



Bedford Borough Council
Local Plan 2040

Regulation 19 Representations

July 2022



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01260 288888

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1 INTRODUCTION

1.1 Context

1.1.1 Gladman welcome the publication of the Council's Pre-Submission Draft Local Plan under Regulation 19 inviting representations on the proposed submission documents from the 15th June to the 29th July 2022.

1.1.2 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public.

1.1.3 This submission provides Gladman's formal representations to the Regulation 19 Consultation.

1.1.4 This representation builds upon our comments made at previous stages of the plan making process as follows:

- Issues and Options Consultation 2020
- Call for sites 2020
- Draft Plan Consultation 2021

1.1.5 Gladman are promoting land in the Borough, these land interests include:

- Land east of Hookhams Lane, Salph End, Renhold (602)
- Land on the north west of Hall End Road, Wootton (603)
- Land off Bedford Road, Willington (566)

1.2 Plan Making and Structure of Representations

1.2.1 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. For a Local Plan to be sound it must be:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements

including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

1.2.2 This representation is set out to consider these areas. Comments are provided to reflect matters discussed in the Draft Plan, considering:

- Legal Compliance
- National Planning Policy Framework
- Locational Strategy for New Development
- Housing Need and Requirement
- Timing of Housing Delivery
- Development Management Policies
- Site Submission by Gladman
- Conclusions

1.3 Summary of Representation

1.3.1 For reasons that we explain in subsequent Sections of these Representations, **the Pre-Submission Draft Local Plan is not sound as currently prepared**. Gladman consider that the required work to ensure the Plan can be found sound extends well beyond detailed amendments to drafted policy wording. A fundamental review of the Plan and the basis upon which it has been prepared is required.

1.3.2 The following table provides a summary of the representations being made by Gladman at the Regulation 19 stage of the plan making process. Gladman formally request that we are afforded the opportunity to discuss the issues raised at the Local Plan examination public hearing sessions.

Policy / Issue	Sound/Unsound	Test of Soundness	Reason	Evidence
Sustainability Appraisal	N/A	N/A	Insufficient testing around village growth options. Alternative scales of growth have not been tested through the SA process. Insufficient justification for reasonable alternatives being rejected	
Spatial Strategy DS2	Unsound	Positively Prepared Justified Effective Consistent with National Policy	The spatial strategy should contain a mix of housing sites by size and scale across a broad area to ensure timely housing delivery	NPPF. PPG.
Amount and Timing of Housing Growth DS3	Unsound	Justified Effective	A stepped trajectory is inappropriate due to affordability issues that will be compounded by deferring the issue of addressing housing needs	NPPF, PPG
Distribution of Growth DS5	Unsound	Positively Prepared Justified Effective	A greater level of housing needs to be allocated to ensure that the minimum housing needs will be met	NPPF, PPG
Affordable Housing DM1	Comment			
Self-build and Custom Housebuilding DM5	Comment			
Space Standards DM6	Unsound	Justified	DM6 should be justified by meeting the criteria set out in the national policy, including need, viability, and impact on affordability. The Council require a robust local assessment evidencing its case, both in terms of need and viability, to support the proposed policy requirements.	NPPF.

2 LEGAL COMPLIANCE

2.1 Duty to Cooperate

- 2.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.
- 2.1.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Bedford Borough Council must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.
- 2.1.3 The NPPF sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground throughout the plan making process¹. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.
- 2.1.4 The PPG is also clear that local authorities should have made a SoCG available on their website by the time they publish their draft plan, in order to provide

¹ NPPF Paragraphs 25-27

communities and other stakeholders with a transparent picture of how they have collaborated². The Bedford Local Plan pre-submission consultation is not accompanied by a SoCG nor a Duty to Co-operate Statement. Instead, a series of position statements accompany the document as neighbouring authorities were not aware of the contents of the pre-submission Local Plan ahead of its formal publication. As such at this stage, it is not possible to ascertain duty to cooperate partners views of the Local Plan and where areas of agreement or disagreement may arise. Following publication of either a signed SoCG and / or Duty to Co-operate Statement, Gladman reserve the right to submit further comments on the Council's compliance with the Duty to Co-operate either in written Examination Hearing Statements or orally during Examination Hearing Sessions.

