



For and on behalf of
Old Road Securities Ltd

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

**Land at Willoughby Park, Great Barford
LPA Site ID: Ref – 604 & 645**

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

- 1.1 This representation has been prepared by **DLP Planning Ltd (DLP)** on behalf of **Old Road Securities Ltd** in response to the 'Bedford Local Plan 2040 – Draft Plan Strategy Options and Draft Policies (Regulation 18) Consultation'
- 1.2 This representation relates to our client's site at land off Roxton Road, Great Barford. Our client's interests were submitted to Bedford Borough Council as part of the Call for Sites exercise undertaken to inform the preparation of the emerging Local Plan 2030. Two call for sites submitted by DLP exist for our client's site and are recorded under LPA ID 604 ('Land off Roxton Road') and 645 ('Willoughby Park') respectively. Respective site location plans can be found at Appendix 1 and 2.
- 1.3 DLP, on behalf of Old Road Securities Ltd, welcomes the Council's decision to review and update the various elements of the extant development plan and provide for a new local plan document that will fully reflect the policies of the National Planning Policy Framework (the Framework) and provide for the up-to-date development needs of the borough and its residents in a sustainable manner.
- 1.4 DLP wishes to make a number of comments on the consultation document as part of the background context to the representations we are submitting on the site itself.
- 1.5 This Report addresses the Council's consultation proposals and identifies in-principle support for those elements of Council's Preferred Strategy Options that indicate growth in the 'east' transport corridor parishes, specifically at Great Barford. Reservations are, however, expressed in the context that the inclusion (and resultant levels of development) of the 'east' corridor parishes is unconfirmed and contingent upon only **Option 2d** being selected.
- 1.6 The other main components of the Council's Preferred Options, if pursued and associated with the levels of development as set out, will not provide the basis for a sound or legally compliant strategy without support from growth within the 'east' corridor parishes and more widely recognising the benefits of village-related growth as part of a 'hybrid' strategy.
- 1.7 Modifications are suggested to enable preparation of a version of the draft Local Plan 2040 that addresses the issues identified, ahead of further consultation and subsequent

Submission and Examination.

1.8 This Report, which should be read alongside any supporting documents and appendices referred to, addresses our instructions to cover the following topics:

- **Section 2** provides a background to the Local Plan Review and its relationship to national policy and other material considerations
- **Section 3** provides representations on the overarching Vision, Objectives and Scope of the Local Plan 2040
- **Section 4** provides general comments on soundness risks with the Strategy Options subject to consultation
- **Section 5** deals with our client's in-principle support for those components of the Preferred Options that include growth within the 'east' transport corridor parishes and principally Great Barford (**Option 2d**) and assesses this in the context of proposals for an appropriate strategy.
- **Section 6** summarises why the Council's proposed 'stepped approach' is incapable of satisfying national policy and guidance, having regard to local evidence of supply
- **Section 7** comprises our review of the Council's draft Site Assessment Proforma and a summary of our client's interests that support their selection for allocation as part of the strategy

2.0 BACKGROUND TO THE LOCAL PLAN REVIEW AND ITS RELATIONSHIP WITH NATIONAL POLICY AND OTHER MATERIAL CONSIDERATIONS

Summary of Local Plan 2030 and Requirement for Immediate Review

2.1 The Bedford Local 2030 was adopted subject to the provisions of Policy 1 – ‘Reviewing the Local Plan 2030’. The Inspectors’ Report provides further clarification of the requirement for Modifications introducing the approach to this Policy and that it was considered essential for soundness.

2.2 Paragraph 1.1 of the Council’s Preferred Options Consultation Document affirms the significance of the ‘guillotine’ mechanism inserted within the review policy, which engages paragraph 11(d) of the NPPF2021 in the event that a new Plan is not submitted for Examination before January 2023. While the Borough Council is aware it cannot avoid the consequences for the statutory development plan of failing to adhere to these timescales the Preferred Options published for consultation must also address the reasons for first introducing Policy 1. Drawing from the Inspectors’ Report:

- Paragraph 17 emphasises the importance of considering longer-term requirements and thus together with other issues with the Plan a **need** for the review to be undertaken **as quickly as possible** with the three-year timeframe providing balance to allow work to be completed effectively
- Paragraphs 33-34 anticipate that the review will consider the balance between jobs and workers including any changes in the balance of net out-commuting and the implications of the Oxford-Cambridge Arc
- Paragraph 40 confirms that the Local Plan 2030’s housing requirement was determined as 970 dwellings per annum as a result of transitional arrangements for the Examination of Plans under the 2012 version of the Framework.
- Paragraph 113 confirms an expectation of two reviews before 2030 to address potential issues of non-delivery, maintain a buffer in supply and to ensure that the allocation/supply of housing is sufficient to meet the identified need, which is, itself, likely to change over time (as calculated by the government’s standard method).
- Paragraph 123 recognises that the continued existence of a five year supply of deliverable sites (within the provisions of the Local Plan 2030) is dependent on the progress with constrained capacity in the urban area and bringing forward allocations within Neighbourhood Plans quickly. The scope for early review is to allow for potential issues of non-delivery to be addressed and to consider the requirement for any additional housing site allocations in the light of evidence on housing need and realistic supply at that time.

2.3 Paragraph 18 of the Inspectors’ Report confirms that Policy 1 cannot set the parameters of the updated Local Plan. While there is a desire for alignment with the delivery of cross-boundary strategic priorities (including those related to the delivery of the Oxford-Cambridge

Arc) the requirement for review is a result of the deficiencies with the approach put forward by the Council in the Local Plan 2030.

- 2.4 The appointed Inspectors determined (in the context of the 2012 Framework) it would not be effective for the policies of the Local Plan 2030 to look beyond that date. The findings of soundness are predicated on the context of a very narrow remit of addressing the area's strategic priorities (and even then, only with the application of the three-year 'guillotine' following adoption).
- 2.5 It is not open to future Inspectors to reach the same conclusion. This emphasises the importance of the of the first paragraph of Policy 1 and the overriding objective of the aim of the review to secure levels of growth that accord with government policy. This establishes grounds for a Plan that must be fundamentally deliverable / developable over than plan period and cannot further defer relevant decisions relating to options to meet the area's strategic priorities.
- 2.6 In not fully responding to the reasons and scope of requirements for the review and subsequent update of the Local Plan the Council risks rolling forward several of the same fundamental shortcomings in the Local Plan 2030. This is not only contrary to the objectives of sustainable development but in the context of the most recent policy and guidance simply fails to provide the basis for a sound Local Plan.

National Policy and Guidance

- 2.7 The most recent version of the National Planning Policy Framework was published in July 2021, following commencement of the Council's Preferred Options consultation. The changes were published in draft format in January 2021 (including those relevant to the plan-making framework) and thus available for the Council to consider.
- 2.8 These representations highlight four important components of the 2021 Framework and the changes they necessitate for the scope of the review, relative to the 2012 version of the Framework against which the current Local Plan 2030 was assessed. Other specific provisions of the Framework and NPPG are referred to in comments relating to detailed elements of the consultation proposal.
- 2.9 Firstly, Paragraph 22 of the NPPF2021 confirms that strategic policies should look ahead over a minimum 15-year period from adoption and anticipate long-term requirements. This is

a significant change from paragraph 157 of the 2012 Framework that specified that policies should be drawn up over an appropriate timeframe and only preferably a 15-year horizon.

- 2.10 Secondly, the second paragraph of NPPF2021 Paragraph 22 is a significant addition following the most recent revisions. This requires that policies should the address a vision that looks further ahead (at least 30 years) where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area. The transitional arrangements for these provisions at Annex 1 confirm their application to the preparation of all Plans except those that have already undergone consultation on the Submission version Plan. The Oxford-Cambridge Spatial Framework is also seeking to cover the period to 2050 (i.e., 30 years).
- 2.11 The Council's Preferred Options clearly anticipate reliance on these approaches to growth and the associated implications in terms of extended timescales for development. None of the Council's Preferred Options set out the proposed approach beyond a 20-year horizon. As a result, detailed policies for the scale and distribution of growth cannot be considered consistent with national policy without significantly extending their scope alongside provision for the other requirements of sustainable development.
- 2.12 Thirdly, the requirements of Policy 1 of the Local Plan 2030 accord with the circumstances outlined at Paragraph 33 of the NPPF2021 where a significant change in circumstances is identified as a result of the calculation of local housing need. Paragraph 61 of the NPPF2021 outlines that minimum annual local housing need should be calculated using the government's standard method. This is translated into the requirements against which plans must be assessed for soundness in terms of ensuring they are positively prepared and seek to meet needs in full (see NPPF2021 paragraph 35 and footnote 21) alongside the consideration of unmet needs from neighbouring areas. NPPF2021 paragraph 31 also emphasises the importance of considering relevant market signals.
- 2.13 The NPPG provides further clarification that the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Circumstances where it may be appropriate to plan for a higher housing need figure than the standard method indicates include any growth strategies for the area and strategic infrastructure improvements that are planned for (ID: 2a-010-20201216).

- 2.14 The Council accepts that there are no exceptional local circumstances that justify deviating from the standard method, but the Preferred Options do not assess any alternative approach identifying a higher need than calculated by the standard method (that will typically be considered sound) (ID: ID: 2a-015-20190220). The assessment of market signals should include expected changes in the labour market, engagement with stakeholders for economic development and changes that may affect the anticipated population and local housing stock (ID: 2a-027-20190220).
- 2.15 Finally, Paragraph 35 of the NPPF2021 confirms that the criteria for the assessment of soundness have changed since the 2012 Framework. In order to provide for a justified approach, the policies for the Plan must provide for ‘**an appropriate strategy**’ rather than the ‘most appropriate’ strategy when assessed against reasonable alternatives. Paragraph 32 of the NPPF2021 provides further detail on the basis for assessing the proposed strategy in terms of seeking net gains for sustainable development and ensuring that the Plan has addressed relevant economic, social, and environmental objectives.
- 2.16 In summary, there is no longer any support in national policy for the outcomes of the Local Plan 2030 Examination in terms of pursuing constraints to the plan period and overall level of growth and deferring decisions on key components of approaches to meet strategic priorities for the area (particularly in terms of overall housing need (including affordable housing) and the delivery of social and community infrastructure (including health and education)).

Other Material Considerations (Notably Ox-Cam Arc Spatial Framework)

Emerging Oxford Cambridge Arc Spatial Framework

- 2.17 The proposed Oxford-Cambridge Spatial Framework will have the status of national policy and is intended to form a material consideration for plan-making alongside the National Planning Policy Framework.
- 2.18 The government is currently seeking view on priorities for the Framework as part of consultation on the document ‘Creating a Vision for the Oxford-Cambridge Arc’ (until October 2021). The latest consultation proposals set out that it will aim to guide sustainable planning

and investment decisions under four policy pillars:

- the environment;
- the economy;
- connectivity and infrastructure; and
- place-making.

2.19 The current consultation follows publication of an initial policy paper in February 2021 setting out the approach to developing the Framework. Paragraphs 2.10 and 2.11 of the policy paper set out in terms of the strategy for housing and planning in the Arc the role of the Framework will not be to make site allocations or to include detailed policies set elsewhere in national policy or better left to local plans (including for example, setting out the housing requirement). However, the policy paper emphasises the importance of meeting housing needs in full (including the delivery of affordable housing) and therefore relies on the calculation of minimum annual local housing need in accordance with the standard method as its starting point. Opportunities to increase levels of development above this minimum starting point are clearly anticipated as part of the Framework's aspirations to support economic development and ensure a balance between the delivery of new jobs and homes (see paragraph 2.6).

2.20 Paragraph 3.8 of the policy paper sets out that the government expects:

“ local planning authorities to continue to develop local plans before the publication of the Spatial Framework. These changes will sit alongside wider planning reforms, and as we take forward our response to the ‘Planning for the Future’ consultation, we will outline transitional arrangements and the role of the Spatial Framework within any new system.”

2.21 The development of the Spatial Framework will be supported by two further public consultations: Towards a Spatial Framework (Spring 2022) and Draft Spatial Framework (Autumn 2022). It is the government's intention to commence implementation of the Spatial Framework throughout 2023, meaning its policies are expected to be in place as a material consideration at the same point the Bedford Local Plan 2040 is undergoing Examination.

3.0 REPRESENTATIONS – DRAFT PLAN SCOPE, VISION AND OBJECTIVES

Comments on the Proposed Approach and Supporting Evidence

- 3.1 The section of the representations provides observations on the soundness of the Council's overall approach towards preparation of the Local Plan 2040 and identification of the strategic priorities it is required to address. Comments specifically relate to Chapters 1 and 2 of the consultation document.

Paragraph 1.5 (proposed plan period)– Object

- 3.2 Definition of the proposed plan period underpinning the Council's Preferred Options has been rendered inconsistent with national policy following publication of the 2021 version of the NPPF.

Reasoning

- 3.3 The larger-scale approaches to development (including new settlements) that the Council has identified as part of its Preferred Options accord with the circumstances that national policy identifies for considering a minimum 30-year horizon, to take account of longer timescales for development.
- 3.4 Paragraph 1.2 of the 'Creating a Vision for the Ox-Cam Arc' consultation document also confirms that the Spatial Framework will extend to 2050 and beyond. Preparation of the Bedford Local Plan 2040 should be undertaken consistently with this aim.
- 3.5 The proposed plan period of 2020 to 2040, particularly when read in the context of the Council's Preferred Options resulting in a further delay to meeting development needs in full (until at least 2030) will generate a requirement for further, successive, reviews and is setting the plan up to fail.

Remedy

- 3.6 Bedford Borough Council should not wait for transitional arrangements upon introduction of the Framework to have to undertake yet another review that will need to consider the shortfall in meeting needs and addressing strategic priorities to 2030. Realistically, as a result of the scale and pattern of the Preferred Options proposed, delays to timescales for development are also likely to result in delays to meeting needs in full between 2030 and 2040.

- 3.7 Those parts of the Council's Preferred Options relying on larger-scale development should be profiled to look further ahead to 2050.
- 3.8 This reemphasises that in terms of the soundness requirements for preparation of the Local Plan 2040 the Council's proposed approach must also fully embrace those sustainable opportunities to meet the increased requirements for growth in the immediate term. This can be enabled through recognising the increased benefits of Preferred **Option 2d**. This enables the prioritisation of suitable and deliverable sites within the 'east' corridor parishes (including Great Barford) and more widely recognising village-related growth as part of a 'hybrid' strategy.

Paragraph 1.10 (alignment with the Spatial Framework) – Comment

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

Reasoning

- 3.10 It is surprising, and inconsistent with national policy and the emerging objectives of the Arc Spatial Framework, that the consultation proposals make no mention of the connectivity or place-making pillars of the Spatial Framework. Each should be considered of equal importance.
- 3.11 Specifically, paragraph 4.1 of the consultation document 'Creating a Vision for the Oxford-Cambridge Arc places significant emphasis on reducing the need to travel. Connectivity is not just about strategic road/rail links - it means:

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

- 3.12 Paragraph 4.4 also states the importance of recognising the needs of an ageing population

in terms of service delivery. At Paragraph 4.5 the document goes on to explain:

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

- 3.13 The settlement hierarchy in Bedford Borough means that Key Service Centres across the authority have a key role in delivering these requirements for sustainable communities and serving a wider rural hinterland – both in terms of immediate needs and their role throughout the plan period. The strategy in the Local Plan 2030 has deferred important decisions relating to these priorities in terms of placing the requirement to allocate sites upon Neighbourhood Plans. Priorities have therefore not been addressed and in any event the current strategy has only sought to address a foreshortened period to 2030.

