

## HDC's response to the submission Bedford Local Plan to 2040

Huntingdonshire District Council (HDC) welcome the opportunity to comment on the submission version of the [Bedford Local Plan to 2040](#). We appreciate the challenging timescale and circumstances in which this submission Local Plan has been prepared and confirm that we believe the duty to cooperate has been met in terms of engagement between Bedford Borough Council and Huntingdonshire District Council regarding mutual strategic issues. We are pleased to note that the submission Local plan proposes to meet the housing need of Bedford Borough in full and that no request has been made to Huntingdonshire to assist with meeting needs.

We note that delivery of the spatial strategy (option 2bi) is to a significant degree dependent upon delivery of major transport infrastructure, specifically the A428 and East-West Rail. Whilst the Oxford to Bedford section of the East-West Rail scheme is either already in delivery or has a high degree of certainty there is no confirmed route yet for the final section between Bedford and Cambridge. This is the more challenging section and concern is expressed over the flexibility and resilience of the spatial strategy should this final section be delayed beyond the promoted completion date of 2030 or not forthcoming during the lifetime of this plan. While development strategy option 2a performs better than the others against three sustainability objectives, it has not been taken forward in the submission Local Plan due to delivery risks. HDC note the reason for pursuing option 2bi over option 2a but still express concern over the deliverability of HOU19.

The element of the submission Local Plan of most interest and concern to Huntingdonshire District Council is proposed policy HOU19 Little Barford New Settlement which has a gross site area of 310 hectares (126 hectares net). It is located approximately 500m south of St Neots with a proportion of its northern and eastern edges aligning with Huntingdonshire's district boundary, hence its development is anticipated to have potential significant implications for St Neots. The submission Local Plan proposes to allocate the site for at least 4,000 dwellings and in the region of 4 hectares of employment land.

In response to Bedford Borough Council's Draft Plan Strategy Options and Draft Policies consultation last year, HDC supported in principle option 2a (development in and around the urban area, plus A421 transport corridor with rail-based growth – south) and provided extensive concerns and observations regarding development at either Wyboston or Little Barford. HDC objected to option 2c where both were proposed and are pleased to see that the Dennybrook site which was promoted to the immediate west of St Neots is not included within the submission Local Plan as it is anticipated that it would have significantly detrimental impacts on St Neots, Hail Weston and other villages within the vicinity.

Also in response to the Draft Plan Strategy Options and Draft Policies consultation, HDC raised several points of concern and observations about the possibility of a new settlement at Little Barford based on the significant impact on St Neots in terms of substantial landscape impact, risk of coalescence due to the proximity of the site, increased demands on infrastructure, traffic generation, air quality, flooding, climate change and detrimental outcomes for Huntingdonshire residents and businesses. HDC refer to the detailed comments submitted to Bedford Borough Council on 2 September 2021.

HDC appreciates that the proposed wording for policy HOU19 seeks to address many of these concerns by requiring the proposed new settlement to have a distinct identity based on a landscape led approach and to meet various policy criteria. While HDC are broadly supportive of the proposed

policy, there are several points on which HDC would like to make formal representations at this stage.

### **1) Preparation of a strategic masterplan and design code SPD**

The proposed policy HOU19 states that Bedford Borough Council will prepare a strategic masterplan and design code which will be adopted as a Supplementary Planning Document (SPD) in conjunction with the landowners, stakeholders and local community. It also states that planning permission will only be granted following the adoption of the strategic masterplan and design code. HDC support this approach and consider that this is an appropriate approach to plan this new settlement holistically. However, due to the proximity of the site to Huntingdonshire and the strategic cross boundary implications that a new settlement here will have, HDC should be identified as a key stakeholder within the supporting text to ensure the Council is part of discussions around masterplanning. This will work towards addressing any adverse impacts and maximising cross-boundary benefits.

#### Suggested change

HDC be identified within the supporting text as a key stakeholder in the preparation of the SPD.

