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TwinWoods Garden Community

Representations to the Bedford Borough Council Local Plan 2040: Plan for Submission consultation

Bedfordia Developments Ltd and Marcol Industrial Investments
LLP

July 2022

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1.0 Introduction

- 1.1 This consultation response is made on behalf of Bedfordia Developments Ltd and Marcol Industrial Investments LLP who in combination control the land to the north of Bedford known as ‘TwinWoods’. The representations have been prepared by Lichfields with inputs from Vectos, the transportation consultancy.
- 1.2 This document comprises a formal consultation response to Bedford Borough Council’s (“the Council” or “BBC”) Regulation 19 ‘Local Plan 2040: Plan for Submission consultation’ (“the emerging Local Plan”) which launched on 15th June 2022 and runs to 5pm on Friday 29th July 2022. It provides supplementary information to that provided on the online consultation system.
- 1.3 This response builds upon other reports and representations previously submitted by Lichfields on behalf of Bedfordia Developments Ltd and Marcol Industrial Investments LLP throughout the Local Plan process, including: a Regulation 18 response to the Strategy Options and Draft Policies consultation (June to September 2021); Feasibility Study Report submitted in February 2021; Heritage Impact Assessment submitted in March 2021; Regulation 18 response to the Issues and Options consultation (June to September 2020); and initial Call for Sites submission (August 2020).

Structure of our response

- 1.4 TwinWoods is not included within the emerging Local Plan, which instead proposes the allocation of a new settlement at Little Barford for 4,000 homes (3,800 in the plan period) and around 4 hectares of employment. In this context, our consultation response focuses on **three principle matters** that we have identified following a review of the emerging Local Plan and its supporting documents:
- **Section 2.0** reviews the assessment of TwinWoods in the ‘New Settlements Assessment’ (April 2022) document and whether this represents a fair and accurate analysis of the site. In particular, this also looks at the deliverability and sustainability conclusions of the proposed new settlement at Little Barford relative to TwinWoods.
 - **Section 3.0** considers the location of the proposed new settlement at Little Barford on the eastern edge of the borough, and whether the strategic cross-boundary effects on neighbouring authorities have been adequately assessed in terms of deliverability, transportation and social infrastructure.
 - **Section 4.0** looks at the emerging spatial strategy and considers whether analysis and evidence has gone far enough to understand how the significant opportunity for development to the north of Bedford can be unlocked, specifically with regards to highways and sustainable transport mitigation.

TwinWoods

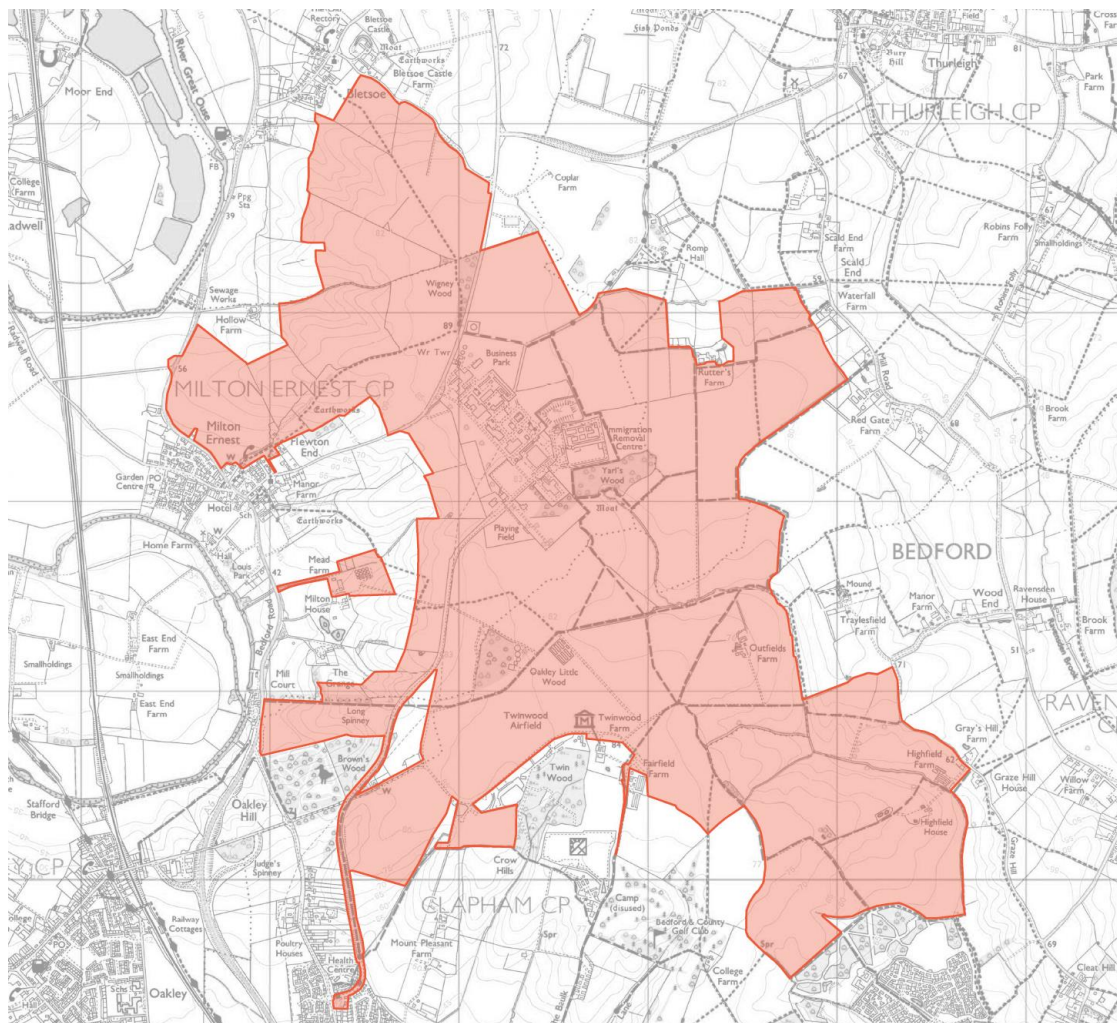
- 1.5 The location of land controlled within the site known as TwinWoods Garden Community is shown in Figure 1.1. TwinWoods is a potential new settlement of around 860ha which has the potential to accommodate c.6,000-7,500 homes and employment space to facilitate

2,000-4,000 jobs. The higher end of the housing and job capacity range represents the development of TwinWoods with a new train station on the proposed East West Rail (EWR) line, although the site is equally deliverable without a direct rail connection.

1.6 The TwinWoods scheme is based on key sustainable travel principles at its outset, with access to a frequent bus service along the A6 and close proximity to Bedford providing potential for good active travel links to the northern edge of the town. The TwinWoods masterplan options included within the Feasibility Report (February 2021) reflect the ability to provide a self-contained and self-sufficient community with all day-to-day facilities accessible within 20-minutes by active travel. It is hence designed to be a truly liveable community.

1.7 The scale of the site also provides the opportunity to deliver a wide range of homes across all tenures and types, alongside the provision of a wide range of new and improved infrastructure to mitigate its impacts and create a vibrant and well-served community. The site benefits from only two landowners who are promoting the scheme, and there are no promotion agreements in place that would affect its deliverability.

Figure 1.1 Site Location - Land controlled by Bedfordia Developments Ltd and Marcol Industrial Investments LLP



2.0 The New Settlements Assessment

2.1 The Plan for Submission consultation is supported by a 'New Settlements Assessment' (April 2022) which sets out the proposals for the four new settlements that have been considered throughout the Local Plan process, provides an appropriate framework for their assessment and then carries out that more detailed assessment. This includes an analysis of each site against the Sustainability Appraisal methodology, where relevant to new settlements.