Remedy

- 3.14 The Council's Preferred **Option 2d** delivers scope to fulfil local requirements for effective place-making and enhancements to connectivity through support for growth in the 'east' corridor parishes and specifically at Great Barford. It is necessary, however, to ensure that the approach to this component of the strategy is underpinned by the Council's site assessment and site selection process and that this seeks to specify levels of development that maximise opportunities for growth. This is particularly the case at Great Barford (the only Key Service Centre within the 'east' corridor) where the majority of development under this part of the strategy would be expected to take place.
- 3.15 The Council's indicative figure of 750 units in the 'east' corridor parishes in the strategy distribution options is not based on any site-specific testing. Firstly, this represents a risk to securing the opportunities and benefits from this part of the Plan Area as part of the approach, once finalised. Secondly, the current evidence base also takes no account of those opportunities that would embrace opportunities both in the period to 2030 (to address the immediate uplift in the need for growth) and across the entire plan period. Our client's Willoughby Park proposals comprising a self-contained scheme for 500 units accord closely with the Council's indicative figures for distribution and incorporate a positive response to the emerging Plan's place-making objectives (particularly in terms of provision for health and green infrastructure). It is therefore essential for soundness that our client's site is confirmed as part of the final selected strategy subject to future consultation in order to provide a significant local contribution towards the emerging priorities of the Spatial Framework.

***Paragraph 1.11 and Paragraphs 3.1 – 3.3 (Local Housing Need and Levels of Growth)–
Comment***

- 3.16 Paragraph 61 of the NPPF2021 confirms that minimum annual local housing need calculated in accordance with the government’s standard method provides the starting point for assessment of the number of homes to be provided through plan-making. Positive plan-making should address those circumstances where it may be appropriate to make provision for a higher number of new homes than indicated by the result of the standard method (with a non-exhaustive list of potential reasons summarised in the Planning Practice Guidance at ID: 2a-010-20201216).
- 3.17 It is apparent from paragraphs 1.11 and 3.1 to 3.3 of the Council’s consultation proposals that the Council has not considered potential reasons to plan for a higher housing number as part of the current process. Instead, it has only tested an arbitrary 10% uplift to the calculation of LHN within the draft Sustainability Appraisal process. This approach is contrary to material considerations (including the Council’s own evidence base) that require more detailed assessment before selecting options for the submission draft Plan and setting the housing requirement in the Plan.

Reasoning

- 3.18 Paragraph 3.4 of the consultation document ‘Creating a Vision for the Oxford-Cambridge Arc’ refers to the importance of the role of the NPPF to deliver the economic pillar of objectives for the corridor. In principle this reflects use of the standard method as the expected starting point to identify housing needs within the Arc but further reflects observations in the initial consultation and the role of the PPG that may necessitate delivery of higher levels of housing, setting out considerations such as:
- *“developing an Economic Strategy, supported by strong economic evidence, to identify the policies, locations and investment needed to deliver the Arc’s potential for sustainable and green economic growth; and*
 - *setting policies to make sure growth is felt by all communities and the Arc becomes a better place to live and work for all, such as by providing more housing in the right places, making sure people can move around by public transport and other infrastructure, and enhancing the Arc’s natural capital”*
- 3.19 The main implication of this component of the Arc Spatial Framework reflects circumstances where the calculation of local housing need will not result in sufficient workers in the right locations to achieve the full potential of sustainable patterns of economic development.

3.20 In relation to the Council's evidence base there appear to be significant issues with their assumptions for labour demand and labour supply techniques to forecast future changes in jobs and the requirement for additional workers.

3.21 In-particular, the Council's Employment Topic Paper:

- Does not use a range of economic forecasts (utilising only the East of England Forecasting Model (EEFM2019) baseline scenario only)
- Does not consider a past take-up scenario for jobs growth and delivery of employment floorspace
- It is likely to significantly over-estimate the number of jobs associated with the increased working-age population based on the LHN (the Council's employment land scenarios set out no assumptions on economic activity rates or commuting - the baseline EEFM assumptions are not dissimilar to LHN in terms of additional dwellings and persons required to meet the jobs forecast).
- It takes no account of engagement with the LEP or forecast Spatial Framework scenarios (that may result in a higher demand for labour)

Remedy

3.22 Failure to take account of these factors means that the Local Plan 2040 is more likely to result in conflict with the emerging priorities of the Arc Spatial Framework and it is recommended that a range of jobs-led scenarios are tested prior to determining the housing requirement for the Local Plan 2040 and selecting an appropriate strategy.

Paragraph 1.14 (Scope of the Plan) – Object

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

Reasoning

3.24 As set out in the Spatial Framework consultation document (paragraph 5.5) the Arc demonstrates poor affordability where development has not kept pace with need. That is exactly the position in Bedford resulting from the approach adopted in the Local Plan 2030.

- 3.25 This means (at paragraph 5.7) it is an aim of the Framework to ensure that the Framework sets policies to enable ***housing needs to be met in full, including much-needed affordable housing***
- 3.26 This sits alongside strategic decisions where direction will be provided by the Framework e.g., implementation of East-West Rail, identification of Opportunity Areas and support for the delivery of previously developed land.
- 3.27 What this means in practice is that prioritizing opportunities to meet full development needs is an important component of the place-making pillar as part of a joined-up approach providing for sustainable communities.
- 3.28 The Council's proposed in its Preferred Options consultation proposals would sustain a very substantial shortfall against minimum annual local housing need until at least 2030. Due to only considering a horizon to 2040 and as a result of likely timescales for the characteristics of larger-scale development (including new settlements) it is furthermore highly likely a significant shortfall against full development needs will persist until 2040 and beyond.
- 3.29 The Council's proposed strategy offers no flexibility and choice to address the current and persistent failure to meet needs in full. Our assessment indicates that current levels of development are likely to become significantly constrained substantially before any of the longer-term solutions proposed as part of the Preferred Options achieve significant delivery. Realistic assumptions must also be made in relation to new larger-scale developments.

Paragraphs 1.47-1.48 (Neighbourhood Planning) – Object

- 3.30 The Council's consultation document considers the role for development allocations to be identified in Neighbourhood Plans (as a result of the strategy in the Local Plan 2030) in the context of updates to the development strategy explored via the Preferred Options.
- 3.31 These representations identify that the consultation fundamentally fails to assess the role and ability of Neighbourhood Plans in meeting the requirements for sustainable development (including housing delivery) in the period to 2030. The consultation proposals also provide no clarity on the impact of meeting additional requirements for growth in terms of whether the policies in 'made' plans will remain in general conformity with the development strategy nor how further allocations might be provided for in an effective and positively prepared manner.

Reasoning

(i) Relationship with Delivery of the Area's Strategic Priorities

- 3.32 Paragraph 1.47 of the consultation proposals repeats the strategy outlined in Policy 4S of the adopted Local Plan. This does not confirm a realistic prospect that all 2,260 units will be delivered before 2030. There are outstanding objections to several of the emerging Neighbourhood Plans at Key Service Centres (in particular at Great Barford).
- 3.33 At paragraph 1.48 the Borough Council only provides vague indications of where further engagement might take place with parish councils to meet additional requirements for growth where a range of suitable sites are identified.
- 3.34 This paragraph is inconsistent with the intentions for a stepped trajectory and the NPPG for reviewing NDPs (which should encourage early review when strategic policies have changed). That is an inevitable consequence of the development plan in Bedford given its current failure to address levels of growth in accordance with the standard method. The Borough Council's own evidence indicates the strong likelihood of sites where early delivery can be prioritised. This does not demand that meeting increased requirements for growth should extend beyond 2030.
- 3.35 Paragraph 28 of the NPPF2021 reaffirms the role for Neighbourhood Plans in providing for non-strategic allocations. Paragraph 29 confirms this must be within the context of Neighbourhood Plans that do not promote less development than set out in adopted strategy policies (which in this case will be replaced in the Local Plan 2040). Paragraph 66 of the NPPF2021 outlines that strategic policies should set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. This is an important distinction from the 2012 version of the Framework. However, the Council's testing of options for the Local Plan 2040 rolls forward a 'one-size fits all' distribution of potential levels of growth in Key Service Centres and Rural Service Centres.
- 3.36 In the context of Great Barford these representations recommend that the allocation of additional sites is confirmed within the Bedford Local Plan 2040, rather than deferred to a review of Neighbourhood Plans. The particular advantage of this approach in the context of

our client's Willoughby Park proposals reflects the ability to confirm support for a comprehensively planned village extension which is in one single ownership and to set out through the policies of the development plan the opportunity to contribute towards a number of the Plan's objectives (including delivery of a new Countryside Park and GP Surgery).

Section 2 (Draft Vision) – Object

- 3.37 This section addresses two main themes. It firstly sets out the shortcomings of the Vision in terms of reflecting comprehensive opportunities for sustainable development across the borough. Secondly, it addresses that while there are many positive aspects of outcomes sought under the vision these will not be addressed as part of the strategy due to the Council's selected Preferred Options.

Reasoning

- 3.38 The draft Vision sets out:

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

- 3.39 This aspect of the Vision will not be achieved in the context of the Council's Preferred Options without specifying a further contribution towards the increased need from development at Great Barford.

- 3.40 The Vision further states:

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

- 3.41 This would imply a requirement for additional growth, which the preferred options exclude for a significant number of centres. The draft Vision fails to address that it is part of the role of the Local Plan review (and resulting updates) to address strategic priorities deferred as a consequence of the Local Plan 2030 (for example expansion of primary healthcare and green infrastructure).

- 3.42 The Vision also fails to reflect that the proposed development strategy is not looking to provide for any additional growth in rural areas as part of an uplift to meet housing needs in full before 2030.

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

3.44 The Vision is artificially constrained as a result of the Council's current position on Preferred Options. There is no reason that other sustainable developments cannot achieve complementary and significant advantages for Green Infrastructure provision (e.g., specifically the provision for a Countryside Park within our client's Willoughby Park proposals).

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

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

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

3.46 The principle of these objectives is supported but in the case of Great Barford is reliant on confirming support for the allocation of additional growth given that the emerging Neighbourhood Plan will not deliver these aims.

4.0 REPRESENTATIONS – GROWTH AND SPATIAL STRATEGY OPTIONS

Comments on the Strategy Options and Supporting Evidence

- 4.1 The section of the representations provides observations on the soundness of the Council's overall approach towards preparation of the Local Plan 2040 and identification of the strategic priorities it is required to address. Comments specifically relate to Chapter 3 of the consultation document.
- 4.2 Notwithstanding these comments, the next section (Section 5) of these representations deals with our client's in-principle support for those components of the Preferred Options that include growth within the 'east' transport corridor parishes and principally Great Barford.
- 4.3 Issues relating to the ability of the Council's approach to maintain a rolling five year supply of deliverable sites (including as part of its proposed use of a 'stepped trajectory') are dealt with separately in Section 6.

Paragraphs 3.10 and Preferred Options 2a-2d: Component of Rail-Based Growth 'Pink' Growth Strategy Options) – Object

- 4.4 The opportunity for transformative change resulting from the delivery of East-West Rail within Bedford Borough is not disputed. However, the Council's own evidence demonstrates that the level of rail-based growth at Kempston Hardwick/Stewartby and Wixams relied upon as part of its Preferred Options is unsound. National Planning Practice Guidance ID: 68-020-20190722 states that a pragmatic approach should be taken when considering the intended phasing of sites, where the authority may need to provide a greater degree of certainty than those in years 11-15 or beyond. The PPG expands on this by stating that where longer-term sites are relied upon evidence must be available to demonstrate that they will come forward within the timescales envisaged and at a rate sufficient to meet needs over the plan period (ID: 68-019-20190722).
- 4.5 While these sections of the PPG post-date the NPPF2012 it is the case that the Council has historically failed entirely in setting out realistic timeframes for the development of complex sites. These shortcomings have particularly affected Town Centre sites in the past, which the Council will now unsuccessfully rely upon to sustain completions against the housing requirement in the Local Plan 2030. We argued at the previous Local Plan Examination that such sites should be identified as developable no earlier than the 11-15 year period.

- 4.6 These issues with existing sites will be compounded in the Council's trajectory for the Local Plan 2040 (meaning that even its proposed 'stepped approach' against a requirement of 970dpa to 2030 will not be effective). These representations further demonstrate the lack of evidence to consider rail-based growth in the A421 corridor as developable any earlier than years 11-15 of the plan period (if not beyond) thus rendering the Council's Preferred Options entirely unsound.

Reasoning

- 4.7 The Council's own Development Strategy Topic Paper identifies multiple risks to the rail-based component of growth in the A421 corridor, including:

- Delivery of new rail stations is proposed, but not yet confirmed.
- Lead in times for remediation of the Kempston Hardwick area and delivery of new rail stations mean that development in this part of the transport corridor will occur later in the plan period.
- Detailed analysis of context and density / storey heights to establish appropriate place making for the rail based growth at Kempston Hardwick and Stewartby has yet to be undertaken.
- The land at Kempston Hardwick is currently being promoted for employment development.

- 4.8 These points confirm that the Council's extremely wide range of potential quanta for the development of rail-based growth are not currently informed by evidence of site-specific opportunities assessed as suitable, available, or achievable. This means that there is no justification whatsoever for the levels of development summarised at paragraph 3.12 of the Council's Topic Paper:

*"Transport corridor – rail based growth: land within the parishes of Kempston Hardwick, Stewartby and Wixams. On the assumption that new rail stations will be delivered at Wixams and Stewartby / Kempston Hardwick, ambitious growth is assumed at both Wixams and Stewartby / Kempston Hardwick in the range of 1,500-3,000 dwellings at Wixams and 2,500-5,000 dwellings at Stewartby / Kempston Hardwick **by 2040**. Within the options two levels of development are tested: a lower option total figure of 5,500 dwellings (2,000 at Wixams and 3,500 at Stewartby / Kempston Hardwick) and a higher option of 7,500 dwellings (3,000 at Wixams and 4,500 at Stewartby / Kempston Hardwick)"*

- 4.9 There is no evidence to indicate these totals as developable in the period to 2040. In the absence of site-specific testing the Council can have no grounds to suggest how constraints might be overcome, when infrastructure will be provided and whether the extremely high levels of development required to meet these totals over a very short period between

sometime after 2030 and 2040 can be achieved.

- 4.10 The extent of this uncertainty is summarised in footnote 1 on pp.8 of the Development Strategy Topic Paper:

“East West Rail are currently consulting on two options for the Marston Vale Line; one which retains the current stations at Stewartby and Kempston Hardwick, and another that replaces them with a new station (tentatively named “Stewartby Hardwick”) at Broadmead Road. This component of growth is based on development around the new or existing stations in conjunction with development around the new station at Wixams. These stations could provide a focal point for higher density growth supported by the sustainable travel options offered by new and enhanced rail services.”

- 4.11 The consultation referred to recently closed in June 2021 and final decisions on the ‘Concept’ for stations on the Marston Vale line are awaited. For the avoidance of doubt, the expected timeframes set out in the most recent Consultation Document indicate that a Development Consent Order may be obtained by 2024 and construction on the rail works may commence in 2025. However, this does not provide a clear timetable for the delivery of individual projects and upgrades. Stage 05 (‘Construction’) is summarised as follows:

“Once we’ve complied with any initial conditions or requirements included in the Development Consent Order, the government will consider the full business case for the Project to make the final decision to proceed. Following further conversations with the public and stakeholders, can start to construct your new railway.”

- 4.12 The potential for residential development to occur in conjunction with the delivery of new stations as intended by the Council is likely to require a substantially longer lead-in timeframe.
- 4.13 The Council has previously acknowledged that longer lead-in timeframes must be allowed for as part of redevelopment of the Stewartby Brickworks (Policy 25) development plan allocation as it exists in the LP2030. The Local Plan trajectory anticipates delivery of only (at most) 100 units in 2029/30 before the end of the current plan period. The scheme is in effect accepted as an 11-15 year developable site.
- 4.14 Application proposals under reference 18/03022/EIA (validated November 2018) benefit from an Officer recommendation to grant planning permission subject to S106 agreement. In practice, this does not alter any conclusions regarding the deliverability/developability of the site and likely timescales. Discussions surrounding the draft S106 obligation would be anticipated to be extensive. This is reflective of the constraints of the site and gaps in the

evidence base for the LP2030, notably:

- Around 19ha of the site falls within Flood Risk Zone 2. Furthermore, a small proportion (around 1ha) is located within Flood Risk Zone 3a/3b.
- A requirement to confirm costs and timescales for the requisite link from the new development across the railway could be achieved (notwithstanding ongoing deliberations regarding East-West Rail). whilst Network Rail is identified as a key stakeholder for preparation of the Council's Infrastructure Delivery Plan (December 2018) no project associated with the rail crossing is identified, costed, or phased over the course of the plan period.
- The Council's Local Plan Viability Assessment (BNP Paribas, November 2017 (paragraph 6.16)) notes the requirement for significant investigations to assess on-site constraints for this complex site, with a view to preparation of a development brief, all prior to detailed viability work taking place.

