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33017/A5/JS/KV/bc

3<sup>rd</sup> September 2021

Dear Sir/Madam,

**BEDFORD BOROUGH COUNCIL – BEDFORD BOROUGH LOCAL PLAN 2040 STRATEGY  
OPTIONS AND DRAFT POLICIES CONSULTATION– LAND AT RUSHDEN ROAD, WYMINGTON**

**Introduction**

We write on behalf of our client, IM Land, who is working with landowners, in respect of their land interest at Land at Rushden Road, Wymington (the 'Site') in connection with the above public consultation on the strategy options and draft policies consultation for the Bedford Borough Local Plan 2040 ('BBLP 2040'). This representation relates specifically to 'Land at Rushden Road, Wymington' and should be read in conjunction with the documents outlined below.

A site location plan is attached at Appendix 1 showing the extent of the area in relation to the wider context. We also accompany our letter with the following technical information which shows the wider Site's suitability, availability and deliverability as a residential allocation:

<b>Appendix</b>	<b>Technical Document</b>	<b>Reason for Submission</b>
1.	Site Location Plan	To set out the limits of the Site
2.	Vision Document	To show how the Site could be delivered as a housing allocation and provide detail relating to the constraints and how these could be mitigated
3.	Concept Masterplan	To show how the Site could come forward as a high-quality development utilising a design-led approach
4.	Heritage Technical Note	To provide an assessment of whether there will be any impact on nearby heritage assets

5.	Landscape and Visual Summary	To provide a landscape and visual summary and to inform the extent of the development.
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The Local Plan 2040 will be a partial update of existing policies to reflect the requirements of Policy 1 (Reviewing the Local Plan 2030) of the Local Plan 2030. The plan review will secure levels of growth that accord with government policy and any growth deals that have been agreed. The planning and delivery of strategic growth will be aligned with the delivery of planned infrastructure schemes including the A421 expressway, Black Cat junction, East West Rail link and potentially the A1 realignment. The review will also serve to build stronger working relationships with adjoining and nearby authorities and may result in the preparation of a joint strategic plan based on a wider geography. In the event that this submission date is not adhered to, the policies in the Local Plan 2030, which are most important for determining planning applications for new dwellings, will be deemed to be 'out of date' in accordance with paragraph 11 d) of the revised National Planning Policy Framework ('NPPF') (July 2021).

The Local Plan 2030 was adopted on 15<sup>th</sup> January 2020 and the Council are required to submit an updated or replacement plan for examination no later than three years after the date of adoption of the plan (by 15<sup>th</sup> January 2023).

This consultation is the second stage in the preparation of the Bedford Borough Local Plan 2040 and focuses on the:

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

We provide detailed responses in respect of the relevant sections and paragraphs of the strategy options and draft policies consultation document below.

## **Bedford Borough Local Plan (BBLP 2040): Strategy Options and Draft Policies Consultation Response**

### **Introduction**

#### **National Context and Plan Period**

Paragraphs 1.5 to 1.52 of the Strategy Option and Draft Policies consultation document set out the national context and the Council's reasoning for extending the plan period to 2040.

Paragraph 22 of the NPPF sets out that strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. The current indicative timetable aims for the Plan to be adopted at the end of 2023. The Council acknowledges that a longer timescale would have the advantage of giving certainty for a longer period, however, there are many important

strategic decisions that will affect the scale and form of growth in and close to Bedford Borough in the medium and longer term that are likely to be made in the next few years. We therefore agree that the plan period is appropriate in these circumstances.

The Arc Spatial Framework is also currently in preparation, with the first stage "Creating a vision for the Oxford-Cambridge Arc" currently ongoing until 12<sup>th</sup> October 2021. The Framework is expected to be implemented at the end of 2022 or at the start of 2023 (at a similar time or a little earlier than the expected examination/adoption of the BBLP 2040). The Council recognise that the Local Plan and Framework share many overarching principles relating to economic growth and the natural environment. We agree with the Council's commitment to support the expansion of existing businesses and to attract inward investment and to make provision for significantly more homes as described in the Arc joint declaration. The current consultation is at a very high level, however, it outlines the overall commitment of the Framework. 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. The government will undertake additional Arc consultations on any specific proposals for such options as appropriate. The Spatial Framework will guide the future growth of the Arc to 2050, including on the question of new housing and infrastructure and will, as part of its development, take into consideration any significant new housing and infrastructure coming forward to meet the Arc's ambition. It is therefore vital that the Council work alongside the Oxford-Cambridge Arc to ensure the BBLP 2040 and the Spatial Framework align as far as possible. As the timescales for the preparation and submission of the BBLP 2040, do not allow the plan making process to follow the publication of the Spatial Framework, we would encourage to Council to commit to a further early review to ensure that the Borough's Local Plan remains aligned with the Spatial Framework and to be able to fully take advantage of and support the opportunities brought to the Borough by the Oxford-Cambridge Arc.