2.2 Sustainability Appraisal

- 2.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 2.2.2 A critical stage of the SA process is the consideration of alternative approaches and options for delivering the objectives of the Plan. These are often topics such as housing growth and distribution, employment land delivery and site-specific options. To assess reasonable alternatives, different options for delivering the Local Plan should be developed and assessed at a strategic level against the SA objectives and baseline conditions.
- 2.2.3 A series of options for the spatial strategy are tested through the SA with option 2Bi ultimately being preferred. This option comprises of growth within the urban area, growth adjacent to the urban area, growth within the transport corridor, land within the parishes within the transport corridor and a new settlement.

² PPG ID: 61-020-20190315

- 2.2.4 Of the other options tested, Option 8 is the most similar with the key difference between the two being a choice between a new settlement or village based growth. Determining that a new settlement is preferable to village based growth is the driver for proposing a stepped trajectory. None of the options readily combine the options of a new settlement **and** village based growth and this is considered to be a failing of the assessment.
- 2.2.5 There are always numerous options that can be assessed but it is alarming that various scales of growth to the villages have not been considered. In each of the options that include village based growth the minimum quantum of development is 4,000 dwellings. Gladman query why less development to the villages alongside the new settlement option has not been considered. Especially as all or nothing to the villages as an option is always likely to be appear more negatively in a rounded assessment.
- 2.2.6 The chosen preferred development strategy is then repeated throughout the assessment of reasonable alternatives with sites described as 'not consistent with the Councils preferred strategy'. This is even where sites comprise part of the preferred strategy but have not been allocated. This is considered another failing of the SA that should be addressed. This suggests that the sites that would comprise some of the options were pre-determined.
- 2.2.7 This certainly seems to be the case for the sites adjoining the urban area. The SA states at paragraph 9.9:
- The Council has decided that sites adjoining the edge of the urban area in most instances should not be part of the local plan strategy because, in many locations, the gap between the edge of the town and villages surrounding it is very narrow and the strategic expansion of the urban area in recent years has already reduced that separation. The Council's strategy is not to infill those gaps but to support only two sites adjacent to the urban area, where there are clear benefits associated with delivering the Council's strategic green infrastructure priorities.*
- 2.2.8 All other sites adjoining the urban area have been ruled out in favour of the two strategic scales, even where they would not cause coalescence and provide green

infrastructure benefits such as land Gladman are promoting within 0.5km of the urban area.

- 2.2.9 Finally, there appear to be a number of errors in the overall assessment of Option 8 and inconsistencies between the assessment of Option 2bi which will be discussed below. Amendments to the scoring of Option 8 may change where it features within the Council's preference and at the very least shows the importance of testing an option of village based growth but at a reduced scale.
- 2.2.10 Option 8 is marked down for potentially resulting in more trips by the private car to Bedford urban area, most of the villages already have a level of service and facility provision allowing this to be minimised in the first instance whereas a new settlement option is just as likely to increase trips to the Bedford urban area.
- 2.2.11 Growth in the villages is considered to affect the vitality and viability of the urban area, this is again just as likely through the new settlement option. Increased service provision within existing communities provides competition for the urban area whilst also allowing a potential reduction in trips to the urban area.
- 2.2.12 A reduction in carbon emissions is scored negatively in the village option due to an expected increase of the private car and commercial vehicles. This does not take account of mitigation measures such as the implementation of car clubs or mobility hubs associated with growth in the villages that would not only benefit new residents but also existing communities. Whilst an increase of the private car would also be expected with the new village option, this does not provide the opportunity to provide potential mitigation measures for existing communities like growth in the villages does.
- 2.2.13 This is just a few of the instances where the assessment of these options should be revisited. As such, Gladman remind the Council that there have now been several instances where the failure to undertake a satisfactory SA has resulted in Plans failing the test of legal compliance at Examination or being subjected to legal challenge. We reserve the right to submit further comments on the Sustainability Appraisal either in written Examination Hearing Statements or orally during Examination Hearing Sessions.

3 NATIONAL PLANNING GUIDANCE

3.1 National Planning Policy Framework

3.1.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced.

3.1.2 The NPPF requires that plans set out a vision and a framework for future development and seek to address the strategic priorities for the area. Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'.

3.1.3 The NPPF reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for, to address housing, economic, social and environmental priorities and to help shape the development of local communities for future generations.

3.1.4 In particular, paragraph 16 of the NPPF states that Plans should:

"a) Be prepared with the objective of contributing to the achievement of sustainable development;

b) Be prepared positively, in a way that is aspirational but deliverable;

c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."