4.15 It is our experience from monitoring the delivery of the nearby Wellingborough East Urban Extension that the construction of crossings over rail lines can take significant periods of time and are unpredictable.

4.16 The Officer Report in relation to the current position on securing a policy-compliant (and CIL122-compliant) package of contributions towards the site's ability to enhance use of rail-based transport states:

"Policy 25 iv. Sets out a need for enhancements to the existing railway station environment including accessibility, provision of facilities and security. If the railway station stays in its current location the increased permeability of the site will improve connections from the village to the station. The Railway Station however does not fall within the application site and is under review as part of the wider East West Rail scheme, details of which are not confirmed at this time."

4.17 Given this uncertainty we would anticipate it is highly likely that a S106 obligation may not be entered into until these uncertainties are resolved or that otherwise it would be expected that this would be subject to future Deeds of Variation or revisions to the scheme resulting in delays to the delivery of housing.

4.18 The Council's Preferred Options also identify a contribution of around 2,000-3,000 further units to be allocated at Wixams, to correspond with eventual delivery of a further new station as part of the wider scheme. These units will be additional to the remaining capacity identified in the Bedford Local Plan 2030 trajectory and units to be delivered as part of committed development in Central Bedfordshire's Local Plan (which already includes a Southern Extension to the scheme).

- 4.19 The longstanding issues with delivery of the Wixams New Station are illustrative of the impacts upon rates of development likely to be experienced at Stewartby/Kempston Hardwick. Evidence presented at LP2030 Examination demonstrated that the build-out rate of Wixams within Bedford Borough has been 96 dwellings per annum over the 10-year period to 2018. Development has since commenced in Central Bedfordshire, increasing the overall build-rate but corresponding with a reduction of activity in Bedford Borough.
- 4.20 Delivery of the Station has been delayed by over 11 years with the project still not expected to commence construction until 2023 at the earliest. Commissioning of a detailed design scheme for the proposed station was able to progress earlier in 2021 contingent on the basis of consultation on the proposed northern alignment of East-West Rail.
- 4.21 While any final decision is awaited on the outcome of the Bedford-Cambridge phase of East-West Rail there remains a risk that the time-limited period for funding available from the lead developers of the Wixams scheme will expire and result in the project not being delivered (or requiring additional monies to address the shortfall in project costs).
- 4.22 In the context of the above delays and uncertainty and in the absence of a clear timeframe for delivery of the station the Council's Preferred Options present no site-specific evidence of how the additional capacity at Wixams could be achieved over the plan period and at an appropriate build-out rate (in addition to the delivery of extant commitments).
- 4.23 The characteristics of any potential increase in allocations at Wixams also represents an issue of cross-boundary strategic importance, given that the scheme is being delivered across local planning authority boundaries and the requirement for partial review of the Central Bedfordshire Local Plan 2015 to 2035. This could lead to any potential for additional development being required to address the unmet needs of neighbouring authorities (or affecting the administrative boundaries within which the most appropriate land should be identified).

Remedy

- 4.24 These representations demonstrate that the rail-based growth component of the Council's Preferred Strategy Options requires substantial further refinement and site-specific testing. This is likely to substantiate a significant reduction in assumptions regarding the potential for development within the plan period, which can be effectively mitigated through pursuing a



'hybrid' strategy for development in sustainable locations across the borough.

5.0 PROPOSED APPROPRIATE STRATEGY– OPTION 2D AND A ‘HYBRID’ APPROACH

5.1 This section of our representations should be read alongside the standalone Review of the Council’s Draft Sustainability Appraisal (copy at Appendix 6). The conclusions of the review support the Modifications in this part of the representations. This section also reinforces our specific comments on the Council’s Preferred Strategy Options.

Paragraph 3.17 and Option 2d – Comment

5.2 These representations endorse the inclusion of the ‘east’ corridor parishes as part of Preferred **Option 2d** but in practice indicate that this is illustrative of a need for a ‘hybrid’ approach to provide for an appropriate strategy in accordance with national policy and guidance (NPPF2021 paragraph 35(b)).

5.3 These representations conclude that any selected strategy option that **does not** include growth in the ‘east’ corridor parishes would be unsound and fail to comprise an appropriate strategy or genuine reasonable alternative for the purposes of the Sustainability Appraisal. This is due to soundness issues identified with the delivery of large-scale strategic growth comprising other components of the Council’s Preferred Options.

5.4 The benefits of **Option 2d** reflect the ability to promote and maximise the benefits of what is in-effect village-related growth at the Key Service Centre of Great Barford, which is very sustainably located within the A421 corridor. Growth at Key Service Centres is an approach that the Council has accepted as sustainable in the spatial strategy of the adopted LP2030, and the evidence base for the Local Plan 2040 indicates no in-principle constraint to capacity for further development at Great Barford that could not be adequately mitigated.

5.5 Endorsement of growth at Great Barford under **Option 2d** in the context of a ‘hybrid’ strategy recognises that there is no arbitrary distinction between ‘village-related’ growth and support for development in the ‘east’ and ‘south’ corridor parishes in terms of their capacity to contribute towards sustainable development. The benefits of ‘village-related’ development do not suddenly materialise only where Key Service Centre and Rural Service Centres are located in the A421 corridor and do not evaporate altogether outside of it.

5.6 To achieve the objectives of the emerging Local Plan 2040 it is necessary to support further village extensions to the settlement of Great Barford, incorporating our client’s Willoughby

Park proposals, to secure contributions to sustainable development that are assessed favourably in the draft Sustainability Appraisal (including new green infrastructure, community facilities and opportunities for recreation). The potential to secure these benefits should be reflected within the Council's conclusions on site selection and evidence base for the submission draft version of the Plan, once finalised, including the Infrastructure Delivery Plan and Settlement Hierarchy Review, which both remain awaited.

Draft Sustainability Appraisal – Suggested Appropriate Strategy Alternative

- 5.7 A 'hybrid' option would assign the 'village-related' growth component only to those settlements outside of the 'east' and 'south' corridors. Levels of development, for the purposes of an indicative distribution, have been retained at 500 units in Key Service Centres and 35 units in Rural Service Centres albeit these are arbitrary figures and should be determined on a case-by-case basis. Wixams has been excluded from the total for Key Service Centres (reflecting its inclusion in the locations for rail-based growth). The only exception, taking account of this, is an increase of 215 units in the distribution to Oakley (based on its suggested reclassification as a Key Service Centre set out in representations on behalf of other clients submitted to this consultation).
- 5.8 For the A421-based components of the strategy the total distribution to the 'east' corridor parishes are retained at the figure of 750 dwellings in the Council's Preferred **Option 2d**. This marginally exceeds the Council's arbitrary figures applied for the purpose of testing Great Barford, Roxton and Willington as 'village-related' growth but would in our view represent a more realistic starting point taking account of the capacity for growth at Great Barford and in-particular our client's Willoughby Park site. There is no site-specific justification or settlement-specific justification as to why this figure should be limited to 750 dwellings.
- 5.9 In terms of the 'hybrid' strategy this could accommodate greater flexibility in terms of large-scale strategic growth included in the strategy options. We have included the Council's minimum figures for inclusion of rail-based growth at Kempston Hardwick/Stewartby and New Settlements in either the A6 or A421 corridor, which is more likely to reflect realistic timescales for development.
- 5.10 Including both components, if required (New Settlements and rail-based growth) would comfortably exceed the minimum 12,500 units required from additional allocations, with an

appropriate buffer for flexibility and contingency (particularly in terms of the prospects for meeting increased needs before 2030). There is no reason higher quanta could not be included as part of an extended plan period. Equally, this could allow some settlements outside of the transport corridors to be excluded from further village-related growth. We would, however, not recommend this where Neighbourhood Plans being prepared have failed to address important strategic priorities (as at Oakley and Sharnbrook, for example).

5.11 The 'hybrid' strategy based on these components are summarised in Table 1 below:

Table 1: Illustrative Hybrid Strategy Option Including Village-Related Growth

	Component	Option 2d	% Of Total	Option 3c	% Of Total	Option 3 - Hybrid	% Of Total	Notes
	Within urban area	1500	12%	1500	12%	1500	11%	
	Adjoining urban area	1500	12%	1500	12%	1500	11%	
	Village related	0	0%	4280	35%	1890	14%	Excluding 'east' and 'south' corridor parishes and Wixams
A421-based	Growth focused on Kempston Hardwick, Stewartby & Wixams (Rail based growth)	5,500	44%	0	0%	3915	29%	Use of minimum figure from Option 2c
	Transport corridor south	750	6%	0	0%	1535	11%	
	Transport corridor east	750	6%	0	0%	750	6%	Retention of higher figure from Option 2d
	New settlements (A421 corridor)	2500	20%					
	New settlements (A6 corridor)	0	0%	4900	40%	2400	18%	Use of minimum New Settlement total (Colworth)
	Total	12500	100%	12180	100%	13490	100%	

5.12 We have utilised the 'hybrid' strategy to consider an assessment of effects in-line with the Council's Sustainability Appraisal framework. When the 'hybrid' strategy is compared with the standalone findings for growth components and the Council's Options 2d and 3c, as well as the 'do nothing' scenario, it is apparent that the potential benefits towards sustainable

development are enhanced.

5.13 This is as a result of recognising that the potential negative effects the Council assigns to village-related growth are incorrect and, in any event, inaccurate because it ignores the location of some Key Service Centres and Rural Service Centres within the A421 corridor. It also recognises that some the benefits of what is in reality 'village-related' growth in the 'east' and 'south' transport corridors will be shared across settlements elsewhere in the hierarchy. Likewise, the assessment of positive effects for strategy options including the 'east' transport should be increased due to the ability to provide for sustainable village extensions at Great Barford. The results are summarised in Table 2 below:

Table 2: Assessment of Effects – 'Hybrid' Strategy Option and Alternatives

SA Objective	Growth Component		Spatial Options			Do Nothing
	Village-Related Growth	A421-based Growth	Option 2d	Option 3c	Hybrid	
Objective 1	Negative	Negative	Negative	Major Negative	Negative	Negative
Objective 2	Negative	Negative	Negative	Negative	Uncertain	Negative
Objective 3	Major Negative	Positive	Uncertain	Negative	Uncertain	Major Negative
Objective 4	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
Objective 5	Negative	Positive	Positive	Positive	Positive	Neutral
Objective 6	Major Negative	Major Negative	Uncertain	Uncertain	Uncertain	Major Negative
Objective 7	Negative	Uncertain	Uncertain	Uncertain	Uncertain	Negative
Objective 8	Negative	Negative	Negative	Negative	Uncertain	Negative
Objective 9	Negative	Positive	Major Positive	Positive	Positive	Negative
Objective 10	Negative	Positive	Uncertain	Uncertain	Uncertain	Negative
Objective 11	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral
Objective 12	Positive	Positive	Positive	Positive	Positive	Negative
Objective 13	Uncertain	Uncertain	Uncertain	Uncertain	Positive	Uncertain
Objective 14	Uncertain	Uncertain	Uncertain	Uncertain	Positive	Uncertain
Objective 15	Major Negative	Positive	Positive	Major Negative	Positive	Major Negative

6.0 DELIVERY ASSESSMENT AND PROPOSED STEPPED TRAJECTORY

Paragraphs 3.4 – 3.5 (Spatial Strategy – Proposed Stepped Trajectory) – Object

6.1 This section of the representations should be read alongside the separate Delivery Assessment included at Appendix 5. This addresses the ability of the Council approach to maintain a rolling five year supply of deliverable sites (including as part of its proposed use of a ‘stepped trajectory and upon proposed adoption of the Local Plan 2040). The Delivery Assessment also illustrates that the Council is unable to demonstrate a five year supply of deliverable sites based on its own published position (at a base date of 1 April 2019) or when this is rolled forward to 1 April 2021.

6.2 In summary, the Council’s proposed approach to managing the delivery of housing over the plan period is unsound. The Council indicates a proposed 20-year plan period (2020 to 2040) for the Local Plan Review. The Local Plan Review must meet minimum annual local housing need calculated in accordance with the standard method. Planning Practice Guidance ID: 68-031-20190722 answers the question ‘how can past shortfalls in housing completions against planned requirements be addressed?’ and states:

“Where the standard method for assessing local housing need is used as the starting point in forming the planned requirement for housing, Step 2 of the standard method factors in past under-delivery as part of the affordability ratio, so there is no requirement to specifically address under-delivery separately when establishing the minimum annual local housing need figure. Under-delivery may need to be considered where the plan being prepared is part way through its proposed plan period, and delivery falls below the housing requirement level set out in the emerging relevant strategic policies for housing.”

6.3 Based on the emerging proposals the performance of delivery in the period 2020 to 2023 will be relevant to assessing the soundness of the Local Plan 2040. Performance for this period will therefore be substantially informed by the Council’s current evidence of deliverable supply against the Local Plan 2030 housing trajectory (and extant consents).

6.4 The Council’s Preferred Options consultation proposals also indicate that it is likely to rely on a ‘stepped trajectory’ for the plan period to 2030 (retaining an annual requirement of 970 dwellings per annum). The Preferred Options principally rely on large-scale strategic sites with limited prospects for delivery within five years from adoption (2023 to 2028). The Council’s supply for this period will therefore also substantially be informed by the Local Plan 2030 trajectory (and characteristics of sites identified in Neighbourhood Plans).

- 6.5 The evidence for sites identified in the Local Plan 2030 trajectory, as of 1 April 2021, reviewed in the separate Delivery Assessment, demonstrates that these do not achieve an early prioritisation of housing delivery. This reflects issues raised throughout the Local Plan 2030 Examination relating to constraints to viability and availability of the sites identified, particularly within the Town Centre.
- 6.6 Regarding Town Centre sites identified in the Local Plan 2030 and the associated longstanding delays to development there is no mention of a Development Corporation in either the Council's consultation document or consultation on a Vision for the Oxford-Cambridge Spatial Framework. The Council has previously indicated that this may be the route to unlocking sites and overcoming barriers to development for which there is currently no clear solution.
- 6.7 In these circumstances the Council's proposals to pursue a stepped trajectory are contrary to national policy and guidance. PPG ID: 68-021-20190722 answers the question 'when is a stepped requirement appropriate for plan-making'? and sets out:

*"A stepped housing requirement may be appropriate **where there is to be a significant change in the level of housing requirement between emerging and previous policies** and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. Strategic policy-makers will need to identify the stepped requirement in strategic housing policy, and to set out evidence to support this approach, **and not seek to unnecessarily delay meeting identified development needs. Stepped requirements will need to ensure that planned housing requirements are met fully within the plan period.** In reviewing and revising policies, strategic policy-makers should ensure there is not continued delay in meeting identified development needs.*

Where there is evidence to support a prioritisation of sites, local authorities may wish to identify priority sites which can be delivered earlier in the plan period, such as those on brownfield land and where there is supporting infrastructure in place e.g., transport hubs. These sites will provide additional flexibility and more certainty that authorities will be able to demonstrate a sufficient supply of deliverable sites against the housing requirement." (SPRU emphasis)

- 6.8 There are four key issues to highlight with the Council's proposed use of a stepped trajectory:
- The change in housing requirement cannot be considered significant. The Council was fully aware of these circumstances when the Local Plan 2030 was adopted with the requirement for early review. Planning for a difference in the annual requirement of around 305 dwellings per annum (LHN of 1275 vs OAN of 970) is a relatively modest change in the context of a recently adopted Local Plan that should maintain a minimum rolling supply against the OAN figure
 - The Local Plan 2030 unnecessarily sought to delay meeting needs in accordance with

the government's latest policy. Pursuing a stepped trajectory simply perpetuates that problem

- The current Local Plan 2030 housing trajectory provides for no flexibility or certainty (particularly given issues with Neighbourhood Plans and Town Centre sites). The Council's Preferred Options provide no resolution to this.
- The use of a stepped trajectory will not ensure needs are met in full. There will be a substantial shortfall against the stepped requirement of 970dpa to 2030 (based on the latest information regarding supply). A reliance on large-scale strategic sites beyond 2030, for which there is a poor record of success in the borough in terms of timescales and rates of delivery, does not provide a reasonable prospect of development in accordance with PPG ID: 68-019-20190722)

6.9 Those issues relating to the current Local Plan 2030 mean that there is no prospect whatsoever that extant commitments and allocations alone would allow the Council to demonstrate a five year supply of deliverable sites based on the calculation of minimum annual local housing need upon adoption of the Local Plan 2030.