2.2 The 'Development Strategy Topic Paper' (May 2022) subsequently explains the reasons for the chosen spatial strategy in the emerging Local Plan, including why other sites have been discounted. This paper concludes that Little Barford is considered to be the most deliverable and sustainable new settlement option, and summarises the findings of the New Settlements Assessment as follows:

The paper concludes in relation to the Colworth and Twinwoods new settlements that a key issue for their delivery is the impact of the traffic generated, particularly on the A6 and its junctions for which no proposals for an effective solution have yet been brought forward. It found that the key issue for the Wyboston and Little Barford proposals is coordinating their delivery with the delivery of significant new infrastructure nearby (the planned East West Rail project and the A428 road improvement scheme) and securing good links to St Neots.

*The sustainability appraisal then tested all of the sites against the sustainability appraisal framework which showed that both Little Barford and Wyboston perform better than both Colworth and Twinwoods. The Little Barford proposal has advantages over Wyboston because it is more conveniently located to the planned East West Rail interchange and avoids the loss of high-quality agricultural land.' (*Emphasis added*)*

2.3 However, following a review of the New Settlements Assessment, we find that it is inconsistent in its approach and does not represent an accurate and objective assessment with regards to TwinWoods. Further, in comparison to Little Barford, the significant benefits of development at TwinWoods are not properly reflected within the rating for each sustainability objective (a summary of which is provided in Table 2.1). This is explored further below, in line with each relevant assessment criteria.

The Assessment of TwinWoods and Little Barford

Housing

2.4 The discussion on this criterion notes that TwinWoods does not give consideration to custom/self-build housing and the scope for modern manufacturing techniques. However, as specifically stated within the formerly submitted Feasibility Report, a wide choice of homes across all tenures will be achieved at TwinWoods to meet local needs, including space for self-build housebuilding opportunities to encourage longevity in the community. The scheme would also be delivered in line with any relevant Local Plan policies, such as draft Policy DM5 which would require a proportion of new housing developments to provide custom/self-build housing plots.

- 2.5 The provision of custom/self-build housing is the only issue raised within this topic for TwinWoods. In comparison, the assessment for Little Barford states that the site is located on the edge of the borough and therefore overlaps with the St Neots housing market area (HMA). As a result, it is likely that a significant proportion of homes provided by the new settlement will contribute to the housing needs of St Neots as opposed to the needs of the Bedford HMA – undermining the efficacy of this spatial strategy in meeting the borough’s planned housing requirements.
- 2.6 The assessment for Little Barford also acknowledges that due to its geographical proximity to St Neots, pressure would likely be placed on services and facilities outside of the borough in the short-term, and that this impact has not been assessed by the site promoter. Firstly, the pressure on services and facilities outside of the borough – particularly on St Neots – will not just be a short-term issue; this pressure would worsen as more homes are delivered at Little Barford over the course of the plan period, increasing the population in this locality and therefore the need for supporting infrastructure including schools, health facilities, community spaces, outdoor open space and retail.
- 2.7 Further, the analysis indicates that the cross-boundary implications of a new settlement at Little Barford on Huntingdonshire/St Neots have not been considered sufficiently in order to understand the social and community infrastructure that may be required to support this growth strategy. As set out within the New Settlements Assessment, one of the key qualities of a garden/new settlement community is that it supports the necessary infrastructure to allow the community to function self-sufficiently on a day-to-day basis, and it is not presently clear that this will be the case for Little Barford, where – even if it was able to provide sufficient infrastructure – residents may still choose to travel to St Neots given its proximity. This is discussed further in Section 3.0.

Employment

- 2.8 The commentary on this topic, while clearly positive in general, seeks clarification as to whether the existing employment area within TwinWoods would be retained or redeveloped. The existing employment area within the site itself consists of the former RAE Bedford research site, which now contains TwinWoods Business Park. This offers a mixture of commercial, office, industrial and warehouse space with immediate access to the A6. Among other occupiers, the site accommodates the Earl’s Wood Immigration Removal Centre and Red Bull Racing.
- 2.9 As set out within the Feasibility Report, it is currently envisaged that Earl’s Wood and Red Bull will be retained and that provision of a new mixed-use employment area within the development – comprising managed workspaces, incubator units, research and development facilities and advanced manufacturing – would meet the needs of any other occupiers to ensure continuity of existing employment in the local area. There is also the benefit of existing and proposed employment provision to the north of TwinWoods at Thurleigh Airfield Business Park and Colworth Science Park, providing further opportunities locally to the site in the early phases of development.

Green infrastructure and biodiversity

- 2.10 We consider that this topic is particularly inconsistent in its analysis. It recognises that the TwinWoods scheme will retain areas of woodland within a large central green space,

alongside the creation of additional green and blue corridors to increase biodiversity. However, the assessment goes on to state that *'such a large site should include provision for strategic open space / green infrastructure to provide for recreational activities to limit the diffuse pressure on SSSIs in the wider area'* and that *'further investigation is needed of the site's biodiversity interest and mitigation measures should be proposed'*.

- 2.11 We recognise the issue of recreational pressure on open/green spaces in the area – now more than ever in the aftermath of COVID-19 – with many existing sites of value for nature already heavily used for a range of recreational activities. However, the extent of land ownership means that TwinWoods is able to go above and beyond and deliver green infrastructure far in excess of policy requirements. The scheme has the ability to provide up to 58ha of green space including parks and gardens, pitches and allotments, as well as offering the potential to bring additional open space that is currently not accessible into public use and relieve pressure on other, heavily used facilities.
- 2.12 There are also aspirations to 'twin' the two ancient woodland areas within the site, in order to create a sizeable 'green lung' through the heart of the community early in the development. This would provide a substantial amount of green space for the wider community and healthier living for residents through access to nature and potential for growing food, all within a walkable neighbourhood which reduces the need to travel by car. Alongside the provision of secondary green and blue corridors, this will also increase biodiversity, create clean air and control water flow. While there are a range of species inhabiting hedgerows and woodland in the site, the scale of the site means that some of these can be left undisturbed, plus suitable mitigation can be provided.
- 2.13 The analysis on this criterion also states that *'Hydrological surveys would need to be undertaken to look at impacts from nearby River Great Ouse'*. These impacts would be assessed as part of more detailed work, however there is no reason to suggest that any potential impacts on the river could not be suitably mitigated (the specifics of which will be revisited as further technical work is carried out and there becomes more certainty on design for all aspects of the development).

Heritage

- 2.14 The impact of development on heritage assets is noted as a key issue in the assessment conclusion for TwinWoods which needs further investigation. In overall terms, the Council acknowledges that there are unknowns, such as the contribution made by the site to the setting and significance of some heritage assets and the extent of retention of assets within the site. The Council concludes that there is the potential for substantial harmful effects. However, it is not possible to draw this conclusion with any certainty without carrying out further detailed assessment work.

Bletsoe Castle Group

- 2.15 These heritage assets to the north of TwinWoods comprise Bletsoe Conservation Area, Bletsoe Castle (Grade II*) associated Barn, St Mary's Church (Grade II*) and several other listed buildings within the village. The assessment considers that there may be an impact on their setting. Whilst the red line of the site is in close proximity to these assets, the proposals for this area demonstrate that it would act as a green buffer aside from the playing pitches. These heritage assets derive some significance from their rural setting, but

this must be seen relative to their overall significance which derives primarily from the architectural and historic interest of their built fabric. There is potential for some of the surrounding rural land to have historic associations with the heritage assets, however given that much of the land closest to the assets will remain rural in character, it is unlikely that there will be non-visual impacts on setting. The main development areas of housing and employment would also be a considerable distance from, and unlikely to be highly intervisible with, the heritage assets. The potential for the development to harm the significance of these assets is therefore considered low and subject to careful design and mitigation, development could come forward which has little material effect on their setting or significance.