### **Vision and Objectives**

Paragraphs 2.1 to 2.3 set out the vision and objectives of the Local Plan 2040. We agree with the vision and the four themes ('Greener', 'More Accessible', 'More Prosperous' and 'Better Places') that feed into the overall vision.

### **Growth and Spatial Strategy Options**

#### **Level of Housing Growth Required**

The NPPF states that:

***"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."***  
(paragraph 60)

***"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any***

***needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for".*** (paragraph 61)

Pages 13 and 14 of the Strategy Options and Draft Policies consultation document set out the four themes reflecting the Council's vision. The fourth theme is "Better places – Developing high quality, well-designed and beautiful places for all to use and enjoy" and includes the following objectives:

- "Provide appropriate amounts and types of housing to meet the needs of the borough's urban and rural communities over the lifetime of the Plan making the housing stock more adaptable and resilient
- Achieve a borough where everybody has appropriate access to high quality health and social care, as well as everyday essential services and community facilities where social and cultural wellbeing are supported, enabling all residents to lead healthy and independent lives".

In terms of housing growth, the current starting point for the Borough is the standard method figure, which is currently 1,275 dwellings per year, giving a total of 25,500 dwellings for the 20 year period from 2020 to 2040. The Council have also prepared a Local Housing Needs Assessment ('LHNA') (May 2021) (as required by paragraph 61 of the NPPF), however, this does not reflect the new affordability ratios brought out by the government on 25<sup>th</sup> March 2021 and therefore assesses local housing need against a figure of 1,305 dwellings per annum for the Borough (equating to 26,100 dwellings within the plan period). Paragraph 7.78 of the LHNA sets out that "this 26,100 consists of 15,442 additional dwellings to meet projected growth, and a further 10,658 dwellings to meet the LHN. The total should include an overlapping combination of approximately 5,000 specialist older persons households, 5,200 adapted homes and 6,400 affordable homes". It is therefore unclear whether the decrease of 600 dwellings to the minimum requirement will have a detrimental impact on meeting this identified local need.

The Council set out that their existing commitments (planning permissions, allocations from current local plans and an allowance for windfall) equate to a total of 13,000 dwellings. The BBLP 2040 will therefore need to allocate land to provide a minimum of 12,500 new dwellings to at least meet the standard method figure. Whilst we recognise that this new annual requirement (1,275 dwellings per annum) is an increase compared to the adopted Local Plan 2030 (970 dwellings per annum), we are concerned that this does not represent an ambitious response to the aspirations of the Oxford-Cambridge Arc.

This is also reflected in the growth options, with two of the four growth options only indicating that the minimum housing and employment figures will be accommodated. Option 2d is the most ambitious and indicates that between 12,500 and 13,085 dwellings and up to 179 hectares of employment could be accommodated. The growth options also fail to consider the potential for development adjacent to alternative 'urban areas' (other than Bedford) such as IM Land's Site at Land at Rushden Road, which is located within Bedford Borough but adjacent to the southern boundary of Rushden (located within the local authority area of North Northamptonshire Council) and to the western boundary of Wymington. We expand on why Rushden is a highly sustainable settlement suitable for major growth when we respond to the 'Growth Strategy Options' in more detail below.