6.10 Our analysis demonstrates that the Council's proposed approach to rely on a stepped trajectory is also flawed. This will not achieve a five year supply of deliverable sites upon adoption of the Local Plan 2040 without significant support to prioritise the early delivery of additional sites.

7.0 RESPONSE TO SITE ASSESSMENT PRO-FORMA (CALL FOR SITES ID 604 AND 645)

Introduction to Site and Proposals

- 7.1 Our client's land interests were submitted to Bedford Borough Council as part of the 'Call for Sites' exercise undertaken to inform preparation of the emerging Local Plan 2030.
- 7.2 Two 'Call for Sites' references exist for our client's site, recorded under LPA ID 604 and 645. It is also noted that a third Proforma exists for the site LPA ID ref. 355, however, this was not submitted by our client (nor by DLP) and therefore we will not be providing any response on this particular assessment.
- 7.3 In commencing an immediate Review in accordance with Policy 1 of the adopted Plan, the Council is, as required, seeking to ensure that future needs for growth are provided for in line with government policy i.e., local housing need calculated using the standard method. The review of the Local Plan is an important opportunity to address issues regarding flexibility and choice in a variety of locations for growth, as well as ensuring a balanced allocation of land for development sufficient to meet future needs, and to ensure planning policy is up to date.
- 7.4 Whilst two development options have been considered for this site (100- and 500-units respectively), it is recognised that in light of the extensive scope for the review of the Local Plan 2030, an appropriate strategy will require a combination of multiple spatial options over the plan period. In the case of our client's land at Willoughby Park (ID: 645), this would represent a logical spatial option for consideration as the Site is located at the heart of the A421 corridor spatial **Option 2d**. We believe the site offers substantial opportunities to meet the Borough's increased requirements for growth without significant constraints to development or barriers to infrastructure.
- 7.5 As a Key Service Centre, Great Barford can contribute to this option through an increased contribution towards the Borough's housing requirement in the period to 2030 and beyond.
- 7.6 In the case of our client's land the site has the potential to deliver approximately 500 units. The site, in part, was considered favourably in the Council's 2017 Consultation Paper as part of preferred options for site allocation, and the Council's 2018 HELAA records it as suitable, available, and achievable for development.

- 7.7 Furthermore, in its 2017 Assessment of Site Options the Council identified scope in elements of the site for a positive contribution towards several plan-making objectives. These conclusions remain entirely valid in the context of Great Barford's role as a Key Service Centre and specific planning considerations regarding our client's land.
- 7.8 In addition to the wider site, the Client has also explored utilising a smaller parcel of land for the development of 100-units. This has been assessed by the LPA under site ID 604. A response to this assessment is set out below, followed by a formal response made to the assessment for site ID: 645 which relates to the 500-unit option.

Site ID: 604 – Land off Roxton Road, Great Barford

- 7.9 The site extends to some 9.94 hectares of land and is proposed as a residential development site for up to 100 residential dwellings (Class C3).
- 7.10 The site will make provision for a new footpath link between the existing rights of way and the proposed development, create a large area of publicly accessible open space and introduce structural landscaping in key view areas, introduce children's play facilities. The site will guarantee and coordinate delivery of infrastructure and community facilities where relevant, a mix and range of housing and contributions to upgrading existing educational facilities in the area.
- 7.11 The site would be accessed via a single point off Roxton Road (designed to the Council's standards) and will seek to minimise disruption to the village core, avoiding the narrow historic streets.

Response to Borough Council's Site Assessment Pro-Forma (Site ID: 604)

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

Protected Species

- 7.13 Whilst a site-specific ecological assessment has not been undertaken which is directly linked to this parcel, a preliminary assessment and ecological surveys have been undertaken for a much larger parcel of land identified by site ref 645.
- 7.14 The outcome of those reports is discussed in greater detail in paragraph's 7.26 – 7.33 below, however, subject to mitigation measures it is considered that there will be no impacts on protected species. A biodiversity net gain calculation could also support any potential planning application, but it is considered that there is sufficient public open space to achieve a net gain.

Opportunities to link into the Green Infrastructure Opportunity Network

- 7.15 The Council have advised that no answers were chosen in respect of this particular matter, however, as the Council will be aware, as part of the ongoing Neighbourhood Plan examination, Great Barford Parish Council have produced a Green Infrastructure Plan (2019). This identifies two areas within our client's site for green infrastructure improvements. It is considered that the proposed masterplan for our client's site (see Appendix 3) is reflective

of the aspirations of the Green Infrastructure Plan and will seek to enhance the network through the provision of additional public open space within the site.

Best and most versatile agricultural land

- 7.16 Whilst all of the site potentially comprises of best and most versatile agricultural land according to the Natural England's Agricultural Land Classification map for the Eastern Region, all of the land surrounding Great Barford comprises of best and most versatile land and therefore any residential proposal in this location would require some loss. This does not represent an overriding constraint to development given the highly sustainable location of Great Barford within the A421 corridor and should be considered in the wider balance as part of the Council's assessment of site options. Any planning application could be supported by a detailed assessment as required.

Site ID: 645 – Willoughby Park, Great Barford

- 7.17 The site, which is in a single ownership, extends to some 48.3 hectares and is proposed as a mixed-use development comprising of up to 500 residential dwellings (Class C3), a 24 hectare (59 acre) Countryside Park; a community hub (including a new developer funded medical centre) centred on the existing Village Hall and extending the range of local recreation facilities; substantial new tree planting enhancing the village edge along Roxton Road; and, a mix of open and green spaces that can be used for multiple purposes including local play, sports areas and informal amenity areas.
- 7.18 A copy of our client's proposed Masterplan for the Willoughby Park site is enclosed at Appendix 4.
- 7.19 The site would be accessed via Roxton Road (designed to the Council's standards) and would seek to minimise disruption to the village core, avoiding the narrow historic streets. Emergency site access can also be achieved off Birchfield Road.
- 7.20 The site is bound by residential properties to the east, south and west whilst to the north the boundary of the site adjoins the A421 bypass. To the west also lies the existing community facilities including the Village Hall and its associated playing fields.
- 7.21 The site offers substantial benefits and is sustainably located within the heart of the village close to existing local services and facilities which are easily accessible by foot and cycle. The enhancement and creation of additional foot and cycle paths within the scheme design further improves the permeability of the site and connections to the surrounding area.
- 7.22 In terms of master planning, and the consideration of key facilities, we draw attention to the Great Barford Parish Council response relating to the delivery of a medical centre as part of the Great Barford West allocation within the emerging Neighbourhood Plan. Rather than clarifying the matter, this response raises further uncertainty in terms of its deliverability and where this would be located:

"We understand from Bedford Borough Council that increased lower/primary schooling provision and a new medical centre is expected to be located in the existing village with funding being provided by the new development through CIL/S106 contributions. However, the allocation site has ample capacity to deliver a primary/lower school and a new medical centre if required".

- 7.23 Our client's site is located central to the village and has the potential to deliver a medical centre at the heart of the community and without the uncertainty regarding the approach and potential location of provision resulting from the Neighbourhood Plan. This should be recognised within the site assessment proforma alongside additional facilities that could be achieved including a new community hub and recreational space.

Response to Borough Council's Site Assessment Pro-Forma (Site ID: 645)

Site Assessment Criteria

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

Protected Species

- 7.25 The Council's assessment states that they are uncertain, or insufficient information has been provided to determine whether protect species are known or likely to exist on the site.
- 7.26 Our client has undertaken both a preliminary ecological assessment (PEA) for the site and a subsequent Ecological Appraisal. These reports identify that there are no sites of international or European importance within the search area nor are there any sites of national importance. Seven County Wildlife Sites (CWS) were present in the search area, however on the basis that over half of the proposed development site is being set aside as a new Countryside Park and areas of public open space, the report concludes that this would likely encourage residents of the new development and existing residents to use the new Countryside Park as opposed to CWS that are a further distance from the site.
- 7.27 Furthermore, the CWS sites within the local area are either not publicly accessible by Public Rights of Way or the Public Rights of Way run adjacent to the CWS and not through them.
- 7.28 The Ecological Appraisal further identifies that there are no veteran trees, no rare and/or priority plants, or any rare and/or priority invertebrates at the site. Although the site offers some suitable habitat for amphibians including Great Crested Newts (GCN), no records of GCN were returned from within 500m of the site and there is a lack of ponds within the local area suitable for breeding.
- 7.29 The site is therefore considered to be of negligible value to GCN. No reptile species were recorded during the reptile survey and the site is therefore considered to be negligible value for reptiles.

- 7.30 The site is likely to be used by common breeding bird species, however it is considered that the value of the site to breeding birds is lower at the parish scale. The introduction of the Countryside Park is also considered to provide a minor beneficial impact on breeding birds. The site provides limited habitat for wintering birds and is considered of negligible value for this group.
- 7.31 Further surveys have been recommended in respect of water vole and bats; however, these would be at reserved matters stage once the design of the proposal is known. A pre-commencement badger survey is also recommended.
- 7.32 A number of mitigation measures are also recommended, and the report concludes that the adoption of these would give rise to a moderate to major beneficial impact.
- 7.33 In respect of biodiversity net gain, a calculation could be prepared to support any application, however it is considered that the introduction of a new Countryside Park would provide a considerable enhancement to both the site and surrounding area.

Opportunities to link into the Green Infrastructure Opportunity Network

- 7.34 The Council have advised that no answers were chosen in respect of this particular matter, however, as the Council will be aware, as part of the ongoing Neighbourhood Plan examination, Great Barford have produced a Green Infrastructure Plan (2019). This identifies three areas within our client's site for green infrastructure improvements. It is considered that the proposed masterplan for our client's site (see appendix 4) is reflective of the aspirations of the Green Infrastructure Plan and will seek to enhance the network through the provision of a new Countryside Park which will incorporate the existing Bridleways and Rights of Way that run through and across the site as well as the protected views as identified.

Impact on designated or non-designated heritage assets and their settings

- 7.35 The Council's assessment has identified that the proposal has the potential to cause harm to heritage assets and this harm may range from low to high. This could be addressed through a heritage impact assessment submitted as part of any planning application.

Best and most versatile agricultural land

7.36 Whilst all of the site comprises of best and most versatile agricultural land, according to the Natural England's Agricultural Land Classification map for the Eastern Region, all of the land surrounding Great Barford comprises of best and most versatile land and therefore any residential proposal in this location would require its loss. Any future planning application could be supported by an appropriate assessment as required.

Flood Risk

7.37 The Council advise that the majority of the site lies within Flood Zone 2, however this is incorrect, and we are surprised that the proforma suggests that the majority of the site has drainage constraints. According to the Environment Agency Flood Map (extract below), the site lies predominantly within Flood Zone 1 (lower flood risk and acceptable for vulnerable uses including residential) with a small portion adjacent to existing residential properties on Green End Road within Flood Zone 2 and an area of Flood Zone 3 contained only to the unnamed watercourse that runs through the site.



Figure 1: Extract of the Environment Agency Flood Map (Source: Flood Map for Planning)

- 7.38 Product 4 flood level information has been obtained from the Environment Agency and this has been overlaid onto our client's topographical survey to define the flood zones in further detail than that available on the Flood Maps. This has defined the built form area as indicated on the submitted masterplan (appendix 4), with no development proposed to be located within Flood Zone 2. This obviates the requirement for undertaking a sequential test. Appropriate buffers to the brook have also been incorporated providing a landscape corridor either side.
- 7.39 The proposed drainage strategy for the site is based on an attenuated strategy where surface water run-off is held on site in the form of 3 large detention basins and discharged to the unnamed water course that runs through the site. The catchment for the basins has been split into three separate areas each with their own network including basin and hydro brake (discharge control point) and have been located based on the topography and best strategy to serve the likely form of development. A robust position has been taken to impermeable areas and run off rates which we believe will be required by the LLFA; the discharge rate will be controlled at or lower than greenfield run off rate. The basins will be combined with an overall SuDS strategy including use of swales.
- 7.40 The location of the proposed attenuation areas has also been positioned and developed to tie directly back into the enhancements to Green Infrastructure, specifically the Green Infrastructure Plan prepared as part of the Great Barford Neighbourhood Plan.

Highways

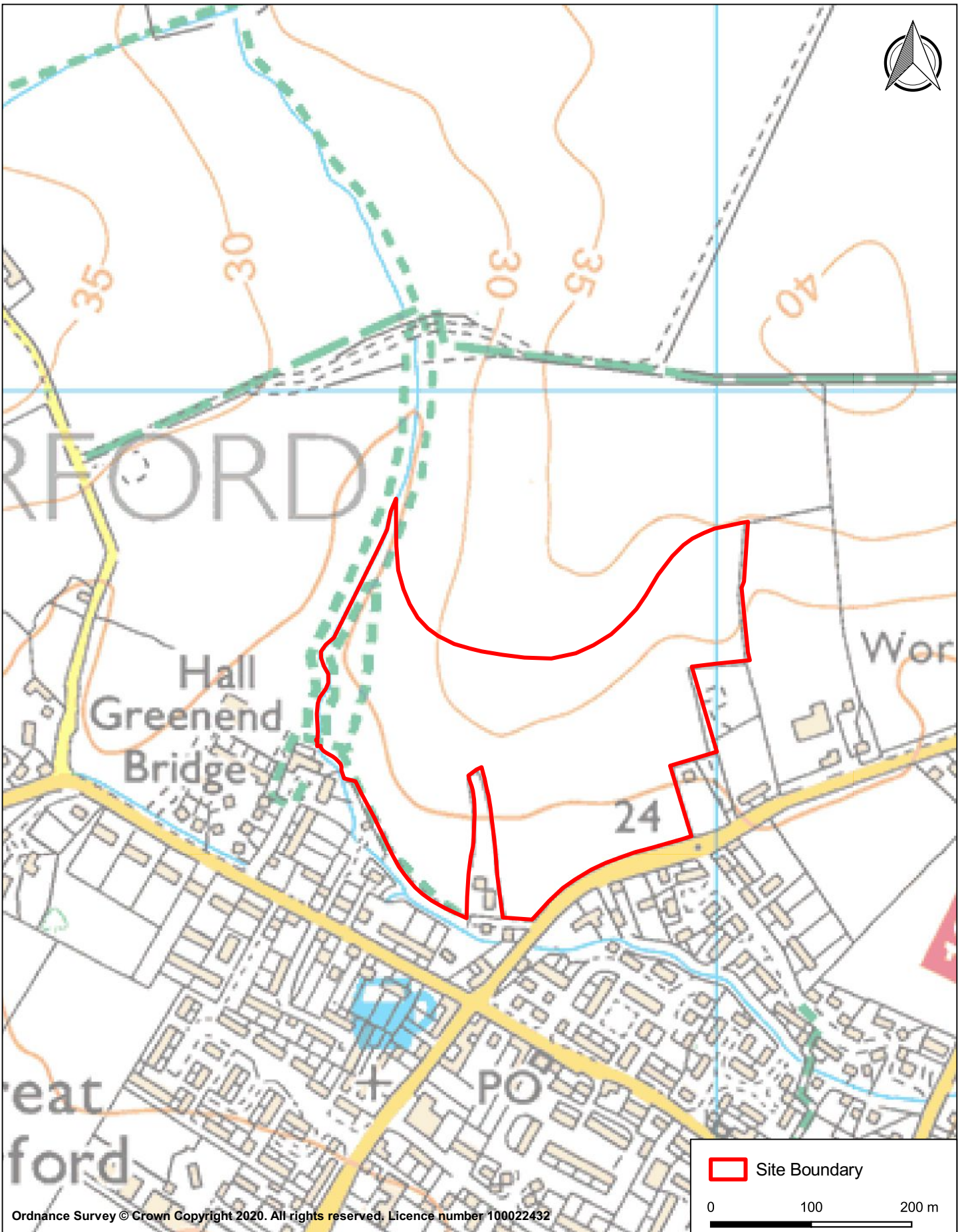
- 7.41 The enclosed masterplan shows how vehicular access would be taken from Roxton Road utilising two proposed points, the primary site access and a secondary site access which would serve a potential bus route. A potential emergency access can be taken onto Birchfield Road. Any planning application would be supported by detailed Transport Assessment that would consider the mitigation requirements in further detail.

