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For and on behalf of



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

**Land at Northampton Road between Bromham and Stagsden – LPA Ref: 1389**

**Prepared by  
DLP Planning Ltd  
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## 1.0 INTRODUCTION AND STRUCTURE OF REPRESENTATIONS

- 1.1 This representation has been prepared by **DLP Planning Ltd (DLP)** on behalf of [REDACTED] in response to the Bedford Borough Council Local Plan 2040 consultation.
- 1.2 This representation relates to a parcel of land at Northampton Road between Bromham and Stagsden. A location plan identifying the site is provided at Appendix 1.
- 1.3 DLP, on behalf of [REDACTED], welcomes the Council's decision to review and update the various elements of the extant development plan and provide for a new local plan document that will fully reflect the policies of the National Planning Policy Framework (the Framework) and provide for the up-to-date development needs of the borough and its residents in a sustainable manner.
- 1.4 DLP wishes to make a number of comments on the consultation document as part of the background context to the representations we are submitting on the site itself.
- 1.5 Section 5.0 discusses the suitability of our client's land for development, and supplements the responses in previous sections.

## 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 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 Preferred Options Consultation Document 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 Local Plan 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 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 the 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 Local Plan 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 Preferred Options 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 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 Local Plan 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 addresses 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.

##### **Reasoning**

3.3 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.

3.4 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.

3.5 The proposed plan period of 2020 to 2040, particularly when read in the context of the Council's Preferred Options resulting in a further delay to meeting development needs in full (until at least 2030) will generate a requirement for further, successive, reviews and is setting the plan up to fail.

##### **Remedy**

3.6 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.

3.7 Those parts of the Council's Preferred Options relying on larger-scale development should be profiled to look further ahead to 2050.

- 3.8 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.

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

- 3.9 The Council's Preferred Options published for consultation contend that they draw heavily on the 'pillars' of economic development and the natural environment from the emerging Spatial Framework. The representations identify that the Council's published consultation proposals fail to embrace the comprehensive approach to supporting sustainable development anticipated in the Spatial Framework. Paragraph 1.10 of the consultation document ignores altogether the place-making 'pillar' of the Framework while the Preferred Options as a whole are overly reliant on assumptions regarding improvements in strategic-level connectivity. This fails to embrace local opportunities for sustainable development.

***Reasoning***

- 3.10 It is surprising, and inconsistent with national policy and the emerging objectives of the Arc Spatial Framework, makes 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 consultation document 'Creating a Vision for the Oxford-Cambridge Arc places significant emphasis on reducing the need to travel. Connectivity is not just about strategic road/rail links - it means:

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

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

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

- 3.13 The settlement hierarchy in Bedford Borough means that Rural Service Centres and Key Service Centres across the authority have a key role in delivering these requirements for sustainable communities and serving a wider rural hinterland – both in terms of immediate

needs and their role throughout the plan period. The strategy in the Local Plan 2030 has deferred important decisions relating to these priorities both in terms of avoiding the reclassification of centres such as Oakley and in placing the requirement to allocate sites upon Neighbourhood Plans. Priorities have therefore not been addressed and in any event the current strategy has only sought to address a foreshortened period to 2030.

### Remedy

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

### ***Paragraph 1.14 (Scope of the Plan) – Object***

- 3.15 The Council's Preferred Option consultation proposals indicate that the purpose of updates to the Local Plan following the requirements of the review policy (Policy 1) are to outline a development strategy to 2040 and meet national policy requirements for the delivery of growth. This fails to fully reflect the reasons for first introducing the requirement for immediate review and in-particular the pattern and scale of housing growth necessary to achieve sound outcomes for plan-making (particularly with regards paragraphs 20 and 74 of the NPPF2021).

### Reasoning

- 3.16 As set out in the Spatial Framework consultation document (paragraph 5.5) the Arc demonstrates poor affordability where development has not kept pace with need. That is exactly the position in Bedford resulting from the approach adopted in the Local Plan 2030.
- 3.17 This means (at paragraph 5.7) it is an aim of the Framework to ensure that the Framework sets policies to enable ***housing needs to be met in full, including much-needed affordable housing***
- 3.18 This sits alongside strategic decisions where direction will be provided by the Framework

e.g. implementation of East-West Rail, identification of Opportunity Areas and support for the delivery of previously developed land.