### **2) Strategic transport infrastructure connectivity and delivery**

Huntingdonshire District Council acknowledge that this site is likely to benefit from being in close proximity to a new East-West Rail route where a new station is expected between St Neots and Sandy and thus has significant potential to incorporate sustainable modes of transport. However, there is still significant uncertainty over the location of the proposed East-West Rail station and when it may be delivered.

The location of existing transport infrastructure such as the East Coast Mainline railway and proposed transport infrastructure such as the realigned A428 and East-West Rail provide challenges in masterplanning the site particularly as they cut through the site at various points. While connections via sustainable and active modes of travel are proposed and sought after in proposed policy HOU19, the feasibility and delivery of these that provide the optimum options for future users is a challenge. This may make achieving criteria xviii to xxi of the policy HOU19 more challenging to meet as transport corridors create physical boundaries between neighbourhoods which due to safety and costs may limit the location and quantity of connections via walking and cycling modes and may reduce the overall sustainability of the proposed new settlement as well connectivity to the wider area.

Page 18 of the [Bedford Infrastructure Delivery Plan: The Need for a Stepped Trajectory – Transport Final Report \(May 2022\)](#) clearly shows that the delivery of the Little Barford site is dependent on major transport work including an East-West Rail connection, widening of the A421, A428 improvements and Little Barford mitigation (bus service between St Neots and Sandy via development). The current level of uncertainty around the location of the East-West rail route and any station gives rise to concerns over potential delays in effective masterplanning of the site, mix of land uses, incorporation of sustainable and accessible transport and its eventual delivery which may lead to delays in adopting the SPD and strategic masterplan. This in turn will delay the submission and determination of any subsequent planning application as proposed policy HOU19 is clear that these will need to be produced ahead of the submission of any planning application.

### 3) Timing of housing delivery

HDC have concerns regarding the deliverability of the Little Barford new settlement. Paragraph 4.92 of the submission Local Plan and the supporting [Stepped Trajectory Topic Paper \(April 2022\)](#) acknowledge that an estimated 3,800 of these new dwellings will be delivered within the plan period up to 2040. The trajectory anticipates delivery builds from 100 dwellings a year in 2030/2031 up to 600 dwellings a year by 2037/2038 and sustaining that level for a further two years. This does allow for some lead in time to prepare the SPD, gain planning approval and put in place necessary infrastructure which will be accessible and operational prior to the first occupation. This is however an ambitious build out rate which very few sites across the country have been able to achieve and sustain as demonstrated in the Lichfield's Start to Finish paper and the Letwin Review of build out rates. To ensure additional certainty and flexibility within the housing supply towards the end of the plan period, additional smaller sites within or adjoining urban areas could be identified.

HDC would support an SPD accompanied by a feasible and realistic phasing and infrastructure delivery plan that has been produced in agreement with stakeholders, developers and infrastructure providers to provide additional certainty over the build out rate of the site with review points over this time to monitor the progress of delivery of not just the number of houses but also the infrastructure that is being built alongside them. This is crucial as HDC are particularly concerned over the feasibility of the Little Barford new settlement being able to provide sufficient infrastructure to meet all locally generated needs and sustain itself. If adequate infrastructure is not provided in the proposed development, this would likely place extra demands on service provision within St Neots to the detriment of their accessibility by local residents. These concerns are exacerbated as St Neots town centre is located 2 miles north of the site whereas Bedford town centre is some 9 miles away. Therefore, it is likely that people will look to St Neots for services.

#### Suggested change

Bullets four and five on page 74 are amended as follows (words in italics and underlined are proposed new text):

- A phasing strategy to ensure that infrastructure investment is provided in tandem with or ahead of the development it supports *with review points to monitor the progress of delivery;*
- An infrastructure delivery plan *produced in agreement with stakeholders, developers and infrastructure providers* setting out the timing, funding, and provision of green, social, and physical infrastructure, including schools, community facilities and local centres in tandem with housing development;

### 4) Proposed land uses

Policy HOU19 states that the site is proposed for at least 4,000 new homes and in the region of 4ha of employment land, there is no commentary within the supporting text of what the upper limit is above 4,000 or 4ha. It is sensible to have some flexibility to allow for a mix of housing types, densities and land uses, but setting a percentage limit, for example no more 5% over the 4,000 could be explored to provide some certainty to HDC and surrounding communities that the Little Barford new settlement will not be a continuously expanding settlement.