Noise


- 7.42 It is of note that Environmental Health have raised concern surrounding noise from the bypass, however, this element of the site is reserved for a new Countryside Park and any future planning application could be supported by an appropriate noise assessment as necessary. Having regard to the details of proposals for our client's land noise does not represent a constraint to development of the land.



Appendix 1 Location Plan (Site ID: 604 – Land off Roxton Road, Great Barford)



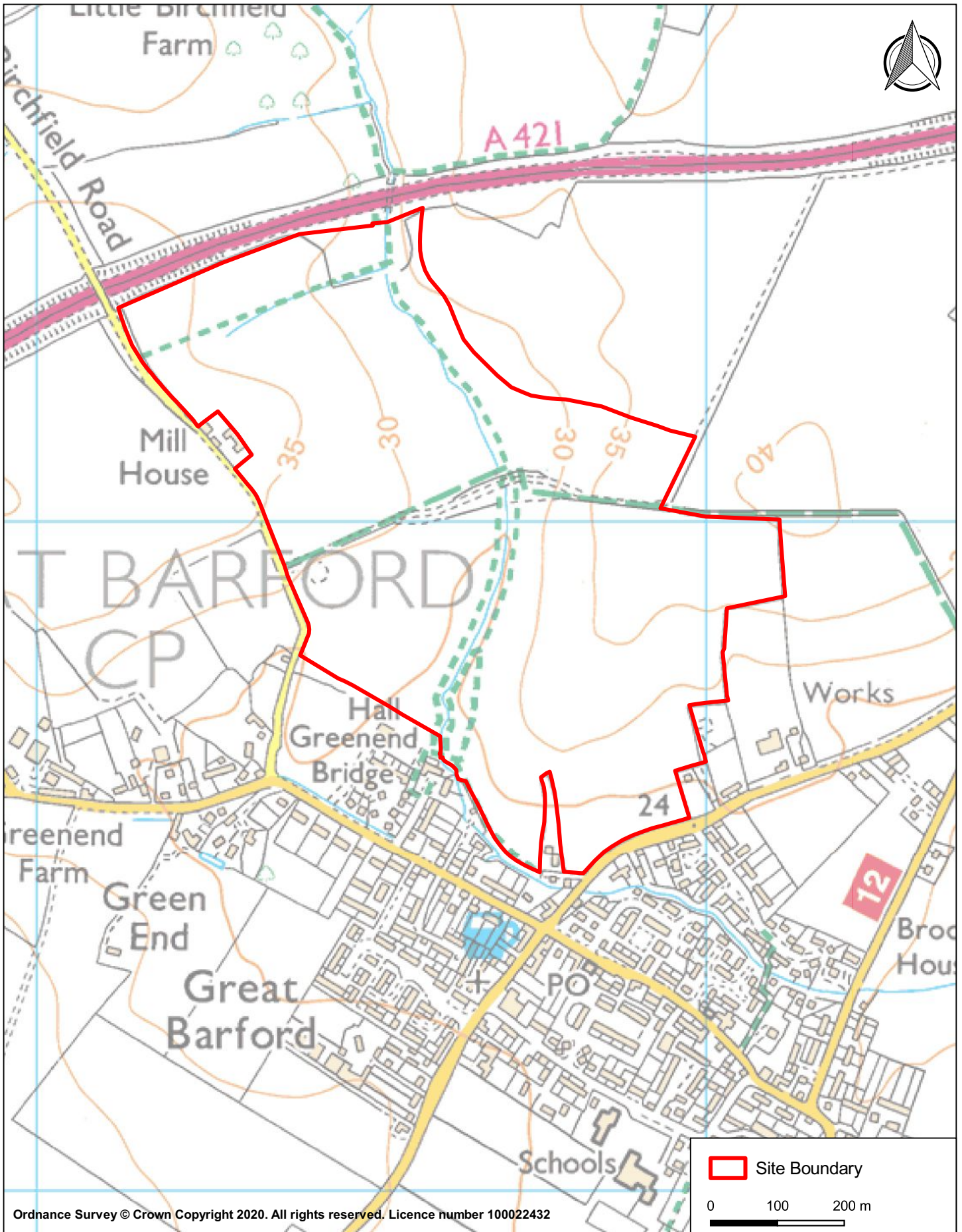
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CLIENT ORS Plc	DATE 13.08.2020	OS REF	Drawn PMG	DLP PLANNING LIMITED 4 Abbey Court, Fraser Road, Priory Business Park Bedford, MK44 3WH † 01234 832 740 f 01234 831 266 e bedford@dlpconsultants.co.uk Offices also at: Bristol, East Midlands, Leeds, London, Milton Keynes, Rugby and Sheffield	 dynamic development solutions™
	SCALE 1:5000 @ A4	DRWG NO. D07	Checked WL		
	JOB NO. BE1719-4	REV.			
PROJECT Roxton Road, Gt Barford	DRWG TITLE 100 Dwellings Option Location Plan				



BE1719-4P
Old Road Securities Ltd
Bedford Local Plan 2040 consultation response
August 2021

Appendix 2 Location Plan (Site ID: 645 – Willoughby Park, Great Barford)

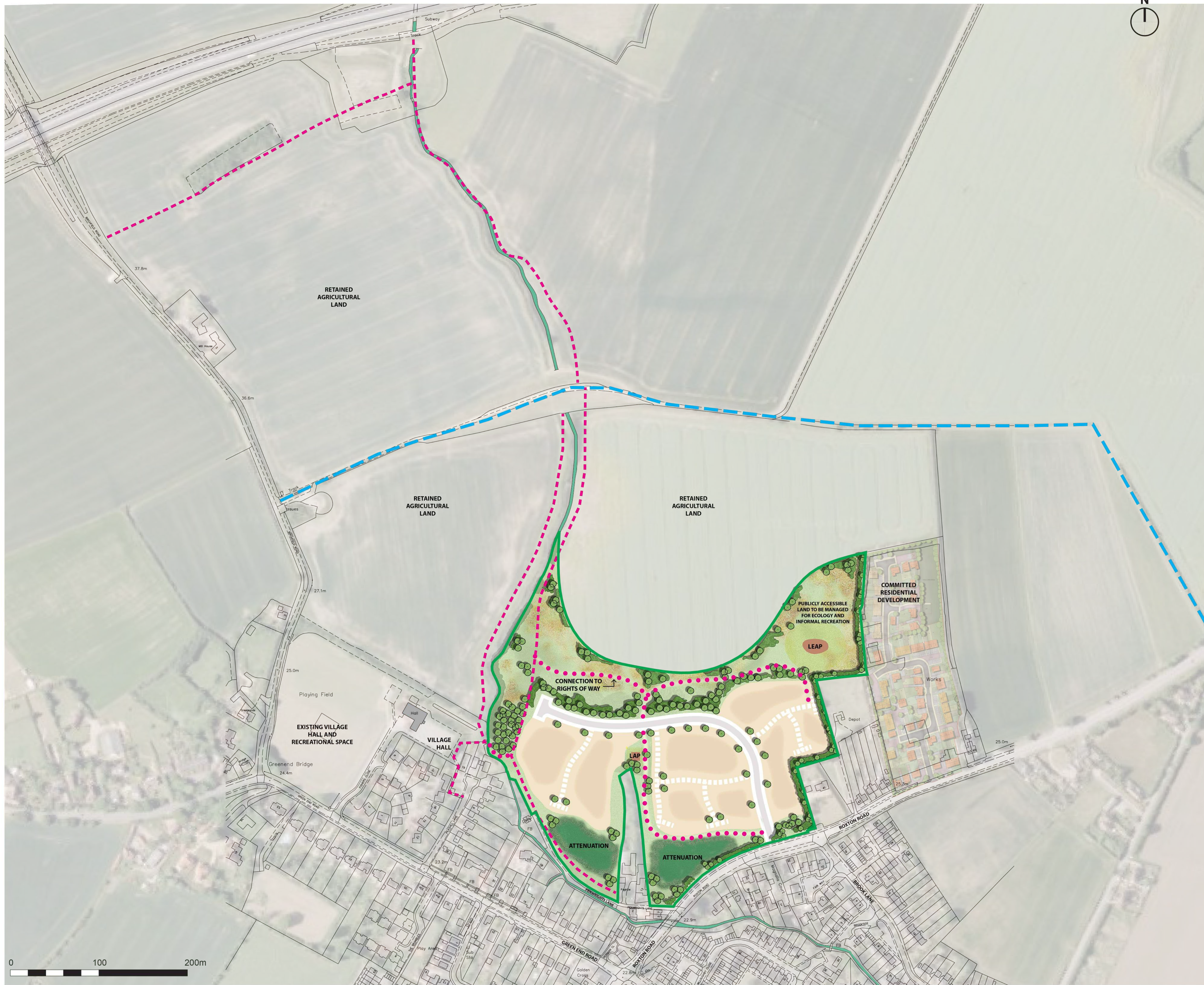


CLIENT ORS Plc	DATE 13.08.2020	OS REF	Drawn PMG	DLP PLANNING LIMITED 4 Abbey Court, Fraser Road, Priory Business Park Bedford, MK44 3WH t 01234 832 740 f 01234 831 266 e bedford@dlpconsultants.co.uk Offices also at: Bristol, East Midlands, Leeds, London, Milton Keynes, Rugby and Sheffield	 dynamic development solutions™
	SCALE 1:7500 @ A4	DRWG NO. D06	Checked WL		
	JOB NO. BE1719-4	REV.			
PROJECT Roxton Road, Gt Barford	DRWG TITLE 500 Dwellings Option Location Plan				



BE1719-4P
Old Road Securities Ltd
Bedford Local Plan 2040 consultation response
August 2021

Appendix 3 Indicative Masterplan and Land Use Budget (Site ID: 604 – Land off Roxton Road, Great Barford)



- KEY:**
- site boundary
 - existing bridleway
 - existing footpath
 - proposed footpath / cycle path
 - indicative green/amenity space
 - indicative children's play area
 - indicative attenuation area
 - indicative structural planting
 - indicative primary vehicular route
 - residential development

Project
**Land off Roxton Road,
 Great Barford**

Client
Old Road Securities plc

Drawing Title
**Land off Roxton Road -
 Illustrative Masterplan**

Job No	Date	Scale
BE1719/16	14.11.2019	1:2000 @ A1
Drwg No.		Rev.
1719(16)-SK18		B

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Indicative Land Use Budget

SCHEDULE TO BE READ IN CONJUNCTION WITH DRAWING 1719-SK18, Rev B

Item	Notes	Land Take (ha)
TOTAL GROSS AREA		9.51 ha

Non-Developable		
Informal green amenity space	Incl. publicly accessible land to be managed for ecology and informal recreation	4.47 ha
Children Play Area (Equipped and Informal)	1 x LEAP and 1 x LAP	0.36 ha
Indicative Structural Planting	Landscaped buffer along the north-western and eastern site boundaries	0.11 ha
Indicative Primary Road	Incl. carriageways, footways and soft verges	0.55 ha
Indicative Attenuation	Incl. balancing ponds and associated earth works	0.56 ha
Total Non-Developable		6.05 ha

Net Developable		
Residential Development		3.46 ha
Total Net Developable		3.46 ha

Total No. of dwellings	100
Net Density	28.9 dph



Appendix 4 Indicative Masterplan and Land Use Budget (Site ID: 645 – Willoughby Park, Great Barford)



- KEY:
-  site boundary
 -  existing bridleway
 -  existing footpath
 -  proposed footpath / cycle path
 -  indicative green/amenity space
 -  indicative children's play area
 -  indicative attenuation area
 -  indicative structural planting
 -  existing spinney
 -  potential wildlife pond
 -  potential hibernacula
 -  IDB Flood Alleviation embankment to be excluded from tree planting; access to be retained
 -  indicative primary vehicular route
 -  potential bus route
 -  residential development
 -  potential local community facilities (possible health facilities)
 -  indicative dog waste bin
 -  indicative car park

Project
Willoughby Park, Great Barford

Client
 Old Road Securities plc

Drawing Title
Willoughby Park - Illustrative Masterplan

Job No	Date	Scale
BE1719/16	14.11.2019	1:2000 @ A1
Drwg No.		Rev.
1719(16)-SK16		C

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Indicative Land Use Budget

SCHEDULE TO BE READ IN CONJUNCTION WITH DRAWING 1719-SK16, Rev C

Item	Notes	Land Take (ha)
TOTAL GROSS AREA		48.34 ha

Non-Developable		
Community Facilities	Incl. associated landscaping and parking	0.56 ha
Countryside Park and Green Amenity Space	Incl. informal green amenity space, green corridors, existing and proposed pedestrian pathways and easement along watercourse (9m each side)	31.14 ha
Children Play Area (Equipped and Informal)	Incl. 1 x MUGA, 1 x NEAP, 1 x LEAP, 1 x LAP	1.16 ha
Indicative Structural Planting	Landscaped buffer along the north-western and eastern site boundaries	0.36 ha
Indicative Primary Spine Road	Incl. carriageways, footways and soft verges, incl. a roandabout off Roxton Road	1.22 ha
Indicative Attenuation	Incl. balancing ponds and associated earth works	1.40 ha
Total Non-Developable		35.84 ha

Net Developable		
Residential Development		12.50 ha
Total Net Developable		12.50 ha

Total No. of dwellings	500
Net Density	40.0 dph



BE1719-4P
Old Road Securities Ltd
Bedford Local Plan 2040 consultation response
August 2021

Appendix 5 Bedford Local Plan 2030 Delivery Assessment



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
Various Clients

Bedford Local Plan 2030 Delivery Assessment

District Wide

**Prepared by
Strategic Planning Research Unit
DLP Planning Ltd**

September 2021



Prepared by:	Anthony Constantine / Jon Goodall MA MSc MRTPI Planner / Director
Checked by:	Jon Goodall MA MSc MRTPI Director
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3.0 Indicative Up-To-Date Supply Position at 1 April 2021.....	8
4.0 Indicative Supply at 1 April 2023	16

1.0 INTRODUCTION AND PURPOSE

- 1.1 This report reviews the housing land supply position of Bedford Borough Council and presents a high-level delivery assessment to 2030 against the Council's likely ability to sustain completion of 970dpa to 2030, emphasising gaps in the evidence base for the Local Plan 2030 and emerging Local Plan in terms of Infrastructure and Viability (notably Town Centre sites and delays to Neighbourhood Plan preparation).
- 1.2 This is to reinforce the need for flexibility irrespective of whether a stepped trajectory is adopted in the Local Plan Review. The Report concludes that there is no prospect of the Council's Preferred Options being regarded as sound without supporting the substantial prioritisation of sites for early delivery. This can only realistically be achieved under a 'hybrid' strategy supporting further growth at Key Service Centres and Rural Service Centres alongside unlocking constraints to the delivery of schemes in the urban area.