- 3.19 What this means in practice is that prioritizing opportunities to meet full development needs is an important component of the place-making pillar as part of a joined-up approach providing for sustainable communities.
- 3.20 The Council's proposed strategy in its Preferred Options consultation proposals would sustain a very substantial shortfall against minimum annual local housing need until at least 2030. Due to only considering a horizon to 2040 and as a result of likely timescales for the characteristics of larger-scale development (including new settlements) it is furthermore highly likely a significant shortfall against full development needs will persist until 2040 and beyond.
- 3.21 The Council's proposed strategy offers no flexibility and choice to address the current and persistent failure to meet needs in full. Our assessment indicates that current levels of development are likely to become significantly constrained substantially before any of the longer-term solutions proposed as part of the Preferred Options achieve significant delivery. Realistic assumptions must also be made in relation to new larger-scale developments.

***Paragraphs 1.47-1.48 (Neighbourhood Planning) – Object***

- 3.22 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 Local Plan 2030) in the context of updates to the development strategy explored via the Preferred Options.
- 3.23 These representations identify that the consultation fundamentally fails to assess the role and ability 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' 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.

**Reasoning**

- 3.24 Paragraph 1.47 of the consultation proposals repeats the strategy outlined in Policy 4S of the adopted Local Plan. This does not confirm a realistic prospect that all 2,260 units will be delivered before 2030. There are outstanding objections to several of the emerging Neighbourhood Plans at Key Service Centres (in particular at Great Barford).
- 3.25 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.
- 3.26 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.
- 3.27 Paragraph 28 of the NPPF2021 reaffirms the role for Neighbourhood Plans in providing for non-strategic allocations. Paragraph 29 confirms this must be within the context of Neighbourhood Plans that do not promote 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 2012 version of the Framework. However, the Council's testing of options for the Local Plan 2040 rolls forward a 'one-size fits all' distribution of potential levels of growth in Key Service Centres and Rural Service Centres.
- 3.28 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.

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

- 3.29 This section addresses two main themes. It firstly sets out the shortcomings of the Vision in

terms of reflecting comprehensive opportunities for sustainable development across the borough. Secondly, it addresses that while there are many positive aspects of outcomes sought under the vision these will not be addressed as part of the strategy due to the Council's selected Preferred Options.

### Reasoning

3.30 The draft Vision sets out:

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

3.31 This aspect of the Vision will not be achieved in the context of the Council's Preferred Options omitting a significant number of the borough's KSCs and RSCs from the spatial strategy and do not seek to provide for the additional development required to secure balanced communities. It is not proposed to allocate small housing sites in the plan and concern is expressed that this will delay housing delivery in the early part of the plan period.

3.32 The Vision further states:

*“Rural communities will embrace appropriate development, in many instances through the preparation of their own neighbourhood plans.”*

3.33 This would imply a requirement for additional growth, which the preferred options exclude for a significant number of centres. The draft Vision fails to address that it is part of the role of the Local Plan review (and resulting updates) to address strategic priorities deferred as a consequence of the Local Plan 2030 (for example expansion of primary healthcare and secondary education). The Vision also fails to reflect that the proposed development strategy is not looking to provide for any additional growth in rural areas as part of an uplift to meet housing needs in full before 2030. This is a significant shortcoming of the strategy and overlooks suitable and deliverable sites that could be prioritised now to meet these increased needs alongside the delivery of other substantial benefits.

3.34 The Vision makes limited reference to specific benefits that the Local Plan 2040 will secure in relation to the natural environment, including Country Parks north of Brickhill and west of Bedford.

3.35 The Vision is artificially constrained as a result of the Council's current position on Preferred



Options. There is no reason that other sustainable developments cannot achieve complementary and significant advantages for Green Infrastructure provision.

