sites Ref Number 658



**BEDFORD****Planning / SDD / SPRU**

bedford@dlpconsultants.co.uk

BRISTOL**Planning / SDD / SPRU**

bristol@dlpconsultants.co.uk

EAST MIDLANDS**Planning/ SDD**

nottingham@dlpconsultants.co.uk

LEEDS**Planning**

leeds@dlpconsultants.co.uk

LONDON**Planning**

london@dlpconsultants.co.uk

MILTON KEYNES**Planning**

miltonkeynes@dlpconsultants.co.uk

RUGBY**Planning**

rugby.enquiries@dlpconsultants.co.uk

SHEFFIELD**Planning/ SDD / SPRU**

sheffield@dlpconsultants.co.uk

**IEMA** Transforming the world
to sustainability**RTPI**
Chartered Town Planner