2.0 REVIEW OF THE COUNCIL'S PUBLISHED POSITION

- 2.1 The Council's most up-to-date housing land supply position is set out in the Five Year Supply of Deliverable Housing Sites, which is an update to the May 2019 report (5YSDHS 2019). This has a base date of April 2019.
- 2.2 As such this position statement is now two years out of date. At the present time, however, the Council would have to either rely on this supply as presenting the "baseline" or accept that they cannot demonstrate a five year land supply in accordance with paragraph 73 of the Framework. This of course would trigger the "tilted balance" in Paragraph 11(d) of the Framework.
- 2.3 Within the 5YSDHS it states that the Council has 5.75 years of deliverable supply with the inclusion of oversupply. Without an adjustment for oversupply, the deliverable supply of housing is 4.51 years. Using the same approach to adjust for oversupply (annualised over the remaining plan period) as endorsed in the Local Plan Inspectors' Report the published position provides for only 5.00 years' deliverable supply.
- 2.4 This is summarised in Table 1 below:

Table 1. Bedford Borough Council May 2019 Deliverable Supply Report: Oversupply Scenarios

		Actual - Excluding Oversupply	Local Plan Inspectors' Method	Oversupply - Published
	Objectively Assessed Needs (15 years)	14,550	14,550	14,550
A	Annual Requirement	970	970	970
Ai	5 Year Requirement	4850	4850	4850
	completions in 2015/16, 2016/17, 2017/18 and 2018/19	4928	4928	4928
B	Shortfall/Oversupply in Plan Period	-1048	-1048	-1048
Bi	Annual Requirement Adjusted for Oversupply	970	874.72727	760.4
	Delivery Forecast for the 5 year period			
C	Total 5 Year Dwelling Forecast	4593	4593	4593
D	5% buffer (Bi x 5) * 0.05	243	219	190
E	Five year target (5 year requirement plus 5% buffer) (Bi x 5) * 1.05	5093	4592	3992
F	Annual Target E divided by 5	1019	918	798
G	Number of years supply (deliverable supply divided by annual target) C divided by F	4.51	5.00	5.76

- 2.5 The Council's ability to demonstrate a five year supply of deliverable sites is substantially compromised fewer than two years since the adoption of the Local Plan 2030. In Appeals since the Plan was adopted the Council has acknowledged that it can only maintain a supply of deliverable sites sufficient to meet a five-year requirement that is calculated on a different basis to that set out by the Local Plan Inspectors.
- 2.6 In the most recent Appeal Decisions in the Borough Inspectors have accepted the numerous scenarios would result in a deficit against the five-year requirement (see PINS Refs: 3243154) and 3259981) while other Inspectors have recognised the uncertainty and emphasised that the five-year requirement is a minimum and it would be desirable to increase supply (PINS Ref: 3263447).
- 2.7 The deterioration in the Council's position is reinforced through concessions in its own evidence, including that presented at the Renhold Appeal (PINS Ref: 3256134). The Council has acknowledged slower-than-anticipated delivery of strategic sites on Land North of Bromham Road and at Eastcotts (RAF Cardington) removing 238 units from the published supply position ($4593 - 238 = 4355$).
- 2.8 In the more recent Appeal Decision on Land off Bedford Road, Willington (PINS Ref: 3259981) the Inspector took into account the Appellant's 'worst case' scenario of 4,191 units' deliverable supply. This resulted from further deductions to the Council's published position, including the removal of 128 units at Melbourne House, Bedford, together with adjustments already accepted by the Council ($4355 - 128 = 4227$; the remaining deductions were agreed in a Statement of Common Ground not publicly available).
- 2.9 Table 2 below summarises the implications of these subsequent findings on the Council's published position. This takes no account of any further assessment of deliverability from within the Council's published position and does not include the reduction of 36 units from the Willington Decision where these are not separately identified within the supply.

Table 2. Bedford Borough Council Housing Land Supply Taking Account of Alterations to Deliverable Supply Agreed in Recent Appeals

		Actual - Excluding Oversupply	Local Plan Inspectors' Method	Oversupply - Published
	Objectively Assessed Needs (15 years)	14,550	14,550	14,550
A	Annual Requirement	970	970	970
Ai	5 Year Requirement	4850	4850	4850
	completions in 2015/16, 2016/17, 2017/18 and 2018/19	4928	4928	4928
B	Shortfall/Oversupply in Plan Period	-1048	-1048	-1048
Bi	Annual Requirement Adjusted for Oversupply	970	874.72727	760.4
	Delivery Forecast for the 5 year period			
C	Total 5 Year Dwelling Forecast	4227	4227	4227
D	5% buffer (Bi x 5) * 0.05	243	219	190
E	Five year target (5 year requirement plus 5% buffer) (Bi x 5) * 1.05	5093	4592	3992
F	Annual Target E divided by 5	1018.5	918.46364	798
G	Number of years supply (deliverable supply divided by annual target) C divided by F	4.15	4.60	5.30
	Surplus / Deficit vs Fife Year Requirement	-866	-365	235

2.10 Under the oversupply scenario against which the Local Plan was assessed and found sound (annualised over the remaining plan period) the Council already demonstrates a deficit of -365 units against the five-year requirement. With oversupply excluded entirely a supply only slightly in excess of four years can be identified (deficit of -866 units).

3.0 INDICATIVE UP-TO-DATE SUPPLY POSITION AT 1 APRIL 2021

- 3.1 In this section we have undertaken an assessment to illustrate as far as possible the Council's up-to-date supply position (base date April 2021) based on the following:
- a) Completions recorded for 2019 – 2020 as part of the Housing Delivery Test HDT for Bedford (<https://www.gov.uk/government/publications/housing-delivery-test-2020-measurement>) this shows completions of 1,026 for the period 2019 to 2020.
 - b) Completions recorded for the 4 quarters of the period 2020 – 2021 as recorded by the Government in Live Table 253a (<https://www.gov.uk/government/publications/housing-delivery-test-2020-measurement>). It is of note that while these results will need to go through a “reconciliation process” they nevertheless provide an indication for completions in the last year. This suggests a level of completions of 970 dwellings.
 - c) Two additional years of windfall at the rate calculated in the 5YSDHS 2019 of 85 dwellings a year from 2024/25 onwards.
- 3.2 Like the 2019 baseline this calculation provides an estimate of what the Council may claim as a supply taking a relatively relaxed approach to the need for evidence and a figure based on a more critical approach to the assessment of evidence of delivery.
- 3.3 Where the Council has previously agreed concessions to the published position (as summarised in Section 2 above) these deductions have been retained in our analysis on 1 April 2021. Where relevant sites remain considered deliverable, we have applied the Council's own revised figures for accepted build rates for years 2024/25 onwards.
- 3.4 On the basis of our assessment, we have removed 389 dwellings from the Council's supply from sites identified in the published May 2019 Deliverable Sites Report.

Table 3. Estimated 2019-2026 supply from sites identified in the 2019 5YSDHS

Address	Area	Council deliverable supply 2019/20 – 2025/26	SPRU deliverable supply 2019/20 – 2025/26	SPRU Adjustment	SPRU Commentary
Eastcotts, Land r/o sheds (eastern land parcel)	Bedford	225	162	-63	Reduction based on application of revised build rates of 36dpa per parcel conceded in the Renhold Appeal
Eastcotts, south eastern land parcel	Bedford	162	162	-20	Reduction based on application of revised build rates of 36dpa per parcel conceded in the Renhold Appeal
Biddenham, Land north of Bromham Road	Bedford	638	460	-178	Reduction based on agreed delay to submission of further applications for approval of Reserved Matters pursuant to Outline (affecting the period 1 April 2019 to 31 March 2024). 80dpa build rate assumption retained 2024/25 and 2025/26
Bedford Melbourne House, 3 Kingsway	Bedford	128	0	-128	Site no longer regarded as deliverable further to the findings of the Willington Appeal Decision.
Sum		1153	784	-389	

- 3.5 The analysis does not take account of any new planning permissions on major sites granted after 1 April 2019 or otherwise already included in the Council's May 2019 Deliverable Sites Report.
- 3.6 From 1 April 2021 onwards the Council's own evidence for the ability to continue to demonstrate a supply of deliverable sites in excess of the minimum five-year requirement relies heavily on capacity identified within or to be allocated in the current Local Plan 2030. For the additional years 2024/25 and 2025/26 the May 2019 Deliverable Sites Report identifies only around 800 units' forecast supply on sites with existing consent. In contrast, sites dependent on the current Local Plan are forecast to provide 1,252 units.
- 3.7 To prepare an estimate of the Council's position at 1 April 2021 we have also reviewed the evidence that the Council presented during the Examination of the current Local Plan 2030 ('Bedford Borough Local Plan 2030 Housing Trajectory May 2019 Update to SD 36'). In total, sites not included in the 1 April 2019 assessment of 'deliverable' supply were forecast to deliver 2,651 units in the period 1 April 2021 to 31 March 2026. It follows that any delays to the deliverability of these components of supply will have a critical effect on the Council's ability to maintain a rolling surplus against the annual requirement of 970dpa in the adopted Local Plan (notwithstanding that it falls substantially short of local housing need).
- 3.8 For the whole period 1 April 2019 to 31 March 2026 the reliance on Local Plan 2030 sites can be shown as follows:

Table 4. Breakdown of Local Plan Trajectory and May 2019 Deliverable Sites: 2019 to 2026

	May 2019 Deliverable Sites	Examination Document Local Trajectory Sites	SD36 Plan	Total
1 April 2019 to 31 March 2026 - Units	5390 ¹		2651	8041 ²
% of Total	67.0%		33.0%	

- 3.9 This section therefore undertakes a review of the status of sites identified in the Local Plan 2030 trajectory and whether they can each be treated as deliverable at 1 April 2021.
- 3.10 The following table sets out our assessment of the sites included in the Council's five-year forecast of deliverable supply based on the Local Plan trajectory.
- 3.11 The 'SPRU adjustment' column identifies how many dwellings we have removed from the Council's forecasted supply based on a lack of clear evidence that these sites will deliver within the next five years.
- 3.12 The final column sets out our commentary for why these sites have been removed from the Council's supply.
- 3.13 On the basis of our assessment, we have removed 2,154 dwellings from the Council's supply.

¹ Reduced to 5001 units based on deduction of -389 units from the May 2019 Deliverable Sites Report recorded in recent Appeal Decisions

² Reduced to 7652 units based on deduction of -389 units from the May 2019 Deliverable Sites Report recorded in recent Appeal Decisions; Local Plan Trajectory sites comprise 35% of forecast supply once deductions are applied

Table 5. Estimated 2019-2026 Supply from Sites Identified in the Local Plan Trajectory

Address	Area	Council deliverable supply 2019/20 – 2025/26	SPRU deliverable supply 2019/20 – 2025/26	SPRU Adjustment	SPRU Commentary
Duck Mill Lane / Bedesman Lane	Bedford	20	0	-20	No planning applications submitted or approved on site. This is a site in flood zone 2 and there is no evidence that a sequential test has been carried out. As such, this site fails the sequential test. As such the “exception test” cannot be applied and as such its allocation is contrary to the Framework. Unlikely to deliver the 20 dwellings within the 5 years.
Greyfriars	Bedford	200	105	-95	Outline application submitted for part of site area (former police HQ) with resolution to permit subject to S106. Site is allocated so has potential to deliver within the 5 years.
Ford End Road	Bedford	430	0	-430	No application submitted or approved. This is a large complex site with a number of different public and private sector ownerships and has been proposed for regeneration over many years. The site also falls within flood zones 1, 2 & 3 and to date no work has been undertaken to establish either the developable area or the mitigation works required to bring forward residential development on the site, or to safeguard ground water sources during decontamination. The site is also heavily contaminated. Therefore, unlikely to deliver any dwellings within 5 years.
Borough Hall	Bedford	130	0	-130	No application submitted or approved. It is noted that the site was proposed by One Public Estate who are not a developer, and we understand that the site remains in multiple ownerships. This site lies partially within Flood zones 2 & 3 (1.02ha in Flood zone 3a, 0.41ha in Flood zone 3b and 3.91ha in Flood zone 2 according to Sequential Test Note of September 2018) and there is no evidence that the Council have undertaken a Sequential Test to rule out any sequentially preferable sites. Therefore, unlikely to deliver any dwellings within the 5 years.
South of the River	Bedford	221	0	-221	No application submitted under 'land south of the river', This is a substantial tract of land currently owned by a range of public and private bodies. It includes a mix of active uses such as the current Danfoss employment site and is potentially heavily contaminated as well as physically constrained. Unlikely to deliver any dwellings within the 5 years

Insert Job Number

Insert Site Name

Gold Lane, Biddenham	Bedford	160	119	-41	Discharge of conditions relating to 18/00140/MAO have been submitted and approved with most recent submitted in June 2021. Reserved Matters approval for 119 dwellings (Phase 1 only) under 21/00236/MAR with clear evidence considered to be available for this part of the site only.
329 Bedford Road, Kempston	Bedford	5	0	-5	No application submitted or approved. Unlikely to deliver any dwellings within the 5 years.
Mowbray Road	Bedford	124	0	-124	No application submitted or approved. Unlikely to deliver any dwellings within the 5 years.
Lodge Hill	Bedford	84	0	-84	No application submitted or approved. Unlikely to deliver any dwellings within the 5 years.
Land r/o Bromham Road	Bedford	27	0	-27	19/01394/MAO approved for up to 60 dwellings. No evidence of firm progress with site investigations, Discharge of Conditions, or submission of reserved matters. Clear evidence of a realistic prospect of homes being delivered within 5 years has not been demonstrated therefore site removed from supply.
Graze Hill	Bedford	100	165	+65	Outline application for 165 dwellings approved on 6th November 2020 (19/00593/MAO) with most recent RM application submitted in June 2021. Firm progress considered to provide a realistic prospect of completions within the five-year period.
N/A	Bromham	350	250	-100	'Made' Neighbourhood Plan. Assumptions for development based on application of typical lead-in and build out rates (Lichfields, Start to Finish Second Edition) applied to Outline Application proposals on allocated land under 19/01904/MAO (validated September 2019 – pending determination) plus 80 units with Reserved Matters pending determination (under 20/02520/MAR pursuant to 17/0242/MAO) on a separate allocation within the Plan.
N/A	Clapham	260	70	-190	Submission version Clapham neighbourhood plan provided to Bedford Borough Council pending dates for consultation. Assumptions for development based on application of typical lead-in and build out rates (Lichfields, Start to Finish Second Edition) (up to 499 units) applied to Outline Application ref: 21/00332/EIA on land proposed for allocation within the draft Plan. The landowners of the proposed allocation have worked cooperatively throughout the course of site promotion during the Neighbourhood Plan process, with this work supporting a single application for the land proposed to meet the housing requirement under

Insert Job Number

Insert Site Name

					the emerging NP.
N/A	Great Barford	170	0	-170	Great Barford Neighbourhood Plan is in examination and is relying on 1 strategic site of 500 units, subject to substantial outstanding objections. The proposed site does not fall within part (a) or (b) of the definition of deliverable under the Framework so should be removed from the supply and lacks any clear evidence to support conclusions of its deliverability.
N/A	Sharnbrook	170	0	-170	Sharnbrook Neighbourhood Plan is in examination and is relying on 1 site of 500 units. This will not be delivered in the 5 years so should be removed from the supply. The proposed site does not fall within part (a) or (b) of the definition of deliverable under the Framework so should be removed from the supply and lacks any clear evidence to support conclusions of its deliverability.
N/A	Rural Service Centres	200	108	-92	<p>Progress with Neighbourhood Plans in Rural Service Centres reviewed as follows. A pragmatic approach has been taken to assessing deliverability taking account of the characteristics and scale of identified sites.</p> <p>18 dwellings have been approved on the Causeway allocation in Carlton in July 2017 (17/01961/MAF) with the most recent discharge of condition approved in oct 2019 (17/01961/MAF). The Harrold Neighbourhood Plan is undergoing Examination with a Council response on the 22nd of July. No site allocations are therefore deliverable and should therefore be removed from the supply. DLP are preparing a pre-app for 25 dwelling site in Milton Ernest. Will be delivered in the 5 years so should be included in the supply. Oakley Neighbourhood plan is made. DLP has undertaken a request for pre-application advice on Land East of Station Road, which should be delivered within the 5 years so should be kept in the supply. DLP is preparing a request for pre-application advice for 25 dwellings on a site allocation in the Turvey Neighbourhood Plan (Turvey). The site is likely to deliver the dwellings within the 5 year period so should be kept in the supply. Willington Neighbourhood Plan hasn't been adopted, is going through examination with a Council response on the 22nd of July. No site allocations are therefore deliverable and should therefore be removed from the supply.</p>
	SUM	2651	817	-1834	

- 3.14 Our analysis removes a total of -2,543 units from the Council's total forecast supply from the Local Plan 2030 trajectory. Of this total, the removal of -389 dwellings is derived from sites already published in the May 2019 Deliverable Sites Report and not delivering as anticipated.
- 3.15 Table 6 below shows this position excluding any adjustment for oversupply. The significant reduction required to the assessment of supply from the Local Plan 2030 trajectory results in a substantial deficit of over 1500 units against the annualised requirement of 970dpa. The Council is therefore only likely to be able to demonstrate around 3.44 years' supply at 1 April 2019.