- 3.36 Theme 4 (Better Places) of the Council's proposed Objectives for the Local Plan 2040 sets out:

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

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

- 3.37 The principle of these objectives is supported but is reliant on flexibly supporting diverse opportunities for development across the settlement hierarchy. There are a substantial number of centres where the level of development identified is sufficient to secure the opportunities identified.

***Paragraphs 3.15 – 3.17 (Spatial Strategy Options) – Comment***

- 3.38 The emerging preferred options put forward by the Council have an urban focus and the four variations all focus development on the urban area, A421 corridor, and existing and planned rail stations. This approach relies heavily on rail investment and also focuses growth to the south of the town, with very little growth planned to the north, which is where the preferred east-west rail link will go. Therefore, the proposed strategy does not provide for growth to the north of the town along the preferred east-west rail link.
- 3.39 The proposed strategy should include a more dispersed approach to growth to include the northern parishes of Bromham and Stagsden to ensure that the vitality and viability of the villages across the Borough are maintained. To neglect growth at smaller northern parishes is not appropriate, particularly where this can be provided sustainably. As such, a wider variety of suitable sites across the district should be identified for development in the new plan.
- 3.40 It is noted that at this stage there are significant gaps in the Council's evidence base, particularly in terms of infrastructure delivery, viability, and development timescales.

***Paragraphs 3.26-3.28 (Small Sites) - Object***

3.41 The Council's proposed approach to enabling the development of small sites as a source of flexibility in supply and to provide diversity within the construction sector is misconceived and inconsistent with national policy, ineffective and not justified. The Council is simply seeking to ignore the requirements at paragraph 69 of the NPPF2021 and undermine the government's objectives to support *inter alia* SME builders, prosperous rural communities and measures to address affordability.

***Reasoning***

3.42 The Council seeks to rely on evidence of past and expected future trends in windfall development in place of the requirement in national policy to identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare.

3.43 The reasoning for the approach in national policy is simple: the development plan is the most appropriate vehicle to set out positively prepared policies to support the delivery of small sites and enable small and medium developers (who often face the greatest barriers to entry in the sector) to secure implementable planning permissions more easily.

3.44 The Council's own evidence in the Small Sites Topic Paper demonstrates a year-on-year fall in trends in the completion of small windfall sites against the Local Plan 2030 requirement of 970dpa. This is illustrative of issues affecting the sector. The Council must also be mindful of the fact that more recent policies in the development plan (particularly those within Neighbourhood Plans) provide a further barrier to bringing forward appropriate proposals on unidentified sites.

3.45 The evidence from past trends fails to support the Council's contention that windfall supply will provide for 10% of the higher requirement based on minimum annual local housing need for the period 2020 to 2040. The Council relies on expected future trends but the justification for its proposed approach fails for the following reasons:

- The Council's reference to extant commitments takes no account of any potential lapse rate or double-counting with assumptions of future supply
- Expected trends take no account of changes to Permitted Development Rights

(including restrictions upon office-to-residential conversions and a reduction in the number of potentially suitable sites)

- Extant small-site commitments take no account of those that are effectively ‘one-off’ schemes that would not be accessible to the SME sector (e.g., backland plots or subdivision)
- The likely supply from Neighbourhood Plans, which is a tiny proportion of the 2,260 dwellings required from this source and illustrative of these Plans often focusing development on a limited number of challenging sites, is dwarfed by the resulting restrictions on additional growth.

### Remedy

3.46 There are some positive aspects to the Council’s evidence base to support growth on small sites, such as the 136 units’ capacity identified in urban areas. In reality we consider that this total should be increased and that in order to achieve the Council’s Preferred Options to include allocation of a further 1,500 units within the urban area it will be necessary to maximise the potential contribution from small sites. The Council’s total of 1,500 is over-and-above extant development plan allocations within the Town Centre that are and will remain significantly constrained. Failure to diversify urban supply without support through the development plan will result in this component of the spatial strategy being unsound.