The Council also consider that a stepped trajectory may be more appropriate with key infrastructure such as the Black Cat Junction improvements and the East West Rail section through the Borough due to be completed by 2030, and to take account of the time required for strategic sites or new settlements to come forward (with the ambition that new sustainable travel links will be available from day one in order to embed and promote sustainable travel choices). Whilst we recognise the ongoing infrastructure improvements within the Borough. The principle of a stepped housing

trajectory is not accepted. The Council should be ensuring the housing needs are met at a consistent rate throughout the plan period rather than deferring until later in the plan period. Housing need is arising now, it is not staggered. The meeting of housing need should not be deferred. We agree that larger sites take significant lengths of time before development commences and optimum rates of housing delivery are achieved, which means that the Local Plan should allocate sufficient smaller non-strategic sized sites to complement larger sites and to ensure HLS in the early to mid-term. The Council should consider sustainable sites (without extensive infrastructure requirements) that can come forward earlier in the plan period and take pressure off the delivery of a high number of sites and homes between 2030 and 2040 (especially those reliant on the delivery of infrastructure or a high level of enabling works that may be subject to delay). The Council recognises that meeting an increased minimum requirement of housing (compared to the adopted Local Plan 2030) will bring with it considerable challenges, and therefore must ensure that they also bring forward suitable and sustainable sites with less reliance on large scale infrastructure projects.

### **Level of Employment Growth Required**

Paragraph 81 of the NPPF sets out that:

***"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential".***

The "Creating a vision of the Oxford-Cambridge Arc" consultation document (July 2021) recognises that the Oxford-Cambridge Arc is already home to a booming and varied economy that contributes to national prosperity, however, this centres around Oxford, Cambridge and Milton Keynes, and has not been spread evenly across these centres or in other towns and rural areas. To overcome this, the document sets out an ambition "to use the Spatial Framework to help tackle these problems. We want to make the most of the economic potential of the Arc by planning for sustainable growth and making the Arc an even more attractive place for all to live, work and do business". They commit to developing an Economic Strategy, setting policies to make sure growth is felt by all communities and the Arc becomes a better place to live and work for all, setting policies which help local planning authorities to plan for new business and employment space, and setting policies to meet the needs of different sectors and businesses.

Paragraph 6.6 of the Strategy Options and Draft Policies consultation document sets out that "the Council have considered planned population growth up to 2040 and therefore consider that there is a requirement of 171 hectares of new employment land within this period. The Employment Land Study (June 2021) sets out that this is likely to be made up of 66 ha for office development (80 ha to 2045), 52 ha for industrial development (62 ha to 2045) and 53 ha for warehouse development (60 ha to 2045).

There is currently 48 hectares of available employment land within the Borough, which is split between four sites (A6 near Souldrop, Land west of B530, Bedford River Valley Park and Medbury Farm), varying in size from 1 to 31 hectares). This leaves a requirement of 123 hectares to be allocated in the BBLP 2050. 60 hectares of this is requirement for the remaining two business parks

required to meet qualitative need (Medbury Farm is already allocated), leaving 63 hectares to be allocated up to 2040 (94 ha to 2045) for further general employment uses split between offices, industry and warehousing. It is concerning that 108 hectares of employment land, to be provided up to 2040, will be provided on only 6 sites within the Borough. The Council consider that the 63 hectares requirement to 2040 (94 ha to 2045) should be allocated in smaller sites which are more likely to be attractive for office and general industry purposes rather than large-scale warehousing. This responds to the need for high quality office and industrial units, however, does not provide flexibility over the plan period in terms of location and size of size that might be required in the longer term.

Paragraph 5.21 of the Employment Land Study states that "Bedford should take advantage of its good and improving accessibility to a wider market area to expand its attractiveness and influence. Growth should seek to maximise the strengths of the local economy and define a unique role that builds on local skills and expertise to minimise future loss of labour and to continue to attract businesses in key sectors". The Council need to ensure that their minimum requirement for employment land fully responds to this aspiration, as well as the aspirations of the Oxford-Cambridge Arc.

The Council are also undertaking further site selection work, which should select adequate sites to exceed the minimum requirement for employment land up to 2040, but also ensure that there is adequate land and choice in terms of location and size, to ensure that any change in requirement can be accommodated within the Borough, and to encourage businesses to stay and to newly locate within the Borough where possible. This is important if the Council wish to achieve their objectives relating to prosperity in the Borough.

### **Growth Strategy Options**

We recognise that options 2a-d are the best performing options in the Sustainability Appraisal and in terms of the high transport work, as well as in terms of the Local Plan themes. We have reviewed these options, as well as options 3 to 6 in the Development Strategy Topic Paper, however, these options do not take account for the potential for development to be located adjacent to alternative 'urban areas' (other than Bedford) such as our Site at Land at Rushden Road, which is located within Bedford Borough but adjacent to the southern boundary of Rushden (located within the local authority area of North Northamptonshire Council).