In regard to employment land, HDC note that paragraph 4.94 of the submission Local Plan states that *'the proximity of the site to the existing Little Barford employment area to the north offers the opportunity to locate new employment development by way of extension and / or in other areas of*

*the site to benefit the local economy and provide further employment opportunities.* While subject to masterplanning, HDC wish to observe that the location and quantum of employment floor space within the Little Barford new settlement and in combination to the existing Little Barford employment site as well as the two proposed employment allocations (EMP7 and EMP8) located along the A1 corridor immediately south of St Neots may result in harm to the vitality and viability of Established Employment Areas within St Neots. Masterplanning must consider how to promote a sustainable and complementary mix of uses within the site considering the wider area.

The policy requires that the new settlement have multi-functional green infrastructure that under criterion ii *'retains, enhances, connects and increases accessibility to the green infrastructure network including the River Great Ouse...'*; and under criterion iii as part of this network have *'cycling and pedestrian links to facilitate active travel within the neighbourhoods and surrounding areas'*. HDC support this approach but note that there is no approximate quantum of how many hectares of the site will be reserved for green infrastructure and landscaping. At this stage, HDC are therefore unsure whether the provisions within the policy are sufficient to ensure that the quantum and location of green infrastructure will be enough to bring environmental gains as well as act as a sufficient buffer between the Little Barford new settlement and St Neots.

#### Suggested change

That the wording within policy HOU19 regarding 4,000 new homes and 4ha of employment land is tightened so that an upper limit is set, potentially as a percentage.

Policy HOU19 also provide an approximate figure of the minimum hectare of land that will be sought for green infrastructure and landscaping across the site.

### **5) Contingency land**

The proposed realigned A428 route will impact the eastern edge and southern aspects of the Little Barford new settlement. Figure 11 of the submission Local Plan identifies that some land to the east is being safeguarded as contingency land. Paragraph 4.93 states that this land is in the same ownership as the main allocation site and could be used for development, should land be required to facilitate the East-West Rail route and/or station within the site. HDC consider that there should be clarification on what sort of development could be seen on this contingency land as the proposed new A428 route aligns broadly with the boundary of the eastern parcel of contingency land forming a physical barrier which may make connecting residential and/or non-residential development on this contingency land less accessible and sustainable.

#### Suggested change

Amendment to paragraph 4.93 to clarify what land uses could be considered on the contingency land if in the event that it is needed for development.

### **6) Potential impacts on St Neots and infrastructure provision**

#### **a. Landscape and physical impact**

HDC are supportive of the proposed new settlement being planned so that it has a distinct identity based on a landscape led approach but are concerned that there is no direct mention of St Neots

within policy HOU19. This concerns HDC as the proposed Little Barford new settlement heightens the risk of coalescence which must be avoided through measures such as very substantial landscaping including landscape buffers to retain a physical and perceptual separation from Little Barford to St Neots.

Furthermore, within the [Sustainability Appraisal Report \(April 2022\)](#) (SA), there is limited assessment on the impact that such a scale of development could have on existing communities and businesses within Huntingdonshire as well as townscape and landscape character. While it is appreciated that details of any development will be determined throughout the production of the SPD, strategic masterplan and determination of planning applications, additional consideration at this stage would be beneficial to shape these discussions going forward and aid further understanding on the reasons why HDC have these concerns.

#### **b. Flooding and water impact**

Huntingdonshire District Council would like to express concern regarding the potential impact that development at Little Barford could have on flooding and water resources. HDC consider that the proposed policy could go further to address the risk of flooding and the considerable risk that development could increase the likelihood and severity of flooding events further downstream in Huntingdonshire particularly St Neots. The limited assessment of flood risk within the SA under objective 11 '*minimise flood risk*' also heightens the District Council's concerns.