3.47 The Local Plan 2040 should also offer substantially greater support for the delivery of small sites in rural areas. This advances the case for the strategic policies of the Local Plan 2040:

- Setting out indicative requirements for all settlements within the borough’s hierarchy (outside of Key Service Centres and Rural Service Centres) to encourage provision for appropriate levels of smaller-scale growth.
- Proactively support the delivery of rural exception sites.
- Where Policy 4S of the Local Plan 2030 is superseded in terms of the scale and distribution of growth required at Key Service Centres and Rural Service Centres ensure that any increased need for development to be provided through reviews of Neighbourhood Plan also has regard to NPPF2021 paragraph 69.

- 3.48 The opportunity for the Local Plan 2040 and any Neighbourhood Plans to be prepared taking a more flexible approach towards the requirements of national policy is supported in principle. For example, where any allocations proposed would offer the opportunity for early delivery and the potential to introduce multiple developers to relevant sites it would be appropriate to treat the 1 hectare threshold pragmatically, recognising that the revised strategy will itself provide substantial opportunities for diversification.

## 4.0 OBSERVATIONS AND REPRESENTATIONS – PREFERRED OPTION POLICY PROPOSALS AND EMERGING EVIDENCE

### Preferred Options – Proposed Policies (Chapters 5-7 of Published Consultation)

#### Policy Updates Pending Additional Evidence

#### 4.1 Paragraph 3.6 (Housing Needs of Different Groups)– Object

*“The LHNA also provides the evidence base to update the policies of the Local Plan 2030 on these matters. Policy 58S Affordable housing and 59S Housing mix will be updated once the viability of the local plan as a whole has been tested.”*

#### Reasoning

- 4.2 The LP2030 evidence on the need for affordable housing is substantially out-of-date and pre-dates the latest version of the NPPF and specific guidance in the NPPG. There is a significant demand for more affordable types of housing and a more flexible policy approach to the provision of affordable housing is required to ensure this need is met.

#### Suggested Approach / Remedy

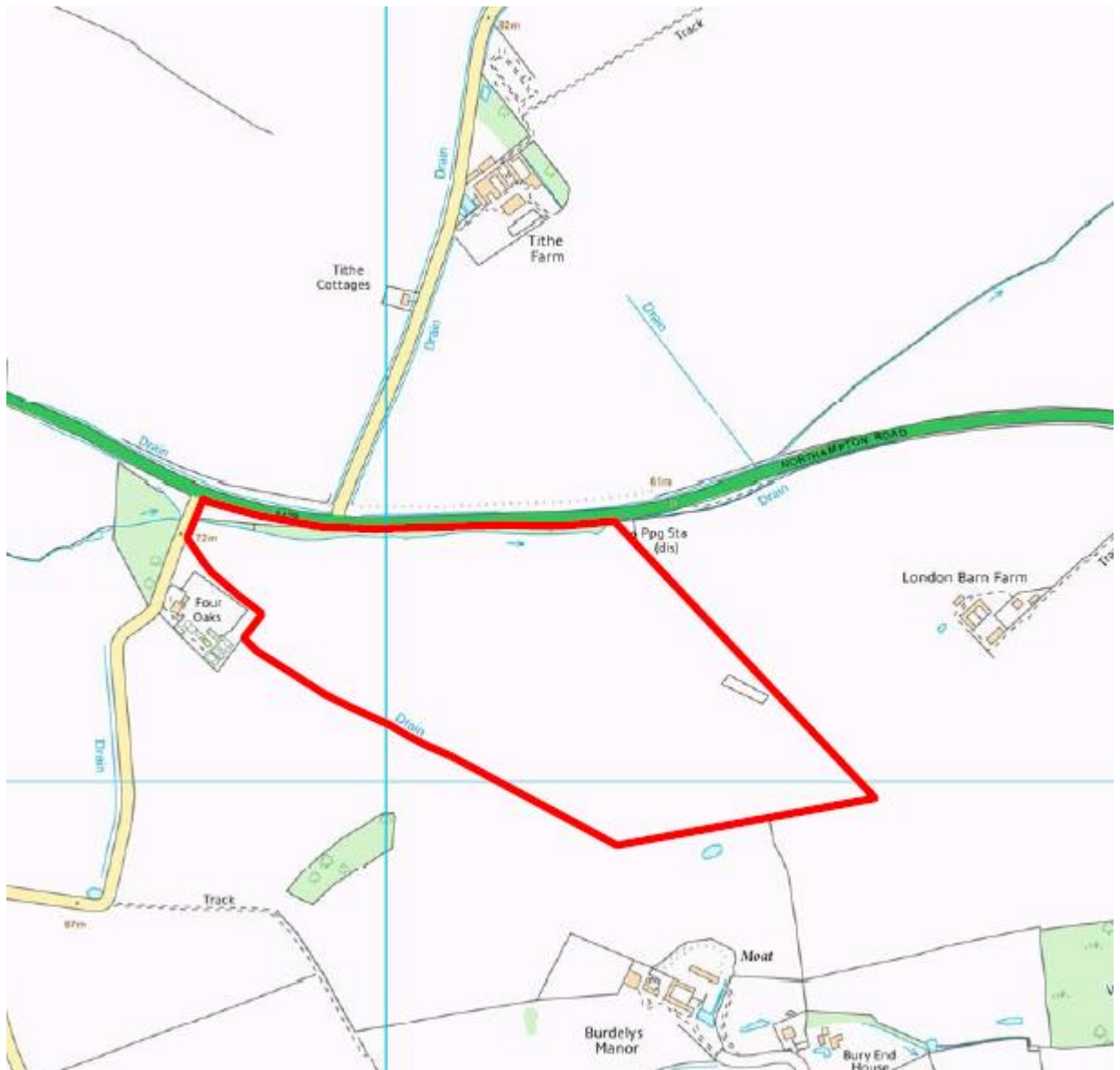
- 4.3 Policy 67 in the LP2030 provides for affordable housing to meet a local need. However, this is fairly prescriptive in its approach requiring sites to be within a settlement policy area or immediately adjoining a settlement policy area or built-up area. It makes no allowance for the provision of affordable housing on other suitable sites.
- 4.4 The review of the local plan should provide for a more flexible policy approach to allow for the provision of 100% affordable housing on other suitable sites that have good access to public transport and links/connectivity with nearby service centres.