- 3.1.5 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Bedford Local Plan 2040 provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs. In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs (LHN) assessment defined using the standard method. LHN sets the **minimum** number of homes required and this is the starting point for determining the number of homes required in any local planning authority area, unless there are circumstances to justify an alternative approach.
- 3.1.6 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 68 sets out specific guidance that local planning authorities should consider when identifying and meeting their housing needs, with Annex 2 of the NPPF providing definitions for the terms "deliverable" and "developable".
- 3.1.7 Once a local planning authority has identified its LHN, these needs should be met as a minimum, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so, or the application of certain policies in the Framework would provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), local authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see paragraph 35).
- 3.1.8 The July 2021 revision to the NPPF provides greater focus on the environment, design quality and place-making alongside providing additional guidance in relation to flooding setting out a Flood Risk Vulnerability Classification at Annex 3, the importance of Tree-lined streets and amendments to Article 4 directions. Moreover, Local Plans which had not yet progressed to Regulation 19 stage should ensure that where strategic developments such as new settlements or significant extensions are required, they are set within a vision that looks ahead at least 30 years. The Regulation 19 Bedford Local Plan 2040 has no such vision for a 30-year period.

3.2 Planning Practice Guidance

3.2.1 The Planning Practice Guidance (PPG) was first published by the Government to provide clarity on how specific elements of the NPPF should be interpreted. The PPG has been updated to reflect the changes introduced by the revised NPPF to national planning policy. The most significant changes to the PPG relate to defining housing need, housing supply and housing delivery performance.

4 POLICIES OF THE BEDFORD LOCAL PLAN 2040

4.1 Context

4.1.1 The Bedford Local Plan 2030 was adopted in January 2020. Bedford Borough Council is in the process of reviewing the Bedford Local Plan 2030. This Local Plan was subject to an early review. The terms of this review policy state:

'The plan review will secure levels of growth that accord with government policy and any growth deals that have been agreed. The planning and delivery of strategic growth will be aligned with the delivery of planned infrastructure schemes including the A421 expressway, Black Cat junction, East West Rail link and potentially the A1 realignment.'

4.2 Vision and Objectives

4.2.1 The NPPF is clear that where development plans are proposing large scale developments such as those within the Bedford Local Plan 2040, policies should be set within a vision that looks further ahead, at least 30 years, to take account the likely timescale for delivery. The vision should therefore be amended and updated to reflect this requirement of national policy.

4.3 Climate Change

Policy DS1(S) Resources and climate change

4.3.1 It is acknowledged that the planning system has an important role to play in tackling the effects of climate change. In this respect, the overarching environmental objective of sustainable development cited in paragraph 8 of the National Planning Policy Framework highlights how the planning system should help to mitigate and adapt to climate change, and support the transition to a low carbon economy.

4.3.2 This objective filters through to other elements of the Framework, including Section 14 that deals specifically with Meeting the Challenge of Climate Change. In this regard, paragraph 152 of the Framework identifies how the planning system should:

"support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise

vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure”

4.3.3 Gladman therefore recognise the increasing importance of tackling climate change and encourage sustainable housing developments to mitigate its impact. The Council should continue to take account of climate change in its plan-making, including any updates to guidance in relation to the Framework and PPG. It is important to recognise that mitigating and adapting to climate change must also be compatible with other important objectives for the planning system, including the requirement to boost housing delivery and build a strong, competitive economy.

4.3.4 Bedford Borough Council have declared a climate emergency and Gladman is committed to contributing towards providing solutions to address these concerns. Gladman takes climate change seriously and our sites across Bedford can deliver numerous environmental commitments to assist the Council in meeting its climate related strategies:

Provision of Public Open Space

4.3.5 Well-designed open space will support an active lifestyle, by encouraging people to walk and cycle. It can also assist in terms of climate change resilience, through the provision of tree planting providing shading and CO2 absorption.

Sustainable Transport Methods

4.3.6 Our sites will deliver a comprehensive package of pedestrian and cycle infrastructure which will promote sustainable transport, including a suite of practical measures aimed at reducing traffic impact. All our sites could potentially deliver new bus stops and electric vehicle charging points, subject to further discussion with the Council and relevant stakeholders.

Renewable Energy & Energy Performance

- 4.3.7 Renewable energy technologies will be considered at the detailed design stage. These proposals will follow energy performance and efficiency targets, using a fabric-first approach to construction with the aim of reducing CO2 emissions.