Milton Ernest Group

- 2.16 There would be a substantial distance between the developed areas of the site and the Milton Ernest shrunken medieval village Scheduled Monument ('SM') and listed buildings within Milton Ernest, including the All Saints Church (Grade I) and Stone Cottage (Grade II). These heritage assets derive some significance from their rural setting and the nearby fields contribute to this. However, the distance between them and the areas of the site which are proposed for development means a substantial degree of rural countryside would remain around the eastern side of Milton Ernest. Whilst the wider countryside may contribute to a minor degree to their setting and significance, this is negligible relative to their immediate setting.
- 2.17 Furthermore, this rural setting is already critically affected by the presence of the industrial park and the associated large buildings, which are incongruous in the open countryside and mean that this area contributes a much lesser extent to the heritage assets' setting or significance. The substantial tree buffer proposed at TwinWoods would reduce intervisibility between the heritage assets and the development, further sustaining the current rural setting. The tree buffer itself would also be consistent with the overall landscape character. Whilst some of these heritage assets are within the site, it is clear from the emerging proposals that development can be located sensitively, and a considerable distance away from these heritage assets, in order to ensure their significance is preserved.

Heritage Assets Within the Centre of The Site

- 2.18 'Yarl's Wood Hermitage and moated site' is a SM located within the centre of the site. It sits within a small wood, which is proposed to become part of a newly planted larger woodland spine. The SM is largely well preserved and partial excavation has revealed the form of buildings occupying the site. The associated fishponds and parts of the moat contain waterlogged silts from which information relating to the medieval environment and the economy of the site may be recovered. The setting of this asset comprises the other farm buildings and a well-wooded boundary with hedgerows which mostly screen the main area of the asset from views into the former farmstead area.
- 2.19 Due to the nature of the asset, the setting is localised and comprises the immediate topographical elements. As the SM's significance is almost entirely found in its archaeological and evidential value, the value it derives from its further setting is limited. The development proposals at TwinWoods would not affect this immediate setting and whilst there may be development near the asset reducing the open space in this area, this

would only take place south-east of the asset. A new woodland plantation would be created to the south of the site which would enhance this aspect of the asset's setting. As a result of the limited impact on the setting, combined with the relatively small scale of the setting itself and the extent that this contributes to significance, the development would be unlikely to have an adverse impact on the heritage asset subject to careful design consideration (and archaeological mitigation, see below).

- 2.20 The Vertical Spinning Tunnel (Grade II) was recently listed in 2019 as a rare surviving building type which forms part of the country's post-war aviation research excellence. Part of the Royal Aircraft Establishment buildings, the tower is now one of the few remaining buildings and sits within the central area of the site. The setting of the tower will be significantly changed by the development; however this setting has already been altered and it makes an extremely limited contribution to its significance. The building would be retained as part of the proposal, and any surrounding development would be carefully designed with an understanding of the building's significance so as to mitigate any harm to its significance.

Southern Group

- 2.21 The assessment states that harm to Highfield House (Grade II) could be substantial due to loss of its surrounding rural setting. This is an incorrect assessment and greatly overstates the level of harm. Highfield House is a farmhouse with associated outbuildings which sits within a large garden area surrounded by much larger, agricultural fields. Its significance derives from its architectural and historic significance primarily due to its age, being constructed in the 16th century and the interest associated with buildings of this period such as their traditional craftsmanship and illustration of the past, particularly of domestic and farm life. Its rural setting, although now intensively farmed and likely to have changed considerably, makes some contribution to its significance, although the majority of this significance still resides in its built fabric. The building would be within the red-line of the site, albeit emerging plans indicate that development would leave a substantial buffer between the farmhouse and the nearby proposed houses and primary school. A woodland plantation would also provide adequate mitigation to reduce visibility. As the house would retain a considerable degree of its existing setting, the contribution of the setting to significance is unlikely to be affected and the farmhouse would still enjoy a considerably strong relationship to the surrounding agricultural landscape. Due to the limited degree in which the surrounding rural farmland contributes to the asset's significance, it is unlikely that this would be harmed with the provision of an adequate buffer and tree screening.
- 2.22 Similarly, this is why there would be limited impact on nearby Grays Hill Farmhouse and Graze Hill House (both Grade II).

Eastern Group

- 2.23 These assets comprise Traylesfield Farmhouse (Grade II), Northern and Eastern Barn at Rutters Farm (Grade II), Romp Hall (Grade II), 8 Mill Road (Grade II) and Waterfall Farmhouse (Grade II). The assessment states that these assets would likely be harmed due to loss of positive open space. We disagree with this assessment as there would be a substantial buffer between the site and these assets, and the degree of open space surrounding these assets which makes a genuine contribution to their significance will

generally be preserved. The loss of open space further from their immediate setting is unlikely to have a material impact on significance. Fundamentally, the degree to which these assets may be affected can be appropriately managed as proposals develop and careful design and mitigation can ensure their settings are preserved.

Archaeology

- 2.24 Any archaeological remains which survive on the site are likely to be of low (local) heritage significance, as indicated by the baseline conditions. Nearby archaeological excavation has indicated that in some areas subject to intensive modern agricultural activity these remains may be partly or several truncated.
- 2.25 In order to avoid adverse impacts or harm to any buried remains within the site, it is recommended that an appropriate buffer zone of no development is agreed with the Senior Archaeological Officer at the Council for the two SMs that are included within the site boundary. This would protect any associated buried remains and respect their historic rural setting.
- 2.26 Pre-determination archaeological evaluation may be required and together with appropriate mitigation, the archaeological impacts can be reduced or avoided.

Summary

- 2.27 There is a consistent degree of overstated harm within the Council's assessment of heritage for TwinWoods, which assumes that development close to heritage assets will erode rural setting and thus cause harm to the significance of these heritage assets. The contribution to which setting contributes to significance must be carefully considered and the emerging proposals for TwinWoods have been developed with regard to these settings at this stage.
- 2.28 A detailed development proposal could come forward that ensures the setting and significance of the heritage assets would largely be preserved (subject to careful detailed design going forward and a full assessment of the heritage asset's significance and settings). Furthermore, an allowance is made within the National Planning Policy Framework ('NPPF') that where harm is caused to heritage assets, this harm may be justified if outweighed by public benefits. It is our view that – at this stage – the historic environment should not be a reason to refuse the allocation of the site for development. While we disagree on many of the Council's assessments of potential harm, this response alongside the emerging development proposals demonstrates that even if harm is caused by the proposal following detailed design work, this harm could be avoided, mitigated or outweighed by substantial public benefits.
- 2.29 As set out in The Historic Environment Partnerships 'Site 883 Land at Twinwoods, Bedfordshire Heritage Impact Assessment' (March 2021), we conclude that:

‘...it has been demonstrated though the historic and archaeological background of this report that human activity and settlement have been undertaken across the site and the study area since the prehistoric period. Proposed future development on Site 883 Land at Twinwoods can be seen as a continuation of this long history of human settlement and activity in the landscape here. It has been set out in the recommendations above that there are appropriate mitigation measures which will preserve the setting and heritage significance of nationally important assets in the site and study area, and also that the site provides a number of opportunities to connect the future residents of the Land at Twinwoods with the historic and natural history of the site, and those who came before them.’