## 5.0 RESPONSE TO SITE ASSESSMENT PRO-FORMA (CALL FOR SITES ID 1389)

### Introduction to Site and Proposals

- 5.1 The site was previously submitted to the Council for consideration as part of the Council's 'call for sites' exercise in August 2020. The land area being promoted is shown below.

**Figure 1: Land at Northampton Road between Bromham and Stagsden**



- 5.2 The site comprises an undeveloped parcel of land on the southern side of Northampton Road and is located to the west of Bromham and to the north of Stagsden. There is an existing access from an unnamed road that links with Northampton Road (A428). There is scope to improve and modernise this access or create a new access from Northampton Road.
- 5.3 The site is located within Flood Zone 1 and is not within a Conservation Area or subject to any other landscape designation. Also, there are no heritage assets on the site or within the vicinity of the site.
- 5.4 The site is considered to be suitable for a variety of different uses. The primary use proposed for the site is a rural exception scheme providing approximately 15 affordable houses with development being restricted to the north-western corner of the site to allow for a significant proportion of open space. As part of this, the site is also capable of accommodating an element of market housing and this could also be provided on site.
- 5.5 The site is also suitable for a range of other uses including B1/B2/B8 Use Classes, and even a leisure facility. However, a mixed form of development would appear the most logical form of development for the site as part of the Local Plan Review.
- 5.6 A key part of the development proposals on this site is the provision of a significant amount of public open space, which could take the form of community allotments, a community orchard, or sports pitches etc. Due to the variety of uses that are suitable on site, the site is adaptable to the potentially changing needs of the Council as we move towards a post-Covid era. The provision of employment and leisure activities on site will create more jobs, further aiding the economic recovery.
- 5.7 The site is suitable for development and the landowner is committed to bringing it forward, such that it is available now.

## **Response to Borough Council's Site Assessment Pro-Forma (Site ID: 1389)**

### ***Site Assessment Criteria***

- 5.8 We have reviewed the Council's assessment of the site and wish to make a number of comments below.