Table 6. Bedford Borough Council Housing Land Supply Rolled Forward to 1 April 2021 (Excluding Oversupply)

Summary Tables for 1st April 2021	Excluding Oversupply	
	Starting with BBC 2019 Supply	Starting with SPRU 2019 Supply
Annual Requirement	970	970
Requirement 2015 to 2021	5,820	5,820
Completions 2015 to 2019 (5YSDHS 2019)	4,928	4,928
Completions 2019- 2020 (HDT)	1,026	1,026
Completions 2020 – 2021 (Live table 253a)	970	970
Total completions	6,924	6,924
Total Shortfall / over supply	1,104	1,104
Annual Additional to address shortfall within 5 years	-122.6666667	-122.6666667
Total Annual	847	847
Annual Requirement plus 5% buffer	890	890
5 year requirement	4,449	4,449
BBC Estimated Total Supply at 2021	8,041	5,818
SPRU changes to supply (Table 5 Local Plan Trajectory)		-1,834
SPRU changes to supply (Table 3 May 2019 Deliverable Sites)		-389
Estimated Total Supply at 2021 including windfalls including roll forward projected completions from unfinished sites and windfall at 85 dpa	8,041	5,498
Minus Completions 2019 - 2020	-1,026	-1,026
Minus Completions 2020 - 2021	-970	-970
Supply as at 1st April 2021	6,045	3,822
Years Supply	6.79	4.30
Surplus/Shortfall	1,597	-627

- 3.16 Table 6 demonstrates that where an adjustment for oversupply is applied as set out in the Inspectors' Report for the Bedford Local Plan 2030 a five year supply of deliverable sites can also not be demonstrated. The Council is able to demonstrate around 4.30 years' supply – a deficit of around 627 dwellings against the adjusted five-year requirement.

**Table 7. Bedford Borough Council Housing Land Supply Rolled Forward to 1 April 2021
 (Annualised Oversupply spread of remaining plan period)**

With LP oversupply adjustment

Summary Tables for 1st April 2021	Starting with BBC 2019 Supply	Starting with SPRU 2019 Supply
Annual Requirement	970	970
Requirement 2015 to 2021	5,820	5,820
Completions 2015 to 2019 (5YSDHS 2019)	4,928	4,928
Completions 2019- 2020 (HDT)	1,026	1,026
Completions 2020 – 2021 (Live table 253a)	970	970
Total completions	6,924	6,924
Total Shortfall / over supply	1,104	1,104
Annualised Oversupply Adjustment (remaining 9 years)	-122.7	-122.7
Total Annual	847	847
Annual Requirement plus 5% buffer	890	890
5 year requirement	4,449	4,449
BBC Estimated Total Supply at 2021	8,041	
SPRU changes to supply (table 5 Local Plan Trajectory)		-2,154
SPRU changes to supply (table 3 May 2019 Deliverable Sites)		-389
Estimated Total Supply at 2021 including windfalls including roll forward projected completions from unfinished sites and windfall at 85 dpa	8,041	5,498
Minus Completions 2019 - 2020	-1,026	-1,026
Minus Completions 2020 - 2021	-970	-970
Supply as at 1st April 2021	6,045	3,502
Years Supply	6.79	3.94
Surplus/Shortfall	1,597	-947

4.0 INDICATIVE SUPPLY AT 1 APRIL 2023

- 4.1 The Council indicates a proposed 20-year plan period (2020 to 2040) for the Local Plan Review. The Local Plan Review must meet minimum annual local housing need calculated in accordance with the standard method. Planning Practice Guidance ID: 68-031-20190722 answers the question ‘how can past shortfalls in housing completions against planned requirements be addressed’? and states:

“Where the standard method for assessing local housing need is used as the starting point in forming the planned requirement for housing, Step 2 of the Standard Method factors in past under-delivery as part of the affordability ratio, so there is no requirement to specifically address under-delivery separately when establishing the minimum annual local housing need figure. Under-delivery may need to be considered where the plan being prepared is part way through its proposed plan period, and delivery falls below the housing requirement level set out in the emerging relevant strategic policies for housing.”

- 4.2 Based on the emerging proposals the performance of delivery in the period 2020 to 2023 will be relevant to assessing the soundness of the Local Plan 2040. Performance for this period will therefore be substantially informed by the Council’s current evidence of deliverable supply against the Local Plan 2030 housing trajectory (and extant consents).
- 4.3 The Council’s Preferred Options consultation proposals also indicate that it is likely to rely on a ‘stepped trajectory’ for the plan period to 2030 (retaining an annual requirement of 970 dwellings per annum). The Preferred Options principally rely on large-scale strategic sites with limited prospects for delivery within five years from adoption (2023 to 2028). The Council’s supply for this period will therefore also substantially be informed by the Local Plan 2030 trajectory (and characteristics of sites identified in Neighbourhood Plans).
- 4.4 The evidence for sites identified in the Local Plan 2030 trajectory, as at 1 April 2021, reviewed in this Report, demonstrates that these do not achieve an early prioritisation of housing delivery. This reflects issues raised throughout the Local Plan 2030 Examination relating to constraints to viability and availability of the sites identified, particularly within the Town Centre.
- 4.5 In these circumstances the Council’s proposals to pursue a stepped trajectory are contrary to national policy and guidance. PPG ID: 68-021-20190722 answers the question ‘when is a stepped requirement appropriate for plan-making’? and sets out:

*“A stepped housing requirement may be appropriate **where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. Strategic policy-makers will need to identify the stepped requirement in strategic housing policy, and to set out evidence to support this approach, and not seek to unnecessarily delay meeting identified development needs. Stepped requirements will need to ensure that planned housing requirements are met fully within the plan period. In reviewing and revising policies, strategic policy-makers should ensure there is not continued delay in meeting identified development needs.***

Where there is evidence to support a prioritisation of sites, local authorities may wish to identify priority sites which can be delivered earlier in the plan period, such as those on brownfield land and where there is supporting infrastructure in place e.g., transport hubs. These sites will provide additional flexibility and more certainty that authorities will be able to demonstrate a sufficient supply of deliverable sites against the housing requirement.” (SPRU emphasis)

- 4.6 We make four points:

- The change in housing requirement cannot be considered significant. The Council was fully aware of these circumstances when the Local Plan 2030 was adopted with the requirement for early review. Planning for a difference in the annual requirement of around 305 dwellings per annum (LHN of 1275 vs OAN of 970) is a relatively modest change in the context of a recently adopted Local Plan that should maintain a minimum rolling supply against the OAN figure
- The Local Plan 2030 unnecessarily sought to delay meeting needs in accordance with the Government's latest policy. Pursuing a stepped trajectory simply perpetuates that problem
- The current Local Plan 2030 housing trajectory provides for no flexibility or certainty (particularly given issues with Neighbourhood Plans and Town Centre sites). The Council's Preferred Options provide no resolution to this.
- The use of a stepped trajectory will not ensure needs are met in full. There will be a substantial shortfall against the stepped requirement of 970dpa to 2030 (based on the latest information regarding supply). A reliance on large-scale strategic sites beyond 2030, for which there is a poor record of success in the Borough in terms of timescales and rates of delivery, does not provide a reasonable prospect of development in accordance with PPG ID: 68-019-20190722)

4.7 This section of the Report undertakes an initial assessment of the Council's ability to demonstrate a five year supply of deliverable sites on 1 April 2023 upon adoption of the Local Plan 2040 taking account of the circumstances above. The following assumptions are applied:

- a) The difference between the Council's latest forecast completions for 2019/20 and completions recorded in the Housing Delivery test ($1330 - 1026 = 304$) are included in the forecasted supply 2020-2028 to ensure that these are not lost
- b) The Council's evidence for forecast completions 2020 to 2028 is based on the Local Plan 2030 housing trajectory, less the difference of -389 units resulting from recent appeals (7953 dwellings)
- c) Forecast completions for the period 2020 to 2023 are compared with the calculation of LHN (1275) and the Council's proposed stepped requirement (970) to assess the likely surplus or shortfall at adoption of the Local Plan 2040
- d) SPRU's revised assessment of supply is rolled forward to include two additional years' forecast delivery (2026/27 and 2027/28) on sites that can be considered deliverable (based on current evidence) plus two additional years' windfall supply at 85 dwellings per annum.
- e) SPRU's adjustments are applied separately to the respective periods 2020 to 2023 (to assess surplus/shortfall upon adoption of the Local Plan 2040) and 2023 to 2028 (for the calculation of five year supply on adoption). SPRU's total adjustments are -3,212 dwellings, which are additional to sites deducted as a result of recent Appeals.

4.8 For the purposes of comparison, the Local Plan 2030 housing trajectory for the period 2020 to 2028 (notwithstanding that 2019/20 completions did not perform as intended) provides for 8,352 dwellings.

4.9 Table 8 below shows the outcomes of this approach against the calculation of minimum annual local housing need of 1275 dwellings per annum. The Council's own trajectory results in a shortfall of -216 dwellings on 1 April 2023, rising to -958 dwellings with SPRU's adjustments, which would need to be made up within five years of adoption.

Table 8. Bedford Borough Council Forecast Housing Land Supply Based on Local Housing Need and Local Plan 2030 Housing Trajectory on 1 April 2023

Minimum Annual LHN

Summary Tables for 1st April 2023	Starting with BBC 2019 Supply	Starting with SPRU 2019 Supply
Performance 1 April 2020 to 31 March 2023		
Annual Requirement	1275	1275
Requirement 2020-2023	3,825	3,825
Completions 2020-2023 (5YSDHS 2019)	3,305	
SPRU Changes to 2020-2023 supply		-742
Completions 2020-2023 (SPRU)		2,563
Completions - Residual vs 2019/20 forecast	304	304
Total completions	3,609	2,867
Total Shortfall / over supply	-216	-958
Annual Additional to address shortfall within 5 years	43.2	191.6
5YLS Calculation at 1 April 2023		
Total Annual Requirement 1 April 2023	1,318	1,467
5% buffer	1,384	1,540
5 year requirement	6,921	7,700
BBC Estimated Total Supply at 2023	4,648	2,770
SPRU changes to 2023-2028 supply		-1,878
Supply as at 1st April 2023	4,648	2,770
Years Supply	3.358	1.79
Surplus/Shortfall	-2,273	-4,930

- 4.10 Using the Council's own Local Plan 2030 housing trajectory there would be only 3.36 years' deliverable supply against local housing need on 1 April 2023 – a deficit of 2,273 units. This is the minimum deficit that the Council's Preferred Options should be seeking to address, which result from issues with the sources of supply it relies upon in the Local Plan 2030.
- 4.11 Applying an up-to-date assessment of deliverability to the Council's evidence for supply illustrates a desperate situation when compared against the Government's Standard Method: only 1.79 years' supply and a deficit of over -4,930 units. This reflects an utter failure to meet housing need and address the strategic priorities for the Plan Area as part of the outcomes of plan-making under the Local Plan 2030.
- 4.12 Our analysis demonstrates that the Council's proposed approach to rely on a stepped trajectory is also flawed. This will not achieve a five year supply of deliverable sites upon adoption of the Local Plan 2040 without significant support to prioritise the early delivery of additional sites. On the Council's own evidence there would be a deficit of -445 units using the stepped approach.
- 4.13 Using SPRU's up-to-date assessment of deliverability even the stepped trajectory would achieve only 2.70 years' supply (a deficit of 2,323 units against the lower stepped requirement).

Table 9. Bedford Borough Council Forecast Housing Land Supply Based on Proposed Stepped Requirement and Local Plan 2030 Housing Trajectory on 1 April 2023

Stepped

Summary Tables for 1st April 2023	Starting with BBC 2019 Supply	Starting with SPRU 2019 Supply
Annual Requirement	970	970
Requirement 2020-2023	2,910	2,910
Completions 2020-2023 (5YSDHS 2019)	3,305	
SPRU Changes to 2020-2023 supply		-742
Completions 2020-2023 (SPRU)		2,563
Completions - Residual vs 2019/20 forecast	304	304
Total completions	3,609	2,867
Total Shortfall / over supply	699	-43
Annual Additional to address shortfall within 5 years	0	8.6
5YLS Calculation at 1 April 2023		
Total Annual Requirement 1 April 2023	970	979
5% buffer	1,019	1,028
5 year requirement	5,093	5,093
BBC Estimated Total Supply at 2023	4,648	2,770
SPRU changes to 2023-2028 supply		-1,878
Supply as at 1st April 2023	4,648	2,770
Years Supply	4.56	2.70
Surplus/Shortfall	-445	-2,323



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BE1719-4P
Old Road Securities Ltd
Bedford Local Plan 2040 consultation response
August 2021

Appendix 6 Review of Draft Sustainability Appraisal Findings obo ORS Ltd.



dynamic development solutions™

For and on behalf of
Old Road Securities (ORS) Ltd

**BEDFORD LOCAL PLAN 2040 –
Review of Draft Sustainability Appraisal Findings**

**Land at Willoughby Park, Great Barford
LPA Site ID: Ref – 604 & 645**

**Prepared by
DLP Planning Ltd
Bedford**

September 2021



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1.0 INTRODUCTION AND STRUCTURE OF REPORT

- 1.1 This Report has been prepared by DLP Planning Ltd (DLP) on behalf of Old Road Securities (ORS) Ltd and should be read alongside site-specific representations submitted as part of the current consultation relating to Land at Willoughby Park, Great Barford (LPA Site ID: Refs 604 & 645)
- 1.2 This Report undertakes an assessment of the Council's current evidence in terms of the assessment of reasonable alternatives in the Council's Draft Sustainability Report (May 2021), prepared to inform the Draft Plan Strategy Options Consultation.
- 1.3 This Report provides a summary of national policy and guidance together with best practice and sets out an overview of the draft Sustainability Appraisal in accordance with. The Report considers the Council's SA Scoping exercise and identification of reasonable alternatives and undertakes review of the assessment findings regarding the effects of different strategy options, taking account of the Sustainability Appraisal Framework prepared to inform this exercise.
- 1.4 In summary, this Report identifies that the Sustainability Appraisal does not assess individual site options and thus provides no standalone basis to support the selection or rejection of potential locations for growth or the Preferred Strategy options, without appropriate modification.
- 1.5 This Report identifies that the draft Sustainability Appraisal findings robustly support the inclusion of the 'east' corridor parishes as part of Preferred **Option 2d** but in practice indicate that this is illustrative of a need for a 'hybrid' approach to provide for an appropriate strategy in accordance with national policy and guidance (NPPF2021 paragraph 35(b)). Any selected strategy option that does not include growth in the 'east' corridor parishes would be unsound and fail to comprise an appropriate strategy or genuine reasonable alternative for the purposes of the Sustainability Appraisal. This is due to soundness issues identified with the delivery of large-scale strategic growth comprising other components of the Council's Preferred Options.
- 1.6 The Report considers the assessment of effects for **Option 2d** and illustrate why these reflect the ability to promote and maximise the benefits of what is in-effect village-related growth at the Key Service Centre of Great Barford, which is very sustainably located within the A421

corridor.