Community, educational and shopping facilities

- 2.30 The TwinWoods Garden Community includes proposals to deliver a range of supporting infrastructure to create a balanced and well-served new community. This comprises nurseries, four primary schools and one secondary school, as well as a town centre with the expectation of a large ‘anchor’ food store alongside a broad mix of retail and employment space. Several local centres are also incorporated within the masterplan to provide for the day-to-day needs of the community, including employment space, retail, mobility hubs, community halls, and GP and dental surgeries.
- 2.31 In this context, the Council’s assessment for TwinWoods states that *‘It is not likely that social and community infrastructure will be delivered before the occupation of the first dwellings’* – with no further commentary explaining which forms of infrastructure this relates to, or indeed a justification as to why this would be required. As detailed within the Feasibility Study (which specifically focuses on infrastructure and implementation of the proposed scheme), the anticipated timescales for the delivery of TwinWoods will be driven by a number of factors, including the lead-in time (how long it takes to get necessary permissions and open up the site for development) and the strategy for delivery of the different components (the timescales for homes, employment premises, other buildings and all supporting infrastructure to be built). Timing of key infrastructure items is also key to ensuring that the scheme is financially viable and therefore deliverable.
- 2.32 For instance, in relation to primary and secondary education provision on the site, there are some surplus places in nearby villages at Oakley and Sharnbrook, and the timing and phasing of any new facilities must be carefully considered to ensure that delivery ties in with the need generated by the development. This could include delivering the secondary school in phases so that the quantum of forms of entry (FE) builds up over time as the wider development builds out. Further, the timing will be subject to refinement depending on the type of development coming forward; phases where homes are predominantly flats may not require significant school capacity whereas phases which comprise predominantly family housing will likely require the co-ordinated delivery of schools alongside.
- 2.33 Other community and social infrastructure would be expected to be delivered alongside residential development, as is typical of large-scale developments. This would include the delivery of mixed-use areas and the town centre, including new community spaces, in the early phases of development to support and meet the needs of early adopters.

Transport – access and traffic generation

- 2.34 The leading comment on transport states that traffic generation and impact is yet to be assessed by the promoter using the Council’s highways model.
- 2.35 The previous supporting technical documents produced by Vectos in support of the TwinWoods promotion included a highly detailed trip generation exercise. The Movement Analysis Paper (MAP, April 2021) provided a summary of the likely and realistic trip patterns associated with the proposed TwinWoods Garden Community development with reference to the overarching Transport Strategy that would be implemented. Assessment years of 2030, 2040 and 2050 were considered, which is consistent with the Bedford Borough Transport Model (BBTM) reference year. Detailed discussions were held with the Council’s modellers AECOM, and a proposal was obtained to run the TwinWoods bespoke trip generation through the BBTM.
- 2.36 All relevant information required to run the bespoke trip generation undertaken by Vectos through the BBTM was in place within the timeframe to support the site promotion for the Regulation 18 consultation (June to September 2021). This process was dependent on agreement of the trip generation set out within the MAP with Highway Officers at BBC, which became protracted. At a meeting with key Planning Officers in April 2021, the Council advised that there would be no benefit in pursuing the TwinWoods bespoke trip generation through the BBTM prior to the consultation deadline, and that the level of detail included for the TwinWoods settlement already being run in the model was sufficient for this stage of the Local Plan process. As such, TwinWoods was included in the BBTM model runs as a part of the Council’s site selection process; however, this did not acknowledge the Vectos TwinWoods trip generation and instead ran scenarios produced by BBC through AECOM.
- 2.37 Vectos responded to the Regulation 18 consultation including detailed responses to the BBTM technical documents produced by AECOM, and have raised a number of crucial concerns with the interpretation of results and application to the site selection process. As such Vectos have serious concerns over running the bespoke trip generation for TwinWoods through a model that is being used in an inappropriate manner or Local Plan site selection.
- 2.38 Vision & Validate (V&V) is an expression coined to represent current planning policy expressed in the NPPF. It is also known as Decide & Provide (D&P)¹. The labels have been applied to distinguish the approach from the discredited and abandoned, except in particular circumstances, Predict & Provide (P&P) approach which places road capacity and facilitating convenience by car use above all else. This is the approach used by BBC in their interpretation and application of the BBTM evidence.
- 2.39 DfT Paper ‘Decarbonising Transport’ (July 2021) endorses the V&V approach:
“We need to move away from transport planning based on predicting future demand to provide capacity (‘predict and provide’) to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes (sometimes referred to as ‘vision and validate’).”
- 2.40 In the context of V&V over P&P, the BBTM is not, in isolation, a suitable tool upon which a balanced planning judgement should be made. This ignores mobility as a whole, and is not

¹ http://www.trics.org/img/trics%20dp%20guidance_web.pdf

policy compliant in the context of the Climate Emergency declared by the Council. Leading transport guidance – amongst many other things – includes a commitment to embed transport decarbonisation principles in spatial planning and across transport policymaking, and accelerate modal shift to public and active transport (Department for Transport paper: Decarbonising Transport published in July 2021²).

‘A number of accesses are achievable, but more work is required to understand which are likely to operate in the future and how the proposed pedestrian and cyclist infrastructure would serve its purpose’

- 2.41 In terms of vehicle access, access is proposed at a number of locations and primarily from a new road link forming a bypass for Milton Ernest. This would re-route the A6 through TwinWoods thus providing a significant benefit to the residents of the village of Milton Ernest, returning the village to a rural, undisturbed settlement.
- 2.42 Proposals to support high levels of pedestrian and cyclist movement are reflected in the Transport Report (October 2018) produced by Vectos which contains a detailed mobility section highlighting the feasibility of delivering a new self-sustaining town, and thereby achieving a low external car driver mode split. This includes details of designing for localisation in the first instance, as well as a package of mobility measures including Mobility as a Service, bike sharing, active travel corridors, community hubs, personalised travel planning and demand responsive transport. Active travel routes and corridors are proposed to be designed to the highest standard, thus maximising on movement by these modes by removing many of the typical barriers to these modes of travel. A highly attractive active travel corridor (traffic-free) is proposed between TwinWoods and north Bedford with supporting dedicated infrastructure on other links surrounding the site, all facilitated through the excellent network within the site.

‘Significant forecast delays and capacity constraints are forecast at the Clapham Road / Manton Lane roundabout in northern Bedford’

- 2.43 The comments raised by the Council regarding the Clapham Road/Manton Lane roundabout are misleading; the issues at the Manton Lane roundabout become ‘significant’ within the BBTM with the inclusion of an additional 10 years of traffic growth excluding potential 2040 allocation sites. The inclusion of this growth is questionable as it means that the mitigation strategy derived through the modelling is one which can only reinforce existing travel patterns and exacerbate car dependence, by continuing to seek to provide capacity for predicted traffic movements. This is very much a P&P approach, and, as identified, is not in line with the direction of policy.
- 2.44 The BBTM is a strategic model which has been designed for the purpose of analysing the traffic performance across the borough for the 2040 Local Plan. This is a Saturn model and given its strategic purpose, it will ‘load’ traffic onto individual junctions in a manner which cannot occur in reality (i.e. this much traffic simply cannot exist within such a time period). The coarse nature of the software means it often overestimates traffic flows at individual junctions and, when closely scrutinised, will therefore forecast chaos in this respect. It

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf

cannot, hence, be relied upon in isolation as a means of informing decisions around the operation of the highway network.

2.45 A microsimulation model is more appropriate for the assessment of TwinWoods and an individual junction or corridor. This would allow for a more reliable analysis of the behaviour of vehicles at the Manton Lane roundabout, by determining the most appropriate highway ‘interventions’. As a result of the greater detail in the model, the outputs are closer to reality than from a strategic model and capacity is more accurately reflected. It is therefore both adequate and proportionate to the task of developing policies for the allocation of TwinWoods in the new Local Plan. As such, its use complies with national policy and is sound in principle.

2.46 As new allocated developments come forward within Bedford, it is hoped they will instead be developed in line with policy aspirations and will buck historic trends in travel patterns. In this case, congestion at the Manton Lane roundabout is unlikely to occur in the fashion predicted by the BBTM.

‘Further mitigation at this junction to alleviate the forecast congestion has not been proposed as part of this study due to the physical constraints at this location. Without further capacity improvements or measures to reduce the forecast traffic at this location, the forecast congestion at this junction is a major constraint on the delivery of growth along the A6 corridor to the north of the borough. The phased introduction of the Milton Ernest bypass may lead to localised traffic impacts in the short-term’

2.47 It is not evident that meaningful alternative measures (to road capacity enhancements) have been identified such as re-allocation of road space to higher capacity modes, and the supporting joined-up infrastructure to make these modes a viable form of travel. This is not tested in the BBTM, although has been suggested by Vectos through discussions and previous responses to the Local Plan consultations.