The North Northamptonshire Joint Core Strategy 2011-31 (adopted July 2016) recognises Rushden as a Growth Town (the highest tier of settlements), and defines its 'spatial role' as "to provide the focus for major co-ordinated regeneration and growth in employment, housing, retail and higher order facilities serving one or more districts". Rushden is therefore a highly sustainable settlement suitable for major growth. There is no reason that growth should not be located the south of the settlement, within the administrative area of Bedford Borough. On this basis, we consider that the Site would perform positively against the greener, more accessible and more prosperous themes that inform the overall vision for the BBLP 2050.

Whilst ongoing or future infrastructure improvements, such as Black Cat Junction improvements and the East West Rail section through the Borough, are due to be completed later in the plan period, and this may inform the overall growth strategy and trajectory, there also needs to be consideration of sustainable sites (without extensive infrastructure requirements) that can come forward earlier in the plan period and take pressure off the delivery of a high number of sites and homes between 2030 and 2040 (especially those reliant on the delivery of infrastructure).



## **Site Allocations and Call for Sites**

We have reviewed the 'Site Assessment' regarding our Site at 'Land at Rushton Road, Wymington' and have the following further comments:

- **Site Size** – The size of the Site is 30.8 hectares (not 30.37 hectares as stated).
- **Adjoining a defined settlement** – We agree the Site is located adjoining the western boundary of Wymington. In addition, the Site is also located adjacent to the southern boundary of Rushton (which is identified as a Growth Town in the adopted North Northamptonshire Core Strategy. On this basis, the Site's relationship with Rushton should be rated as a **positive effect**.
- **Natural England Risks Opportunities (High risk allocation)** – Aspect Ecology prepared "Information to Inform a Plan-level Habitats Regulations Assessment for the Proposed Allocation of the Site" in May 2021. This was submitted to the Council in May 2021.

This document concluded that appropriate mitigation measures would be available as part of a suitably designed development masterplan in order to avoid any likely significant effects on the interest features of identified European level ecological designations (all of which would be achievable under a suitably designed masterplan and detailed development scheme at the site, and could be further secured at the planning application stage). Accordingly, the use of suitable wording as part of any allocation policy in order to ensure the inclusion of such measures would be sufficient to ensure that the proposed allocation of the site would not lead to any adverse effect the integrity of the Upper Nene Valley Gravel Pits SPA/RAMSAR (or any other identified European Site).

On this basis, the Site should receiving a rating of **positive effect** in this regard.

- **Protected species could be affected** – A desk-based review of the Site suggests that the majority of the habitat comprises arable field, which is likely to be of relatively low ecological value. The Site does also include an area of allotments, with hedgerows across the Site and along the boundaries, and patches of woodland to the immediate west and south.

The Site is likely to provide opportunities for common foraging and commuting bat species; however, this would largely be restricted to wooded Site boundaries and hedgerows. Similarly, roosting opportunities may be present within semi-mature to mature trees. If trees with a potential to support roosting bats are retained and protected, and dark corridors are maintained along wooded Site boundaries, then foraging, commuting, and roosting bats are unlikely to be affected by development on the Site.

It is considered that the habitat on the Site for amphibians, including the protected great crested newt ('GCN'), is likely to be sub-optimal.

As protected species are known or likely to exist, there will be a **negative effect**. However, appropriate mitigation can be incorporated into the design of the proposed development.

- Net gain – The development of the Site would achieve a biodiversity net gain. This is therefore considered to be a **positive effect**.
- Heritage Assets – Further work has been completed in regard to the potential impact on nearby heritage assets (see Appendix 4). This further work concludes the following:

*The four designated heritage assets within Wymington are located within its historic core over 400m from the Site. The heritage significance of these assets is derived from their architectural and historic interest as part of the 17th century development of the village, utilising local building materials. The surroundings of these listed buildings have changed significantly over the years due to the expansion of the village from the 1870s to the present day as the shoe industry in nearby Rushden developed. Whilst historically, these buildings formed a coherent group with other buildings in the village (as identified by the HER) they now provide evidential value of the post medieval development of Wymington. The Site does not contribute to their significance other than forming part of the intervening landscape surrounding the village.*