Construction Management Plan

- 4.3.8 A construction management plan will be submitted at the reserved matters stage, which will put in place best practice measures such as re-using topsoil where possible, modern methods of construction and keeping landfill waste to a minimum.

4.4 Spatial Strategy and Site Allocations

Policy DS2(S) Spatial Strategy

- 4.4.1 Gladman are seeking changes to the spatial strategy of the Local Plan. More small and medium sites should be allocated to ensure that housing delivery can be increased in the short term to a level required by the standard methodology.
- 4.4.2 The spatial strategy can be summarised as growth opportunities within the Bedford urban area, strategic expansion of the urban area and strategic sites in transport growth corridors. Even growth to the villages is of a strategic scale. The nature of the sites proposed mean that housing delivery will not increase in the short term. Sites in the urban area may not be immediately available and the strategic sites are reliant on proposed strategic infrastructure.
- 4.4.3 We have submitted detailed commentary around the SA and the testing of options including village growth and we feel that any spatial strategy that overlooks the pivotal role growth in the villages can play in the timely delivery of housing is unsound.
- 4.4.4 The Council has deliberately sought to avoid allocating growth to settlements that were required to take growth in the adopted local plan, yet this plan only covers the period to 2030. There would be a ten-year period where these settlements are receiving no additional housing growth, set against a backdrop of the acute affordability issues across Bedford this is only likely to increase unaffordability in the

villages. There will be a housing need in the villages beyond 2030 but this not currently addressed in the pre-submission draft.

4.4.5 Another opportunity to increase housing delivery in the shorter term is a reconsideration of sites adjoining/adjacent to the urban area. However, the Council have opted to include only two strategic scale sites, adjacent to urban areas, on the basis of a green and blue infrastructure led approach. Concerns around potential coalescence are noted, but there are sites available to the Council in close proximity to the existing urban area that can contribute to the provision of green infrastructure whilst also delivering housing in the short term.

4.4.6 The inclusion of two new garden settlements to deliver a significant proportion of development in the latter stages of the plan period is a concern from a deliverability perspective. New settlements can play an important role in the delivery of new housing to meet the needs of a district, whilst avoiding some of the major constraints that may limit development elsewhere. However, the lead-in time and delivery of such schemes must be realistic and it is unlikely that these will start to deliver units in the first five years of the Plan. Therefore, any new settlements must be complemented by a range of additional smaller scale sites in both urban and rural locations that will deliver units in the early part of the plan period and provide flexibility if the larger sites do not deliver as quick as anticipated. If large scale housing targets are to be met a range of sites of differing scales and locations is vital.

Policy DS3(S) Amount and Timing of Housing Growth

4.4.7 The Local Plan is proposing to set a housing requirement of 27,100 between 2020 and 2040. This equates to an annual housing target of 1,355 using the standard methodology for calculating housing needs.

4.4.8 PPG clearly states that the standard methodology is merely the starting point for calculating housing need and only provides the minimum number of homes needed to meet the demographic baseline of housing needs. It is important that the housing needs of Bedford are not under-estimated.

- 4.4.9 Further consideration of the local circumstances of the area and the aspirations the Council wishes to achieve should be considered in determining the number of homes needed. This can include resolving historic housing under delivery, increasing economic output of the area, boosting affordable housing supply and the delivery of key infrastructure projects. Consideration should also be given as to whether the local authority is able to assist neighbouring authorities with their unmet housing needs. All of these factors should ultimately inform the final housing requirement for the Plan.
- 4.4.10 In the context of Bedford, the aspirations and implications of the Oxford-Cambridge Arc should not be under-estimated. Sitting centrally within the arc the potential economic boost of two planned new stations along the East West Rail (EWR) could have significant implications for economic growth and housing need. It is important that employment growth and housing growth are aligned so as to ensure unsustainable commuting patterns are not formed. However, it must also be noted that at the time of writing there are emerging doubts about the EWR proposals through the borough.

Stepped Trajectory

- 4.4.11 The Council are proposing to use a stepped trajectory for the delivery of housing. Continuing the housing target (970) of the Local Plan 2030 for the first five period, a minimal increase to 1,050 for the second five year period and a significant increase from 2030 onwards to 1,700 dwellings per annum when the strategic infrastructure, that a number of allocations are reliant on, is scheduled to be completed. Doubts have recently emerged around the Government's commitment to this infrastructure and this could have serious implications for the plan as a whole.
- 4.4.12 Gladman strongly object to this approach. Whilst we recognise that the increase from the adopted housing target to the use of the standard methodology is a large increase, this is mainly due to the affordability adjustment of the calculation due to the inherent unaffordability of the borough. Seeking to defer meeting the needs established using the standard methodology is only likely to compound affordability

issues and does not represent a positively prepared local plan. More should be done to address this increase in the short term.