2.48 Traffic is a function of available road space; at busy times, increasing road capacity generates traffic, and reducing road capacity reduces traffic. Capacity is therefore a tool, and this can be seen by observed effect throughout the country. It is no coincidence that gridlock never occurs on a regular basis.

2.49 The BBTM is demonstrated to be the incorrect tool to accurately forecast traffic impacts on specific junctions, however BBC have used its results to make a planning decision in the absence of a balanced approach. Critically, it is a questionable assumption that drivers will continue to load onto a junction that is operating at capacity without acting to minimise their own inconvenience. This is not realistic and excluding beneficial development on this basis is not in accordance with a balanced approach.

2.50 The Milton Ernest bypass is proposed to be phased in a manner that limits instances of localised traffic-impacts on existing communities such as Milton Ernest.

Contamination and pollution & minerals and waste impacts

2.51 The assessment for TwinWoods flags that there is potential for noise and contamination from existing operations at TwinWoods Business Park and Yarl’s Wood, and states that it is not clear whether these are proposed to continue as part of the development proposals for

the site. It also highlights the presence of an existing *‘Biogen anaerobic digestion plant site, pet crematorium, energy from waste plant and a hazardous waste transfer operation’* and similarly queries whether these will continue as part of the development proposals.

2.52 As discussed earlier within this response, initial feasibility work for TwinWoods is based on the assumption that Yarl’s Wood and Red Bull remain in situ, while the needs of any other existing occupiers within the site will be catered for through the provision of new mixed-use employment space within the development. This will clearly be kept under review, bearing in mind the extended period of build out of any new community. In any event, the TwinWoods masterplan demonstrates that the Garden Community can be designed with regard to the potential effect on any key sensitivities and incorporate measures to avoid/minimise these potential effects – for instance, by locating green buffer zones between homes and Yarl’s Wood and co-locating appropriate uses.

Other considerations

2.53 The overall assessment of the two new settlements for TwinWoods and Little Barford also states that:

- A new settlement vision document for Little Barford has not yet been produced, while *‘a good understanding of the key principles of garden cities is shown’* for TwinWoods;
- No reference is made to the aim to achieve net carbon neutrality at Little Barford, whereas work undertaken for TwinWoods has demonstrated that the site *‘will embrace different routes to achieving a net zero carbon development’*; and
- No reference is made to electric vehicle charging at Little Barford, while the transport strategy for TwinWoods specifically includes electric vehicle charging points, as well as cycle vouchers, bike sharing, bus travel passes, car clubs, car-pooling, connected automated vehicles and the use of personal travel plans.

Sustainability Objectives

2.54 Table 2.1 provides a summary of the rating for each sustainability objective for TwinWoods and Little Barford, as set out within the New Settlements Assessment. While TwinWoods scores the same – or in fact higher – than Little Barford in relation to 12 of the 15 sustainability objectives, the assessment indicates that Little Barford performs better than TwinWoods in relation to air quality, carbon dioxide emissions and travel objectives. However, for some objectives there is no justifiable reason given as to why Little Barford should score higher than TwinWoods, or indeed why TwinWoods should score so negatively. Further, the commentary is almost identical for both new settlements on certain objectives, but with TwinWoods then scoring lower.

2.55 We consider that this does not present a fair and subjective assessment with regards to the new settlement options, and it appears that the scoring is somewhat contrived to bolster the planning and sustainability case for Little Barford. This is explored further below.

Table 2.1 Summary of the rating for each sustainability appraisal objective as shown in the Council's New Settlements Assessment (April 2022)

SA Objective	TwinWoods	Little Barford
1. Improve air quality	Major Negative (XX)	Negative (X)
2. Protect, maintain and enhance biodiversity and habitats	Uncertain (?)	Uncertain (?)
3. Reduce emissions of carbon dioxide and improve energy efficiency	Major Negative (XX)	Negative (X)
4. Conserve, sustain and enhance the historic environment	Negative (X)	Negative (X)
5. Promote strong, sustained and balanced economic growth, stimulating job creation across a range of sectors	Positive (+)	Positive (+)
6. Promote vital and viable town centres	Uncertain (?)	Uncertain (?)
7. Encourage and support physical activity	Positive (+)	Positive (+)
8. Protect and enhance landscape and townscape character and the sense of place in settlements	Uncertain (?)	Uncertain (?)
9. Maximise development on previously developed land and avoid the loss of high-quality agricultural land	Uncertain (?)	Negative (X)
10. Protect the quantity and quality of water resources	Positive (+)	Positive (+)
11. Minimise flood risk	Positive (+)	Uncertain (?)
12. Promote good quality housing, ensuring an appropriate mix of house types and sizes	Positive (+)	Positive (+)
13. Provide for residents' needs and improve access to community services and facilities	Positive (+)	Positive (+)
14. Promote social cohesion, the prevention of crime and reduce the fear of crime	Positive (+)	Positive (+)
15. Reduce the need to travel and promote sustainable modes of transport	Major Negative (XX)	Negative (X)

- 2.56 TwinWoods is proposed to be a new town that consumes much of its own movement in the same way as an established town does, but better. It does this through careful design, accommodating features which make liveable towns successful and futureproofing for changing attitudes to local living and emerging innovations. One of the key benefits of the TwinWoods scheme therefore is its ability to internalise movement and not be solely reliant on the existing network.
- 2.57 In transport modelling terms, TwinWoods is not considered in the context of a new self-sustaining town, but instead as only additional housing attracted to Bedford and beyond. This is an archaic view of development, not reflective of what is proposed at TwinWoods, and contradictory to the Council's own visions and objectives.
- 2.58 Further, the notable benefits of TwinWoods have been discounted for simply the BBTM results. Where movement will occur outside of the settlement, its proximity to Bedford provides potential for good active travel links to the northern edge of the town in conjunction with access to an improved and frequent bus service along the A6. This provides the basis for the site to deliver an excellent interconnected network which will promote sustainable transport and move away from an over-reliance on private car usage. A shift towards cycle and pedestrian routes can be prioritised and the ethos of the development is that of a '20-minute town', with all day-to-day facilities accessible within 20 minutes by active travel. Even without the provision of a new train station on the EWR line, TwinWoods would act as a market town for surrounding villages and be a truly self-contained and largely self-sufficient settlement with its own jobs, shops and services, reducing the need for residents to travel outside of the Garden Community.

- 2.59 This is acknowledged within the sustainability assessment for TwinWoods, however the analysis repeatedly states that *‘there will inevitably be a substantial number of trips to larger centres for services, facilities and employment resulting in an increase in private car use’* subsequently increasing carbon dioxide emissions and worsening air quality overall. Further, it is suggested that *‘there are still likely to be a substantial number of trips by car for employment and services that cannot be met within the settlement and are not easily accessible by public transport’* – but that *‘the significant employment proposals within the settlement are likely to help to minimise this’*. This discussion is contradictory, and the sites strong sustainable travel credentials are not properly reflected within the scoring (see Table 2.1).
- 2.60 As set out within the supporting Movement Analysis Paper (2021) produced by Vectos, internalisation potential at TwinWoods is 64% across the day based on the reported trip generation methodology. This is a robust figure, and the level of internalisation at a new town is likely to be higher.
- 2.61 This is based on current thinking on travel as a starting point (accounting also for trends accelerated by the COVID-19 pandemic), making realistic judgements about how travel is changing and how it can be influenced with exemplar design and purpose. There is certainly however further scope to make more ambitious assertions as to travel habits and attitudes to local living in the near future, and indeed reducing the need to travel. TwinWoods must be thought of as a new town, a point which has thus far been ignored.
- 2.62 In addition, the analysis for Objective 6 – promote vital and viable town centres – states that the size of the town centre proposals means that residents will inevitably travel to other town centre services. While some wider retail needs will likely still be met in Bedford, TwinWoods will deliver a large mixed-use town centre incorporating a large ‘anchor’ food store and a wide mix of retail and employment space, alongside several distinct local centres which will provide for day-to-day services. In comparison, the assessment for Little Barford confirms that no central town centre is envisaged in the new settlement, which will only be supported by small scale convenience shops and cafes. The scoring on this topic does not therefore reflect these considerations, with both new settlements rated the same, and should be revisited.