*Knuston High Farm lies 575m to the west of the Site. Its significance is derived from its architectural and historic interest as a farmstead historically associated with Knuston Hall. The farmhouse was constructed in the mid-18th to early 19th century which coincides with a change in ownership of the Knuston Hall estate. The Site is in the most part, physically and visually separate from the farmstead as a result of the topography of the land and intervening mature planting, however views may be gained from limited viewpoints along the public rights of way. Historic research has found no associative or historic link between the Site or the farmstead. As such, the Site is considered to make no contribution to the heritage significance of the farm and instead forms part of its wider landscape, within which residential development forms the backdrop to views to the north and northeast of the farmstead. The development of the Site would bring residential development closer to Knuston High Farm, however as the concept layout shows mitigation can be designed into the scheme to reduce any perceived heritage impact.*

The Vision Document (at Appendix 2) also provides further detail regarding archaeology. It is considered that, with appropriate monitoring, the Site is suitable for development from an archaeological perspective.

On this basis, it is considered there would be a **neutral effect**.

- Agricultural Land Classification – We will provide clarification on whether the Site is grade 3a or 3b land. However we can confirm it is not Grade 1 or 2.
- Access – As set out in the Vision Document (at Appendix 2) primary access will be taken from Rushden Road through the provision of a suitable junction type to serve the development. This will take the form of a T-junction with right turn lane or a roundabout. In this location approximately 140m of highway frontage is available and suitable junction geometries and visibility splays can be achieved based on the 30mph speed limit.

Other access opportunities exist from the following locations:

- 2 existing tracks serving the allotments;
- Redding Close and Carlton Close; and



- Green Lane.

As a minimum all these routes provide opportunities for pedestrian, cycle and emergency access provision into the site but wider opportunities to serve the site from these locations will be explored. Enhancements and improvements to these routes will be facilitated as part of the proposals to aid connectivity through the site and into the existing area ensuring high quality access to available facilities and amenities.

On this basis, we consider there to be a **neutral effect** in this regard.

The site assessment recognised that there are bus stops located adjacent to the Site. The Site is accessible by bus to a major employer, and this is considered to be a **positive effect**.

- Mineral Safeguarding Area – The assessment states that part of the site falls within the boundary of a Mineral Safeguarding Area. We have been unable to locate 'Mineral Safeguarding Areas' on any policy maps (including the Minerals and Waste Local Plan). We request therefore that this matter be corrected.
- Landscape – Further work has been undertaken and a Landscape and Visual Summary is provided at Appendix 5). This further landscape and heritage work has informed the design and mitigation included within the most recent Concept Masterplan (at Appendix 3). We consider the proposals are likely to have a **neutral effect** on the landscape.

These representations are also accompanied by a Vision Document (at Appendix 2), Concept Plan (at Appendix 3), a Heritage Technical Note (Appendix 4) and Landscape and Visual Summary (Appendix 5).

### **Town Centre and Retail Policies**

We have no comments on the draft town centre and retail policies.

### **Employment**

Due to the reassessment of the need for employment land, Policy 69S of the adopted Local Plan 2030 will need to be updated. This will therefore be replaced by proposed 'Policy E1S - Amount and distribution of employment development'. This requires that:

***"A minimum of 8,642 net additional jobs will be provided to 2040.***

- i. The main focus for jobs growth will be in accordance with the plan's development strategy.***
- ii. Applications for B use class employment on sites that are not allocated will be determined in accordance with Policy 72S of Bedford Local Plan 2030. Proposals for non-B class employment on key employment sites will be determined in accordance with Policy 70 of Bedford Local Plan 2030."***

We agree with the amended drafting of the policy to reflect an increased requirement of jobs (although the exact require should be subject to consideration of responses of this consultation) and the changes to the spatial strategy.

## **Development Management Policies**

### **Self-build and custom housebuilding**

Footnote 28 of the NPPF confirms that “under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet”.