Land to the west of Barford Road toward Wyboston Leisure Park is at a high risk of flooding, therefore large scale development within its immediate vicinity (even if not located on land classified as vulnerable to fluvial flooding) must consider and mitigate the impact it may have on all forms of flooding events in line with national policy. This should also consider the combined flooding impacts of the development with the improvement works to the A428. Mitigation measures must not increase the likelihood of flooding events elsewhere, for instance within St Neots where the River Great Ouse runs through the centre of the town and is therefore more vulnerable to flooding. This is particularly important to make any development resilient in terms of flooding and climate change and the impact on surface water flooding events arising from increased impermeable surfaces further upstream.

Criterion iv of policy HOU19 does require the '*integration of Sustainable Drainage Systems into the network of open spaces, to mitigate potential flood risk, and measures to ensure resilience to climate change...*' and a '*site specific flood risk assessment including identifying opportunities to reduce surface water run-off and flood risk on and off site;*' to support the SPD and future planning applications. This is welcomed and HDC acknowledge that issues such as detailed design, drainage, landscaping and climate resilience measures will be identified during the production of the SPD and strategic masterplan, however, the off site element should stipulate that the assessment should also assess the impact of the development in St Neots and include climate change allowances and any mitigation measures required.

#### Suggested change

On page 74 amend the tenth bullet point of policy HOU19 so that it requires the site specific flood risk assessment also include assessment of the flooding impact of the development in St Neots and include climate change allowances and any mitigation measures required.

### c. Impact on local community facilities and infrastructure

HDC have particular concerns regarding the potential pressure that development at Little Barford could have on community facilities and infrastructure within St Neots. St Neots is experiencing growth with the strategic urban extension of Wintringham Park under construction, therefore other strategic developments within the vicinity may exacerbate any capacity issues within Huntingdonshire and undermine the sustainable development and infrastructure provision of already permitted sites.

HDC supports the proposed approach within proposed policy HOU19 that the SPD will be accompanied by an infrastructure delivery plan and phasing strategy so that infrastructure can be provided with or ahead of the development it supports. These must however be feasible and realistic produced in agreement with developers and infrastructure providers and consultation with Huntingdonshire District Council to provide additional certainty and clarity on how development at Little Barford will support itself and minimise pressure on St Neots services and facilities.

Additional clarity should be provided within criterion xi of policy HOU19 regarding how school capacity will be delivered and open prior to the first occupation – is it a financial contribution to an existing school to fund additional student capacity (if so which schools) or is it a new school open on the development site? If it is the former, certainties should be provided that do not compromise the delivery of new build schools as developers cannot pay twice for contributions. This would provide certainty to developers and to HDC and Cambridgeshire County Council on whether additional capacity will be sought within St Neots schools or not. Similar clarity should also be provided to criterion xiv regarding health facilities to limit the pressure that could be experienced on health facilities within St Neots.

The SA appraised various growth options on the proposed site. Pages 107 to 111 of the [Sustainability Report Appendices \(Appendix 7\)](#) assesses three options for the amount of growth at Little Barford. HDC note that while some of the commentary varies for each assessment against the SA objectives, the scoring, both in terms of their effect and longevity, are the same for each of the three options. HDC consider that additional commentary to distinguish between options would be helpful to further justify the proposed allocation at Little Barford at the scale identified within policy HOU19.

Furthermore, the assessment for SA objective no.13 *'provide for residents' needs and improve access to community services and facilities'* could also have highlighted the additional sustainability benefits of the higher growth option in providing increased viability to fund a secondary school. This would provide additional support for criterion xi of policy HOU19. It is however unclear from the [Bedford Local Plan 2040: Borough-Wide Viability Study \(April 2022\)](#), whether the provision of all of the schools required within criterion xi have been factored into the viability of the proposed allocation. The SA appraisal should have highlighted that there may be pressure points within St Neots where provision may not be immediately met by the development, for example in the early phases of the site's development when community services and facilities such as schools and health services are still being established and expanded. This is likely to be worse with the higher growth option and therefore additional mitigation is required.