New Settlement Assessment: Conclusions

- 2.63 Fundamentally, the assessment concludes that the key issue for TwinWoods – and the reason it has not been taken forward as an allocation within the Local Plan – is traffic capacity issues on the A6 and its junctions, particularly at the Clapham Road / Manton Lane roundabout.
- 2.64 The serious concerns with the application of the BBTM results to the site selection process have been raised in previous consultation representations by Vectos, as well as in this document.
- 2.65 The V&V approach at TwinWoods embraces local policy direction, with provision of everything communities need in 20-minute neighbourhoods, reducing the need for individual travel and developing better places to live. The strategic modelling methodology undertaken through sole reliance on the BBTM results has not and does not do this. It appears to be a stand-alone traffic-based exercise with some adjustments made for limited

mode shift. For this reason, the modelling results are not appropriate to make planning decisions in isolation.

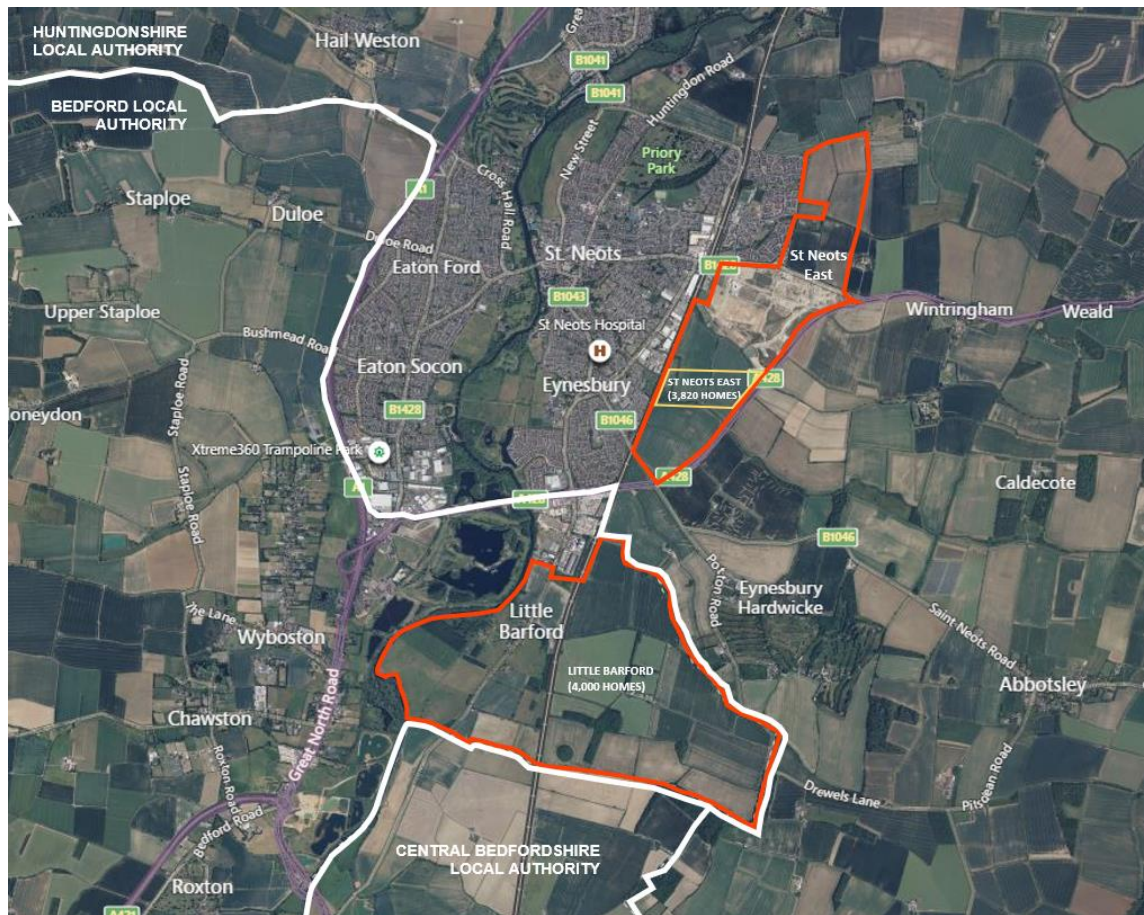
2.66 Using the P&P modelling results as a pass/fail for development on solely highway capacity terms is the antithesis of BBC's own aspirations for sustainable growth.

2.67 TwinWoods is designed as a new town and must be thought of as such. This is not factored into the modelling nor into the New Settlement Assessment and thus significant benefits from the scheme have been overlooked.

3.0 Location of Little Barford and Cross-Boundary Impacts

3.1 The Local Plan 2040: Plan for Submission shows the proposed site allocation of the Little Barford new settlement (Policy HOU19). As shown in Figure 3.1, the proposed new settlement is located on the very eastern edge of the borough, adjacent to the administrative boundary of BBC’s neighbouring authorities Huntingdonshire District Council (HDC) and Central Bedfordshire Council (CBC). Where new development is proposed adjacent or near to the boundary with other local authorities, it is important that the combined effects are taken into account. The location of Little Barford therefore raises questions around the impact outside of the borough and whether the evidence base has adequately considered the transportation and infrastructure requirements that may be required to support the chosen growth strategy, as per the NPPF paragraph 24 and the legal Duty to Co-operate.

Figure 3.1 Location plan of Little Barford and St Neots East, relative to local authority boundaries



Source: Lichfields, based on BBC Local Plan draft Policy HOU19 and HDC Local Plan Policy SEL 2

3.2 Huntingdonshire district’s Local Plan was adopted in May 2019 and a central part of the growth strategy is development in Strategic Expansion Locations, which offer unprecedented opportunities for sustainable development. One of these locations is the growth of St Neots East, which allocates 226ha of land for mixed-use development including, but not limited to, 3,820 homes (3,265 in the plan period) and 22ha of

employment. Combined with additional allocations for 220 homes within St Neots, this growth equates to over 17% of the district's allocated housing requirement.

3.3 Figure 3.1 shows the cumulation of the proposed new settlement location for 4,000 homes in Bedford and the allocation of St Neots East for 3,820 homes in Huntingdonshire. It is evident that Little Barford will impact on and relate to Huntingdonshire more so than Bedford, and with significant development already proposed in this area at St Neots, it is particularly important that the cross-boundary implications of the proposed new settlement are taken into account.

3.4 In our response to the previous round of consultation on the Local Plan (Regulation 18 response to the Strategy Options and Draft Policies consultation, June to September 2021), we discussed the evidence base supporting BBC's emerging Local Plan to ascertain whether the cross-boundary implications had been adequately considered. This included the impact of proposed new settlements on traffic outside of the borough, the wider social, economic and environmental impact on neighbouring authorities and strategic deliverability challenges. In this regard, our review found that the evidence base did not provide a clear justification demonstrating that there will be no significant adverse impacts on Huntingdonshire in terms of deliverability, highway mitigation and infrastructure. We indicated that further evidence was needed to show that the proposed new settlements on the eastern edge of the borough – including Little Barford – are achievable, particularly given that significant investment in infrastructure may be necessary in order to deliver development in this area at scale.