**5.9 Within or adjoining the urban area or a defined settlement policy area boundary**

5.10 Whilst the site is not within or adjoining the urban area or a settlement policy area (SPA), it should not be automatically excluded from consideration. The site is well connected to the main road network and in particular the A428, which is the main route between Bedford and Northampton. Furthermore, its location also makes the site suitable for a range of commercial, leisure and employment uses.

**5.11 Protected Species**

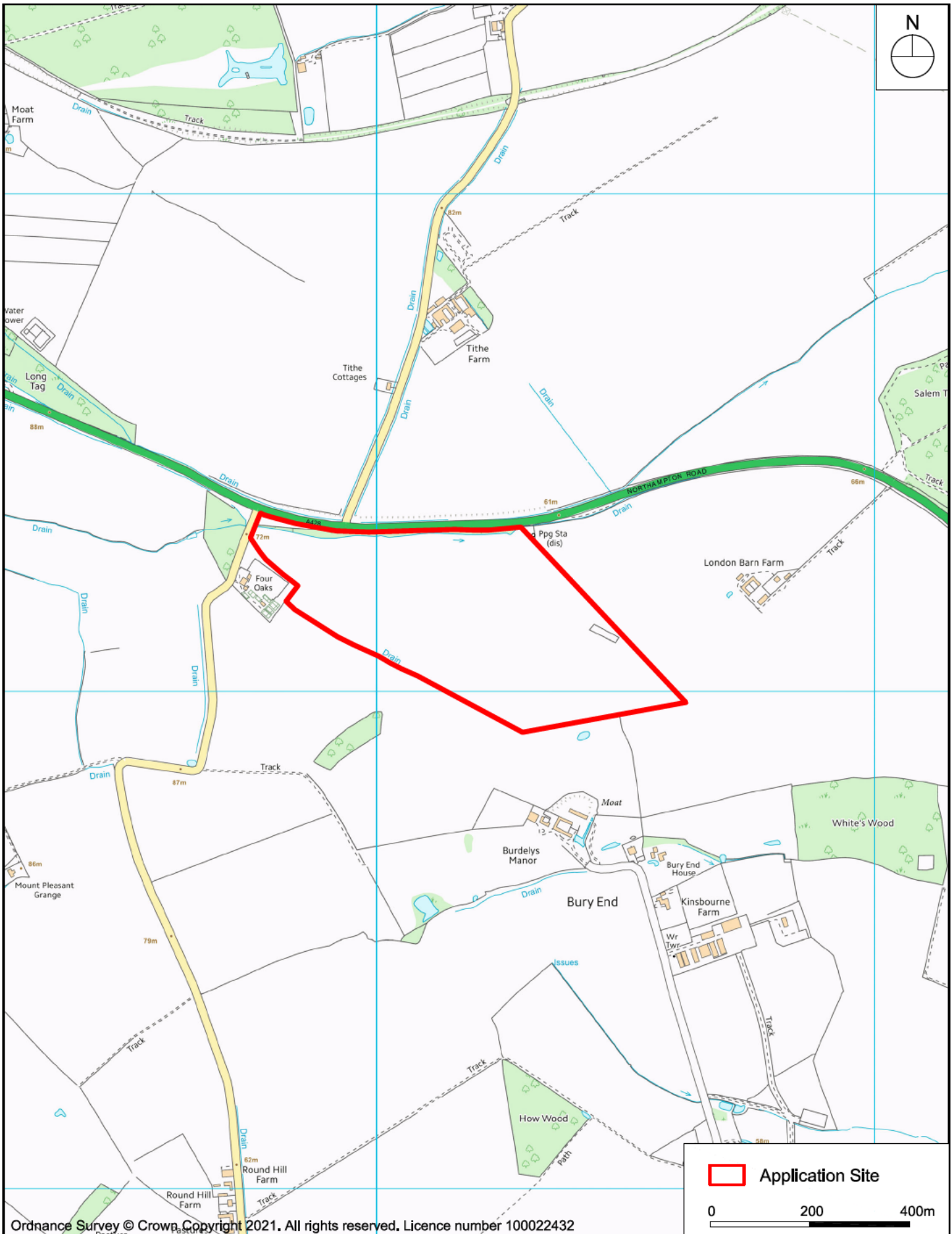
5.12 The Council's assessment states that protected species have been recorded on the site. This could be addressed through an ecology survey and protected species surveys, if appropriate, and the recommendations and mitigation strategy could be incorporated into any development scheme.