We understand that the Council has a duty to provide serviced plots to meet the demand on Part 1 of its Self-build and Custom Housebuilding Register, but will take into account the demand shown by both parts of the register in considering planning applications. The proposed 'Policy SB1 – Self-build and custom housebuilding' sets out that new housing development must include a number of plots for self-build and custom housebuilders in accordance with the following, based on the overall number of net-additional dwellings proposed:

- 1-4 dwellings = no requirement
- 5-9 dwellings = 1 plot
- 10-29 dwellings = 2 plots
- 30-49 dwellings = 3 plots
- 50-69 dwellings = 5 plots
- 70-89 dwellings = 6 plots
- 90-100 dwellings = 7 plots
- 100+ dwellings = by negotiation

The proposed Policy SB1 requires that for sites of 50 dwellings or more:

***"Plots will be marketed solely to individuals and associations on Part 1 of the Council's Register in the first instance for an initial period of two months (minimum) from the commencement of the site being marketed.***

***- Following the initial marketing period, the offer of any unreserved plots will be extended to those on Part 2 of the Council's Register and any new registrants to Part 1 having joined during the initial period. If the developer can provide evidence to the satisfaction of the Council that suitable purchasers from the Register have not been forthcoming within 6 months (minimum) of commencement of marketing the plots, they may be offered for unrestricted market sale to self-build and custom homebuilders including industry sector specialist companies***

***- Any plots not reserved within a further 6 months (minimum) will be released from this specific policy requirement, following a total of 12 months of marketing."***

As of 28<sup>th</sup> July 2021, the Bedford Borough Council Self-build and Custom Housebuilding Register consists of the following:

- Individuals Part 1 = 41
- Individuals Part 2 = 133
- Associations Part 1 = 0
- Associations Part 2 = 0
- Total entries on register = 174

On this basis, it is unclear why the requirement of the proposed 'Policy SB1 – Self-build and custom housebuilding' is so high (considering the current level of demand). For larger sites, there is a total minimum marketing window of 12 months, which will have a detrimental impact on delivery and site build out. We would welcome a site-specific policy, which allows consideration of the level of demand for self-build and custom housing and a requirement for a proportionate level of self-build and custom plots at the time a planning application is submitted. Whilst we welcome a clause in the Section 106 Agreement, for the release of a plot from the requirement of Policy SB1 after a period of marketing, we consider a 12 month minimum marketing period to be unreasonable and unjustified.

### **Quality of development and space standards**

Footnote 49 of the NPPF states that "planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified" (our emphasis).

The proposed 'Policy DQ1 – Residential space standards' requires that "the Council will require all new dwellings to conform to nationally described space standards as a minimum". However, there does not appear to be any justification for this policy requirement, and we therefore do not consider that the inclusion of this additional policy would meet the requirements of the NPPF.

### **Natural environment policies**

Paragraph 8 of the NPPF sets out that "achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)". One of the three objectives is the environmental objectives.

We therefore agree that Policy 43 (Enhancing biodiversity) of the adopted Local Plan 2030 should be replaced by 'Policy NE1 – Environmental Net Gain' in the BBLP 2040. We agree with the wording of the policy and support the inclusion of '(in accordance with government policy)' to ensure the policy remains in line with the requirements of the NPPF.

### **Position Statements**

We provide our comments below on the topics considered to be relevant to our representations:

#### **Climate Change**

We are aware that Bedford Borough Council declared a climate emergency in March 2019 and pledged to make its own operations carbon neutral by 2030. We agree that the Local Plan 2040 can support this objective, through careful consideration of its spatial strategy, adapting development to reduce climate change risk and mitigate against the causes of climate change. As part of this work, the

Council has commissioned a Strategic Flood Risk Assessment ('SFRA'). The SFRA shows that the Site ('Land at Rushden Road') is entirely within Flood Zone 1 and is also not at risk of surface water flooding.

In terms of Future Homes Standards, we agree that development should be delivered in line with the most recently adopted building regulations. On this basis, we also agree that no additional climate change policies are required through the BBLP 2040.

### **Infrastructure Delivery Plan**

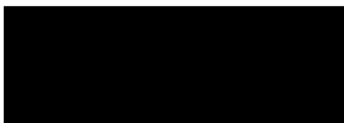
We agree that an Infrastructure Delivery Plan will be required to support the chosen development strategy.


### **Open Space Standards**

We support the ongoing work regarding a Planning Pitch Strategy for the Borough. If this work concludes that new standards are required for the provision of open space within development, we would welcome the opportunity to provide our further comments.

We trust that you will take these comments as helpful in progressing the Plan. Should you require any further information, please do not hesitate to contact me as per the details of this letter.

Yours faithfully,



  
Partner

Encs. Appendices