- 4.4.13 The apparent need for the stepped trajectory is a due to a deliberate choice from the Council to favour a strategy of two Garden Settlements, expected to deliver in the later stages of the plan period. Whilst these Garden Settlements are linked to large scale strategic infrastructure projects the rate of delivery expected on these sites is very ambitious in the latter part of the plan period and there is scope for this to roll on beyond the plan period.
- 4.4.14 Delivery rates reaching up to 600 dwellings on a single development for, a number of years is highly unlikely to be achievable, the Local Plan trajectory proposes this across two sites at the same time. Evidence from Lichfield's second edition of the Start to Finish report³ on build out rates indicates that the average build out rate for sites larger than 2,000 dwellings is 181 dwellings per annum on average across the whole life of the development. Whilst recognising that build out rates can vary due to a number of conditions, 7 continuous years of delivery in excess of these figures and in 4 of years over double this rate is unprecedented.
- 4.4.15
- 4.4.16 Most of the housing delivery is proposed on these two sites in the latter stages of the plan period and by this stage it will be Impossible to address the failures of the strategy. Using a more realistic expectation around delivery rates on these sites would mean that the Council will not meet the minimum housing requirement. A significant failing of the proposed strategy.
- 4.4.17 This would also be likely to adversely affect the vitality and viability of services in existing settlements and result in a lack of housing choice in the market. It would also be difficult to accommodate changes in demand for certain types of development/services required over the very long period being committed to within the current strategy.

³ https://lichfields.uk/media/5779/start-to-finish_what-factors-affect-the-build-out-rates-of-large-scale-housing-sites.pdf

Policy DS4(S) Amount of Employment Growth

- 4.4.18 The level of growth should be based upon a robust assessment of anticipated job growth, especially in light of the Council's role within the Oxford Cambridge arc. This should also be considered in the context of housing needs.
- 4.4.19 The level of job growth is broadly the same as the housing requirement suggesting 1 new job per 1 new dwelling. The relationship between new homes and jobs should be carefully considered.

Policy DS5(S) Distribution of Growth

- 4.4.20 This policy sets out the components of the spatial strategy. The Local Plan 2040 makes allocations for up to 13,550 new homes within the plan period, with 400 homes expected beyond the plan period.
- 4.4.21 Gladman has already submitted detailed commentary on the spatial strategy to policy DS2 and the SA and so will not rehearse these points again here.
- 4.4.22 The 13,550 new homes combined with commitments, windfall allowance and completions of 14,824 dwellings this is a total of 27,834 against the requirement of 27,100. This only represents a flexibility factor of 2.7% above the minimum housing requirement, or just over one year's delivery at either Garden Settlement.
- 4.4.23 To safeguard any slippage in the anticipated trajectory of these large strategic sites the over-provision in the plan period should be increased. There is no hard and fast rule for what this over-provision should be but, Gladman supports the Home Builders Federation's recommendation that local plans should seek to identify sufficient deliverable sites to provide a 20% buffer between the housing requirement and supply.
- 4.4.24 Without identifying further small and medium sites to deliver in the early part of the plan period there is a real risk that the minimum housing requirement of the Local Plan will not be met.
- 4.4.25 The Councils Local Plan strategy as currently set out has insufficient flexibility to be considered sound. A minor change to the delivery timescales of one of the new

settlements would see the whole plan (already significantly backloaded in terms of delivery) fail to achieve its targets.

4.5 Development Management Policies

Policy DM1(S) Affordable Housing

4.5.1 Policy DM1(S) sets out that at least 30% affordable housing is to be delivered where residential development proposals consist of 10 dwellings or more. The policy goes on to state that 25% of the total affordable housing requirement will need to be provided as First Homes.

4.5.2 At least 10% of total homes on developments sites should be available for affordable home ownership in accordance with Paragraph 65 of the Framework. This 10% requirement was first introduced in the 2018 Framework and included property tenure types such as Intermediate Shared Ownership.

4.5.3 Gladman can confirm that our site interests can accommodate this emerging policy requirement.

Policy DM5 Self-build and Custom Housebuilding

4.5.4 Policy DM5 requires all sites of 5 or more dwellings to include provision of plots for self-build and custom housing as part of an appropriate mix of housing.