**5.13 Economic and Employment Opportunities**

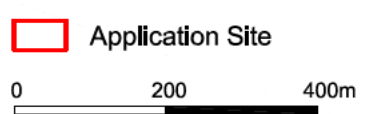
5.14 The site has the potential to increase economic and employment opportunities, which would be beneficial to the local economy. The site could provide for commercial development and employment generating uses.




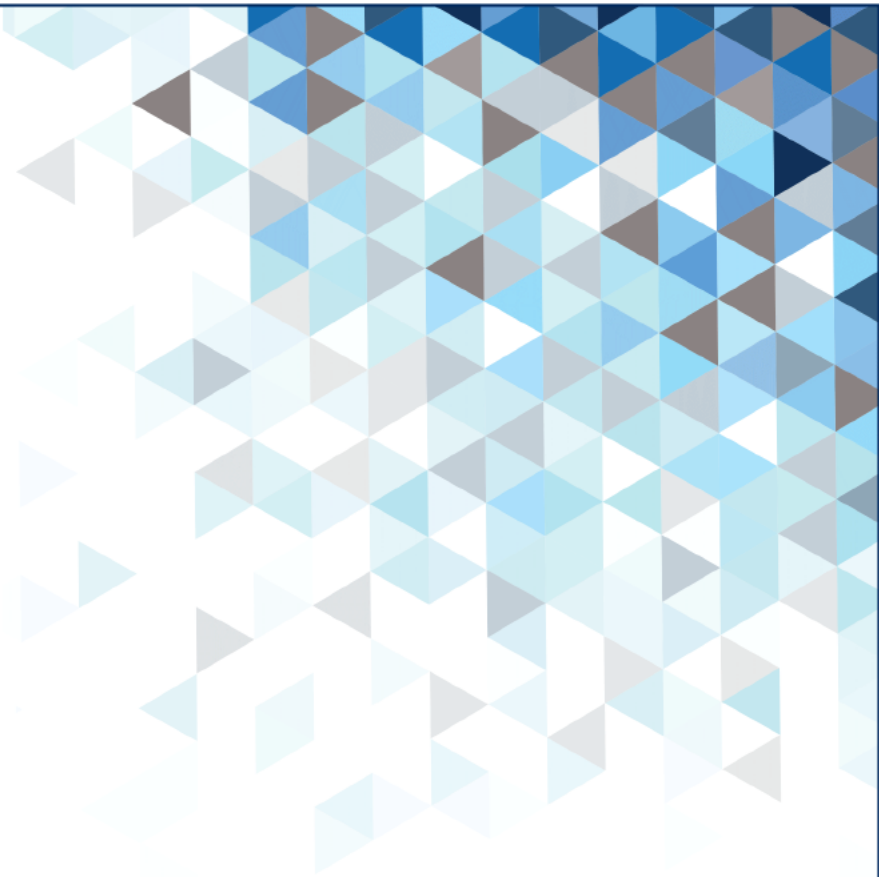
**Appendix 1 Site Plan (with Existing Call for Sites Ref Number)**



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CLIENT [REDACTED]	DATE 16.08.2021	OS REF 498192, 251142	DRAWN BY PMG	<b>DLP PLANNING LIMITED</b> 4 Abbey Court, Fraser Road, Priory Business Park Bedford, MK44 3WH	
	SCALE 1:10,000 @ A4	DRAWING NO D01	CHECKED GF		
PROJECT Land at Northampton Road Stagsden	JOB NO BE1613	REV A	† 01234 832 740 f 01234 831 266 e bedford@dipconsultants.co.uk Offices also at: Bristol, East Midlands, Leeds, London, Milton Keynes and Sheffield		
	DRAWING TITLE Location Plan Call for Sites ID: 1389				



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