The Updated Evidence Base

3.5 In this context, a review of the updated supporting documents does not suggest that these concerns have been addressed and as such it is still questionable whether the evidence base is sufficiently robust in justifying the preferred growth option:

- The **Sustainability Appraisal Report (April 2022)** provides an appraisal of the likely social, economic, and environmental effects of the preferred growth option proposed within the submission plan. As with the earlier, draft version of this report, there is not a clear consideration of the sustainability impacts on neighbouring authorities. While the comments acknowledge that residents of the new settlement at Little Barford are more likely to support town centres and nearby facilities outside of the borough, there is a clear lack of consideration around the potential cross-boundary impacts on Huntingdonshire (or any other neighbouring local authority) within the report. This may be because there is no specific reference to this within the 15 sustainability appraisal objectives, despite the fact that strategic discussions between neighbouring authorities is essential to the delivery of sustainable development.
- The **Duty to Cooperate Position Statements (April 2022)** document outlines the way BBC has cooperated with neighbouring local authorities and other key partners to plan for strategic and cross-boundary matters during the preparation of the Local Plan. Importantly, this document states that:

'At the current stage of plan preparation, which is the publication of the Plan for Submission for consultation, our neighbours and partners are yet to have sight of the

detail contained in the plan's policies and they do not know which sites are proposed for allocation'. (Emphasis added)

As a result, the ensuing position statements for both HDC and CBC simply state that for several important strategic matters – including housing provision, employment provision and transportation – further cooperation will be required ‘subject to the spatial strategy’. The location of housing development will also have implications in relation to other strategic duty to co-operate matters, such as healthcare and education.

- 3.6 The updated evidence therefore suggests that BBC has not cooperated sufficiently with its neighbouring authorities in assessing the cross-boundary impacts of the proposed new settlement at Little Barford. Indeed, as discussed earlier in this response, the New Settlements Assessment states that pressure would be placed on services and facilities at St Neots, but that this impact has not been assessed. Such an approach is not in compliance with national policy (NPPF Paragraph 26) or the Duty to Cooperate, which is a legal duty to engage constructively and actively with neighbouring authorities and other prescribed bodies in planning for strategic matters that cross administrative boundaries.
- 3.7 At this stage of the Local Plan process (Regulation 19), the Council must show that it has engaged with HDC and CBC to determine that Little Barford is deliverable over the Plan period and that the chosen spatial strategy is based on effective joint working across the local authority boundaries. This is particularly important for new settlements which typically constitute a significant proportion of growth, in order to understand the social and community infrastructure that may be required to support such growth strategies.

Transportation and Cross-Boundary Impacts

- 3.8 In addition, from a transportation perspective, the impacts of Little Barford and other developments in this area (Dennybrook) have not been adequately addressed.
- 3.9 The New Settlements Assessment for Little Barford acknowledges that no information is provided by the promoter on traffic generation, however National Highways have commented that the site will have significant impacts on the strategic road network. This is in contrast to TwinWoods which has provided a comprehensive traffic generation and internalisation assessment, as well as a considered initial approach to effecting beneficial changes to the wider movement characteristics in the area.
- 3.10 In terms of connectivity, Little Barford proposes to increase public transport frequency considerably to meet demand and it is stated that consideration will be given to the inclusion of a public transport hub. This is inferior to what is proposed by TwinWoods in the context of mobility and masterplanning, with the proposals for TwinWoods including a network of Mobility Hubs, and a public transport and micro-mobility package considerably further enhanced to be more flexible, with the inclusion of demand responsive transport (integrated through a MaaS solution). This ensures resilience in the post COVID-19 world with respect to changing attitudes to shared and on-demand travel. Further, no information is provided for Little Barford on EV charging or digital future, whereas TwinWoods acknowledges the need for this and goes some way to setting out a strategy.
- 3.11 In terms of the effect on traffic beyond Bedford, one of the key transport metrics analysed ‘cross-boundary impacts’. This is the forecast of vehicle volume to road capacity, measured at junctions outside of the borough. While this metric could provide a valuable insight into

the impact of the proposed new settlements on traffic outside of the borough, the outcome is limited for several reasons.

- 3.12 Firstly, the results for the BBTM Draft Local Plan Assessment ‘red and orange’ scenario reflect the combination of all four new settlements listed above, and not just the Little Barford which has now emerged as the preferred location. This extends to the assessment of transport mitigation; the ‘cross-boundary impact’ is forecast to neither improve nor worsen with the inclusion of mitigation measures, but this includes the mitigation required to support all four new settlements.
- 3.13 Secondly, the results are intended to present the forecast scale of change between the four development scenarios, highlighting the relative performance of the scenarios and not the absolute performance. For the ‘cross-boundary impact’ metric, the data analysed the number of nodes (junctions) where the volume-capacity ratio exceeded 85% (the threshold for which congestion becomes apparent) and varied significantly (over 5%) across the four growth scenarios. As a result of this two-factor approach, the results do not truly reflect the impact on congestion outside of the borough.
- 3.14 The strategic model covers a significant area, and it is not equally calibrated to the same extent throughout, nor is the validation applied consistently. Therefore, having reviewed the BBTM, it is likely that the model will flag more ‘issues’ in and around Bedford than St Neots or Rushden because the level of data used to derive the model is significantly greater in Bedford than any other area included within the modelling. Sites which are further away from Bedford including Little Barford are not being tested on an equal basis and this should be recognised within the modelling.
- 3.15 This is immediately obvious when considering the location of Little Barford in relation to the model simulation network (i.e. the area of detail within the model network). The eastern edge of the site boundary abuts Drewels Lane, this is not even in the simulation area and, as such, a key route out of the development area has not even been assessed within the BBTM. This is inconsistent with the approach adopted for sites closer to Bedford such as TwinWoods.
- 3.16 Routing decisions for Little Barford show that there is significant reliance upon the Barford Road as a distributor link with the development trips drawn to the east and to some extent in to St Neots which are all areas of the model that have not been calibrated or validated and, as such, it is inevitable that these developments will result in fewer issues being identified as a result of the focus of the model.
- 3.17 It is not clear what additional analysis or steps have been taken to identify issues which may occur outside of the extent of detailed modelling or in areas, such as St Neots, where detailed calibration of the model has not been undertaken.
- 3.18 For example, Dennybrook contains more vehicle miles within Bedford than Little Barford. However, this is partly influenced by the fact that a lot of Little Barford Trips exit Bedford immediately east of the development as – across the full simulation area – the difference between the two developments when mitigation is included is less than 100 miles across the entire simulation area and 600 in the PM (in terms of vehicle miles travelled). This is not significant considering the 860,000 to 960,000 miles simulated in total.

- 3.19 The junction delays and capacity analysis show that a significant number of locations where impacts have been identified are at junctions that have not been calibrated within the base model, and so one can only attribute limited weight to the validity of these outputs. This is a fundamental issue with the individual scenario modelling; junction capacity is being used to aid decision-making, but not all junctions are equally calibrated, and no attempt is made in the reporting to highlight this.
- 3.20 As a whole, the Little Barford proposals themselves are, from a transport perspective, pitifully empty, especially in comparison to TwinWoods. It is clear the reason it has been selected is entirely due to the newly released capacity as part of the Black Cat junction improvements, a scheme which formed part of the Oxford-Cambridge Expressway which is now not being pursued.