4.5.5 Gladman broadly support the inclusion of a policy in respect of self-build and custom-build housing in line with current government thinking and objectives. We consider it essential, however, that the policy wording rather than the supporting text should state that once a self-build and/or custom-build plot has been marketed for 12 months but failed to sell, it will revert to consideration by the Council to be built out as conventional market housing.

Policy DM6 Residential Space Standards

4.5.6 Policy DM6 seeks compliance with the Nationally Described Space Standards (NDSS), or any replacement standards produced by the Government, for all new homes including from change of use and conversion.

4.5.7 If the Council wishes to apply the optional NDSS to all dwellings, then this should only be done in accordance with paragraph 130f and footnote 49 of the NPPF. Footnote 49 confirms:

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

4.5.8 Furthermore, with reference to the NDSS, the PPG confirms:

"Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies".

4.5.9 If the Council wishes to adopt this optional standard, it should be justified by meeting the criteria set out in the national policy, including need, viability and impact on affordability.

5 SITE SUBMISSIONS BY GLADMAN

5.1 Details of Site Submissions

5.1.1 In pursuing a stepped trajectory, it is clear that delivery of housing will be stifled in the short term. This approach is not considered to be appropriate as has been discussed earlier.

5.1.2 Instead, it is essential to allocate further housing sites to improve housing delivery in the short-term negating the need to use a stepped trajectory. The following section provides an overview of the sites promoted by Gladman in the Borough that have not been identified for residential allocation.

5.1.3 An ArcGIS StoryMap link can be found in Appendix 1, giving further details of sites listed below. This is an interactive software that the Council can use to explore the information provided and use analysis tools. These sites include:

- Land east of Hookhams Lane, Salph End, Renhold (602)
- Land on the north west of Hall End Road, Wootton (603)
- Land off Bedford Road, Willington (566)

5.1.4 All of the above sites are sustainable and deliverable in their own right. Significant technical work has been undertaken on all sites to demonstrate that they can deliver new homes effectively across the plan period. Moreover, several of the sites can be brought forward for development immediately, such that they can make a significant contribution to the Council's five-year housing land supply.

5.2 Site Submission Conclusions

5.2.1 We encourage the Council to identify additional sites to ensure the Council's housing requirements are met and we respectfully request that these sites are assessed fully in the Local Plan process which will identify that they are all appropriate for allocation.

6 SUMMARY AND CONCLUSIONS

6.1 Introduction

6.1.1 Gladman welcomes the opportunity to comment on the Bedford Borough Local Plan 2040 Regulation 19 consultation. These representations have been drafted with reference to the revised National Planning Policy Framework (2021) and Planning Practice Guidance.

6.1.2 As currently framed, we consider that in relation to the proposed timing of residential development and its proposed distribution, the Plan fails the test of soundness as it is not positively prepared, not adequately justified based on the evidence, not effective and inconsistent with national policy.

6.2 Assessment against the tests of soundness

6.2.1 In accordance with the tests of soundness in national policy, Gladman's concerns are summarised as follows:

- The proposed timing of development will not meet identified needs in the short term.
- The timescales are also insufficiently ambitious and fail to support sustainable economic growth in the Borough in the short term.
- The provision for a c. 2.7% flexibility allowance is clearly inadequate given the reliance upon large sites, to deliver a significant proportion of the housing supply.
- The approach to site selection is flawed as it appears to be based upon a predetermined strategy, evident from the assessment of reasonable alternatives and fails to take proper account of the available evidence and does not fully assess alternative locations for sustainable growth.
- Several issues relating to a number of proposed development management policies.

6.2.2 Gladman consider that significant modifications will be required to the Plan so that it can be found sound.

6.2.3 At this time, it is not possible to tell that the Council has discharged its Duty to Cooperate, and this could have fatal implications for the Plan at examination.

6.3 Conclusions

6.3.1 The plan is likely to fail without sufficient flexibility and additional site allocations given its reliance on the timely delivery of strategic infrastructure to enable the delivery of proposed strategic sites.

6.3.2 Due to the issues raised through this submission, Gladman formally request to participate at the examination in public to discuss the issues raised.

Appendix 1 – Gladman Site Submission

Gladman sites can be found using the following ArcGIS StoryMap link:

<https://storymaps.arcgis.com/stories/dea77c18dae546528591bce47896c10f>