#### Suggested change

Additional clarity should be provided within criterion xi of policy HOU19 regarding how school capacity will be delivered and open prior to the first occupation.

Additional text within criterion xiv identifying when first the first healthcare facilities may be provided in relation to first occupations.

#### **d. Impact on transport and travel**

Development at Little Barford is likely to increase pressure on the road network particularly along Barford Road and the roundabout between it and the A428. The potential delays in journey times arising from increased vehicle movements along the A428 and Barford Road and consequent delays and congestion within St Neots would detrimentally affect residents of St Neots. The impact this would have on air pollution and air quality is particularly important as central St Neots contains an Air Quality Management Area. Huntingdonshire District Council is concerned that this could exceed acceptable thresholds of air pollutants and harm the health of Huntingdonshire residents, this would also be contrary to national policy on air quality and climate change. There are also concerns about any linkages and impact on local roads Potton Road and Dewells Lane.

HDC note that on page 18 of the [Bedford Infrastructure Delivery Plan: The Need for a Stepped Trajectory – Transport Final Report \(May 2022\)](#) it is shown that the delivery of the Little Barford site is dependent on major transport work including an East-West Rail connection, widening of the A421, A428 improvements and Little Barford mitigation (bus service between St Neots and Sandy via development). Additionally, the SA assessment recognises that the self-containment of the proposed Little Barford new settlement will in the longer term minimise the need to travel and if travel is required then it be undertaken via sustainable modes.

In principle Huntingdonshire District Council are supportive of greater integration between areas via safe and sustainable modes of transport particularly where air pollution will be minimised. However, the timing of when travel links are delivered will impact how effectively movement by private vehicles will be minimised. Also, the timing of onsite infrastructure within the new development is critical so that residents do not need to make these journeys in the first place even if by sustainable or active modes of transport and minimise pressure points within St Neots. Not providing these early on within the proposed development may lead to increase car journeys and consequently increased congestion and air pollution.

The SPD requires that a transport and movement strategy be prepared which needs to include infrastructure needs and the relationship to East-West Rail. Taking the point within the preceding paragraph, this should be expanded so that the infrastructure needs and relationship with St Neots is also included within the transport and movement strategy. This would more effectively and holistically look at the transport provision, accessibility and connectivity of the whole site to surrounding areas rather than a reliance on assessing the relationship with an East-West Rail connection and thus provide a clearer link to delivering criteria xxviii to xx of policy HOU19.

#### Suggested change

On page 74 amend the third bullet point of policy HOU19 so that the transport and movement strategy is expanded to include the infrastructure needs and relationship with surrounding areas (including St Neots) in delivering transport improvements and increased connectivity and accessibility to surrounding areas.

#### **7) Nutrient neutrality**

On page 74 of the submission Local Plan to 2040, the proposed policy HOU19 identifies that a future planning application will need to demonstrate how the new settlement will provide a '*Natural Capital impact assessment and biodiversity study with appropriate mitigation and enhancements*'.

The wording here should also stipulate that the impact on nutrient levels within Portholme SAC should be assessed so that development can be shaped appropriately, and monitoring can be undertaken.

Moreover, the [Habitats Regulations Assessment \(HRA\) \(April 2022\)](#) that accompanies the submission Local Plan identifies that within 15km downstream of the proposed new settlement is Portholme SAC which the River Great Ouse feeds into. Paragraph 4.18 of the HRA states that as of March 2022, Portholme SAC was not on Natural England's list of European sites whose interest features are considered to be threatened/failing due to high nutrient levels. While this is currently the case, the impact of large scale development in such a location in combination with other developments along the River Great Ouse could lead to poor nutrient quality further downstream which may over time build up leading to poor nutrient quality further upstream.

Suggested change

On page 74 amend the first bullet point of policy HOU19 so that the Natural Capital impact assessment specifies that the impact on nutrient levels within Portholme SAC should be assessed so that development can be shaped appropriately, and monitoring can be undertaken.