4.0 Development to the North of Bedford

- 4.1 The Council, in their emerging Local Plan, have essentially declared north of Bedford closed to new development. The reason for this is stated to be due to traffic capacity issues at the Manton Lane/Clapham Road/A5141 roundabout, as perceived through the BBTM results alone. TwinWoods and other development north of Bedford have hence been ruled out based on highway capacity grounds. There is no apparent consideration of measures to overcome these concerns through re-allocation of road space, nor the opportunities to be gained through implementing policy compliant Garden Village principles which are central to the development of the TwinWoods proposals.
- 4.2 The Local Plan has therefore not gone far enough to understand what the solution is to unlock development to the north of Bedford. This is raised above in terms of the moratorium of development along the A6 corridor based solely on the results of the BBTM, which is demonstrated to be an incorrect application of the model and ignores other matters in the planning balance.
- 4.3 TwinWoods is first and foremost designed as an exemplar Garden Community which embodies the placemaking and transport principles of modern policy. This is dismissed in the modelling and New Settlements Assessment.
- 4.4 Limited weight has been given in the Local Plan selection process to alternative mitigation measures to traffic derived from potential developments north of Bedford, and the emphasis has instead been given to the traffic results of the BBTM. No consideration has been made to the potential benefits of reallocation of road space from cars to higher capacity modes, or facilitating a reduced need to travel in the first instance (which is what a new town such as TwinWoods does).
- 4.5 The evidence presented in the BBTM is not to a sufficient level upon which to base planning policy decisions. It fails to identify a number of critical elements which will undoubtedly influence the decision-making process.
- 4.6 There is a failure to consider the relationship between development strategy and mitigation. No regard has been given, within the isolated scenario tests, to understanding which developments are likely to rely on or contribute towards different mitigation measures. Consistent application of certain measures across all scenarios means it is not possible to determine if a development is dependent upon a measure (as a series of measures are included from the onset rather than those which are essential for a development to be delivered). Similarly, where Reference Case mitigation is not yet fully funded or permitted it should be identified as such to ensure that the reliance on mitigation of differing levels of certainty is fully identified within the assessment work.
- 4.7 The strategic model is not, in isolation, a suitable tool upon which judgements about junction capacity can be made but this is not made clear within the reporting. More refined modelling should be undertaken in areas where capacity has been identified as a constraining factor. This refined testing should consider an approach which better reflects capacity (ideally Microsimulation but, as a minimum isolated junction modelling). It should also test how sensitive these conclusions are to other factors such as the omission of the generic TEMPRO growth and/or peak spreading and retiming of trips to allow judgements

on whether mitigation is essential or desirable (i.e. if a modest change in demand negates the need for a scheme, then it can – at best – only be determined as desirable).

- 4.8 Further testing should be cognisant of what it is reasonable and realistic to expect each development to deliver by way of mitigation, uniform inclusion of certain measures which are not yet permitted and/or lack funding for full delivery obfuscates the identification of development impacts, specifically when considering different development specific allocation strategies. More critically, this fails to recognise that each development brings with it unique benefits by way of mitigation strategies, especially if a foundation of mitigation is assumed in each option regardless of whether it can be delivered. Larger developments have the ability to deliver more mitigation without adversely impacts viability, but this has not been considered in the modelling to date.
- 4.9 The V&V approach is unequivocally set out in the Garden City principles (NPPF Paragraph 73c) and endorsed by the industry bodies including the Department for Transport (Decarbonising Transport – A Better Greener Britain), the Royal Town Planning Institute³, the Chartered Institution of Highways and Transportation⁴, the Town and Country Planning Association⁵ and TRICS⁶. Equally, these industry bodies explain that P&P is abandoned and is used to the detriment of planning better places.
- 4.10 Following the V&V approach is in accordance with national planning policy and, especially in light of the changes to the NPPF 2021, it is harder to justify how the P&P approach could achieve all the sustainability and climate change commitments of the Framework, and therefore risks the soundness of the emerging Local Plan.
- 4.11 Whilst it is demonstrated that the BBTM is not the correct tool to accurately forecast traffic impacts on specific junctions, BBC have used its results to rationalise a moratorium on new development to the north of Bedford. The vast benefits of the development proposals appear to have been discarded in lieu of the BBTM results.
- 4.12 It is clear from a wide variety of national planning and transport policy that using highway capacity as a determining factor to new development is outdated, and not sustainable as we move towards the Net Zero targets set out to address the declared Climate Emergency in the UK (and made by BBC). It has been demonstrated that justification for closing north of Bedford to new development such as TwinWoods is flawed in the following ways:
- The function of the BBTM is not to measure individual junction effects, nor is it to be the whole determinant of site selection in the planning process;
 - Alternative measures to increasing road capacity have not been considered, such as reallocation of road space to higher capacity modes, and facilitating a reduced need to travel in the first instance;
 - Traffic and indeed transport is not an isolated topic in development selection; and
 - Highway capacity constraints are not a barrier to development – this follows a P&P methodology rather than a V&V approach as endorsed by DfT as well as other industry bodies.

³ Net Zero Transport (RTPI Research Paper, January 2021)

⁴ Better Planning, Better Transport, Better Places (CIHT, August 2019)

⁵ Garden City Standards – Guide 13: Sustainable Transport (TCPA, September 2020)

⁶ TRICS Guidance Note: On the Practical Implementation of the Decide and Provide Approach (February 2021)

- 4.13 Ultimately traffic is a function of road space, and we design for what we aim to achieve. People act to minimise their own inconvenience and thus in reality gridlock does not occur on a regular basis as people increasingly choose to work remotely, order shopping online, travel at a different time, change modes, etc. When these principles are accepted by decision-makers and the choice is as readily available as jumping in a car, highway congestion is no longer a barrier to the right development in the right location.

5.0 Conclusions

- 5.1 In summary, our review of the emerging Local Plan and its evidence base finds that there are a number of areas that are not legally compliant owing to failure to comply with the Duty to Co-operate or are unsound and need further consideration. The key issues are:
- The new evidence underpinning the chosen spatial strategy (the New Settlements Assessment, April 2020) is inconsistent in its approach and does not represent an accurate, fair and objective assessment with regards to TwinWoods. The significant benefits of the proposal for TwinWoods are not properly reflected within the sustainability framework, and the assessment appears to be somewhat contrived to bolster the case for Little Barford. The assessment is not positively prepared or justified.
 - It is not clear that BBC has – and is – cooperating effectively with neighbouring authorities in assessing the cross-boundary impacts of the proposed new settlement at Little Barford, which is not in compliance with the Duty to Cooperate. In particular, the Council has not shown that it has engaged with HDC to determine that Little Barford is deliverable and will not lead to unacceptable impacts on the adjacent community at St Neots.
 - The TwinWoods development appears to have effectively been ruled out on highway capacity grounds, and there is no apparent consideration of measures to overcome these concerns through re-allocation of road space or the opportunities to be gained through implementing policy compliant Garden Village principles central to the development of TwinWoods. In addition, the BBTM evidence used by the Council in order to assess traffic generation and impact is not, in isolation, a suitable tool upon which a balanced planning judgement can be made; among other things, it uses the Predict & Provide (P&P) approach which places road capacity and facilitating convenience by car use above all else, as opposed to the Vision & Validate (V&V) (or Decide & Provide (D&P)) approach. The V&V approach is unequivocally set out in the Garden City principles (NPPF Paragraph 73c) and endorsed by various industry bodies who have explained that P&P is discredited, abandoned and used to the detriment of planning better places. The BBTM evidence is therefore not consistent with national policy.
- 5.2 While BBC is not currently pursuing a growth strategy allocating TwinWoods, we will continue to promote the site in future iterations of the Local Plan and are keen to work with the Council, local community and other stakeholders to develop a preferred vision for the site to deliver new homes, employment, green space and infrastructure. The site represents a strong opportunity to create a new sustainable settlement and could deliver housing to meet both the short and long-term housing needs which exist in Bedford. It provides a more sustainable location to accommodate large scale growth than Little Barford, and presents an excellent opportunity to grasp the latest trends in travel and design to prepare for current and future attitudes, instead of designing for the past.
- 5.3 Fundamentally, TwinWoods is deliverable, with all of the land in control of the two promoters, and it would involve the re-development of a partial brownfield site. Whilst further work will be needed, the previous consultation responses and supporting documents that we have provided (including a detailed Feasibility Report) demonstrate that TwinWoods is a viable scheme that would support the policy goals of the NPPF.

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