1.7 The following observations are key:

- positive effects should be increased for relevant SA objectives (community infrastructure ,housing delivery etc.) where the early delivery of sites and community benefits can be achieved
- the assessment of individual sites at the next consultation stage must accurately reflect the positive effects associated with particular development benefits e.g., new green infrastructure provision at Great Barford

1.8 The conclusions of the Report provide alternative assessment findings for a 'hybrid' scenario which retains, as a key component, growth in the 'east' transport corridor at Great Barford.

2.0 NATIONAL POLICY AND GUIDANCE

- 2.1 Paragraph 32 of the NPPF2021 refers to the importance of the Sustainability Appraisal undertaken throughout preparation of the Local Plan. Opportunities for net gains across the social, environmental, and economic domains of sustainable development should be sought and significant adverse impacts avoided where possible or otherwise subject to mitigation or compensatory measures.
- 2.2 In relation to the tests of soundness, at paragraph 35 of the NPPF2021, Local Plans will be justified where they provide for an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
- 2.3 Planning Practice Guidance provides further detail on the Sustainability Appraisal process and the legal requirements that must be satisfied. In particular, PPG ID: 11-001-20190722 describes the process as:

*“an opportunity to **consider ways by which the plan can contribute to improvements in environmental, social and economic conditions**, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are appropriate given the reasonable alternatives. **It can be used to test the evidence underpinning the plan** and help to demonstrate how the tests of soundness have been met. Sustainability appraisal should be applied as an **iterative process** informing the development of the plan.”*

- 2.4 The PPG (Paragraph: 018 Reference ID: 11-018- 20140306), requires all reasonable alternatives to be assessed against the same baseline environmental, economic, and social characteristics (following paragraph 32 of the NPPF2021). Furthermore, it makes it clear that reasonable alternatives must be assessed to the same level of detail.
- 2.5 In recognising the iterative nature of the Sustainability Appraisal process PPG ID: 11-021-20140306 anticipates changes throughout the plan-making process. Modifications to the Sustainability Appraisal should be considered where appropriate and proportionate to the level of changes being made. A change is likely to be significant if it substantially alters the plan and/ or is likely to give rise to significant effects.
- 2.6 In undertaking the Sustainability Appraisal process the relevant stages are summarised at PPG ID: 11-013-20140306. Stage B, which reflects developing and refining alternatives during preparation of the Plan (at Regulation 18 Stage – the Council’s current stage) must

consider a wide range of alternatives, approaches to mitigation and potential measures for monitoring.

2.7 The approach to undertaking Stage B, at different stages of plan preparation, is critical to justifying the selected strategy.

2.8 This has been considered through the Courts in *Heard v Broadland* [2012] EWHC 344 (Admin). In particular, see paragraphs 53 to 73, where the approach to the process of SA and alternatives are considered. In summary Ouseley J in paragraph 73 states:

“...the aim of the directive, which may affect which alternatives it is reasonable to select, is more obviously met by, and it is best interpreted as requiring, an equal examination of the alternatives which it is reasonable to select for examination alongside whatever, even at the outset, may be the preferred option. It is part of the purpose of this process to test whether what may start out as preferred should still end up as preferred after a fair and public analysis of what the authority regards as reasonable alternatives...”

2.9 This approach to fully developing and assessing alternatives is necessary to demonstrate compliance with good practice guidance¹ that remains relevant to undertaking a Sustainability Appraisal. When identifying and assessing discrete options it is necessary to have regard to a hierarchy of alternatives that allow different effects to be considered.

2.10 This allows consideration of alternatives to **need/demand**, the **mode/process** of achieving the strategy, **locations** for change and predicting how the **phasing/implementation** may impact on the Sustainability Appraisal’s objectives. The strategy within the adopted Local Plan 2030 was not subject to a robust assessment of alternatives in terms of the level of development and how this should be provided for to meet a greater proportion of needs over a longer plan period. Significant issues such as the pace of development and site selection were deferred to Neighbourhood Plans. The Council’s Preferred Strategy Options are subject to similar risks in not assessing or committing to settlement-specific and site-specific opportunities to deliver village-related growth at sustainable ‘east’ corridor parishes.

2.11 The Courts have further emphasised that reasons for selecting the preferred land use allocations and the rejection of alternatives must be given and inform the justification for the Council’s site selection process. In *Save Historic Newmarket v. Forest Heath DC* [2011] (J.P.L. 1233), where the primary ground of challenge was that the Core Strategy and

¹ A Practical Guide to the Strategic Environmental Assessment Directive, ODPM (2005)

accompanying SA/SEA Environmental Report did not explain which reasonable alternatives to the proposed policies [or sites] had been considered and why they had been rejected. Collins J considered the requirement to consider alternatives in the context of an iterative plan making process (various drafts consulted upon, sifting the options, then final draft consulted upon, examined, and adopted) and held that:

- (i) *For there to be compliance with Article 5 of the SEA Directive, the public must be presented with an accurate picture of the reasonable alternatives to the proposed policies and why they were not considered to be the best option.*

The Council's draft Sustainability Appraisal does not deal at all with the assessment of alternative sites and only sets out conclusions on broad 'component of growth' and spatial strategy options that are likely to preclude the selection of specific site options that sit outside of the preferred strategy; and

- (ii) *In an iterative plan-making process, it is not necessarily inconsistent with the SEA Directive for alternatives to the proposed policies to be ruled out prior to the publication of the final draft plan, but if that does happen the environmental report accompanying the draft plan must refer to, summarise, or repeat the reasons that were given for rejecting the alternatives at the time when they were ruled out and those reasons must still remain valid.*

The reasons given by the Council to reject broad 'component of growth options' preclude the objective assessment of individual site options and will not substantiate (and are thus inadequate) reasons to reject individual site options in subsequent iterations of the Sustainability Appraisal.

3.0 OVERVIEW OF THE DRAFT SUSTAINABILITY APPRAISAL REPORT

(a) Overall Approach

- 3.1 Paragraph 1.12 of the Draft SA Report confirms that the assessment supporting the Council's 'Preferred Strategy Options' consultation considers only broad spatial options as alternatives for the distribution of growth and the total number of dwellings in broad locations.
- 3.2 More detailed location options will only be considered once the Local Plan is finalised. The implications of this are that the Council has used only part of the Sustainability Appraisal Framework, at Appendix 1, as applicable to strategy/policy options. The summary of the Scoping stage of the SA at Paragraph 3.8 reveals important issues that can only sustainably be addressed by a broad strategy and positive assessment of individual site options.
- 3.3 We do, however, consider that some issues have been understated or their potential role in maintaining sustainable patterns of development overlooked (e.g., unmet requirements for infrastructure improvements in Key Service Centres and Rural Service Centres and the benefits associated with employment, leisure, green infrastructure, and tourism uses in rural areas). The SA Framework for sites provides the basis to assess specific opportunities to address these issues in a way the SA Framework for strategy options does not. These elements of sustainable development are more closely reflected in the draft Local Plan objectives (summarised at Paragraph 5.2 of the draft SA) than is considered through the more limited SA Framework for strategy options.
- 3.4 In identifying Preferred Options ahead of applying the SA Framework for individual sites the Council is inherently taking a general approach to considering the net effects for sustainable development.
- 3.5 By taking a 'one-size fits all' approach to the levels of growth assessed as part of the general approach (particularly in terms of village-related growth) the Council is seeking to set out conclusions on Preferred Options that would allow it to exclude certain components from the strategy, however significant their potential benefits to the Plan as a whole or at the individual settlement level. This is fundamentally contrary to the legal requirements for an iterative Sustainability Appraisal process and cannot satisfy the soundness tests for a strategy that is appropriate or positively prepared.
- 3.6 These representations on the Council's Sustainability Appraisal, when read in the context of

issues with the emerging Plan as a whole, demonstrate that the Council's current position is inconsistent, and that further testing of 'hybrid' strategy options cannot be ignored even with recognition of the role of the A421-based corridor over the plan period.

(b) Options for the Amount of Growth

- 3.7 The draft SA at paragraph 7.2 addresses the requirement for the Local Plan 2040 to meet minimum annual local housing needs and provide land for in the region of 12,500 additional units to be allocated. In order to comprise genuine reasonable alternatives, it is necessary that all 12,500 units are deliverable over the plan period. This issue is not addressed in the approach to the Sustainability Appraisal and considering strategy options. The SA should also recognise that of this total at least 3,050 units are required to meet the current shortfall in need over the period 2020 to 2030 notwithstanding separate issues with delivery of sites identified in the current Local Plan 2030 or Neighbourhood Plans.
- 3.8 Any options providing only 12,500 units that do not demonstrate they are able to provide that total between 2020 and 2040 do not comprise reasonable alternatives or an appropriate strategy. This is a significant risk in all of the Preferred Options identified by the Council. None provide for more than 12,500 dwellings. These shortcomings are exacerbated given their substantial reliance on rail-related infrastructure investment at Stewartby/Kempston Hardwick and/or the delivery of New Settlements.
- 3.9 The Council has only tested alternatives to the level of residential development based on a 10% uplift to minimum annual local housing need indicated by the standard method (resulting in the need to allocate land for 15,060 homes (or just +2,560 vs. the minimum required). In our experience this level of uplift does not represent an approach genuinely seeking to provide for higher levels of need and, in reality, is within the middle of the range that the Plan should seek to provide for flexibility and contingency (particularly given the reliance on strategic sites and failure to consider a 30-year plan period).

(c) Options for Components/Strategy for Distribution of Growth – A421 Corridor

- 3.10 The Council's approach to test components of growth ahead of strategy options (summarised at Paragraph 7.8 of the draft SA) but without conclusions following individual site and settlement-level assessments fundamentally undermines the exercise of testing reasonable alternatives. The assessment does not represent a realistic or robust measure for how these

components perform in principle.

3.11 The assessment of the A421 transport corridor component is problematic as while only one set of appraisal findings for this component are included at Appendix 3 of the SA it in-fact comprises a number of separate elements which are not distinguished within the assessment, namely:

- Transport corridor – growth focused on Wixams, Stewartby and Kempston Hardwick.
- Transport corridor – south (the parishes of Wootton, Kempston Rural, Elstow, Wilstead, Shortstown, Cotton End).
- **Transport corridor – east** (the parishes of Cardington, Cople, Willington, **Great Barford**, Roxton, Wyboston and Little Barford).
- Transport corridor – growth focused on new settlements in the A421 corridor (Wyboston and/or Little Barford).

3.12 It is plain that the A421-based corridor is a ‘hybrid’ of locational characteristics that can all support contributions towards sustainable development. What the Council’s assessment does not do, however, is distinguish what proportion or specific findings for significant effects for growth in the A421-corridor result from the ability to provide for development in those parishes listed within its geography (and which cover settlements that the Council already accepts as important in the hierarchy such as Great Barford).

3.13 Without the opportunity to support growth in these locations, which is in-effect and by definition village-related growth, the significant effects of development related only to rail-based investment and new settlements would be different.

3.14 It is impossible to separately identify the reasons within the SA that would specifically provide reasons to select or reject higher levels of growth in the A421 corridor as part of strategy options because of the specific benefits from development in the relevant parishes. There are, however, indications that this is important based on the findings against relevant SA objectives in Appendix 3, for example:

Objective 2 (biodiversity): potential for habitat creation or enhancement dependent on development opportunities;

Objective 8 (landscape/townscape): The nature of this effect will to some extent depend on the quality of new buildings, however the scale of any village extensions may affect the

sense of place.

Objective 13 (community services and facilities): Although it is likely that growth in villages will include some community services and facilities, this will largely depend on the amount of development.

- 3.15 It is therefore relevant to the Council's own assessment findings that the contribution towards sustainable development from the A421 corridor are dependent on supporting the role and function of existing centres. The exact nature of positive effects will be site-specific but logically will be greatest where the capacity for growth exists and specific benefits can be provided.
- 3.16 In effect the Council is ignoring the evidence of its own settlement hierarchy and existing patterns of development at Key Service Centres and Rural Service Centres that contribute to the sustainability of growth in the A421-corridor. While the prospect of future investment and further improved transport links complement these opportunities the reality is that the existing characteristics of settlements within the corridor have been shaped by their existing connections and this contributes to their role and function.
- 3.17 There are at least three major implications of this:
- Inclusion of the 'east' and 'south' transport corridor parishes within the A421-corridor component by definition reduces the component of growth assessed as 'village-related' elsewhere in the borough (and would also, by definition, reduce the Council's perception of negative effects associated with that component)
 - The potential positive effects ascribed to village extensions in the east and south corridor parishes are not limited only to Key Service Centres and Rural Service Centres within the corridor. Similar benefits can be secured at other centres, which are acknowledged to be amongst the most sustainable locations in the borough and where growth, if supported, would nonetheless comprise a relatively minor proportion of the overall strategy.
 - There is no settlement-level or site-level assessment to demonstrate that the Council has sought to optimise the potential for growth in the 'east' and 'south' corridor parishes as part of the A421-corridor and its Preferred Options. These two elements of the A421 corridor demonstrate the fewest potential constraints to delivery (relative to new settlements and rail-based growth) and by extension have the greatest scope to offset current and future delays to the delivery of Town Centre sites. There is no rationale for the Council to indicate why levels of growth could not be higher and why, for example, in Options 2a and 2b where higher totals are included for the 'south' parishes only the 'east' parishes are excluded altogether.
- 3.18 In summary, the draft Sustainability Appraisal findings provide no basis to select any of the

Council's Preferred Options that do not include growth in the 'east' corridor parishes. Selection of a strategy option that includes growth in these parishes (**i.e., Option 2d**) is expressly supported by the approach to the assessing effects and is necessary in order to achieve an appropriate strategy.

4.0 SUSTAINABILITY APPRAISAL CHECKLIST

- 4.1 Previous best practice guidance also provides a 'Quality Assurance Checklist' for the Sustainability Appraisal process which remains useful to understand the iterative nature of plan-making. 41 elements are identified, which correspond to the stages of the flowchart and relationship with plan preparation now summarised in the PPG.
- 4.2 These representations do not seek to apply the full checklist to the current Draft Sustainability Appraisal, given that it is incomplete. We reserve the right to comment again on all areas of the checklist upon production of the Pre-Submission draft Plan and Sustainability Appraisal
- 4.3 However, those components of the checklist specifically relating to Scoping, assessing Baseline Conditions and the Prediction and Evaluation of likely effects are especially relevant to the current stage of the Preferred Options published for consultation. We note specific concerns with the following checklist items where the SA has not met the requirements of the checklist item and further work must be undertaken to meet the required standards:

Table 1: Review of Sustainability Appraisal Checklist - Relevant Issues

Issue	Comments
Scoping	
<p>8. Technical, procedural, and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.</p>	<p>Not all technical, procedural, and other difficulties are discussed, and assumptions and uncertainties are not made explicit.</p> <p>There are key pieces of evidence missing in relation to the assessment of the different levels of development being proposed for different locations.</p> <p>This particularly affects the Council's justification for a proposed stepped trajectory; the lack of infrastructure and viability evidence to support the A421-based growth (rail investment at Kempston Hardwick/Stewartby) and New Settlement components of growth; and the ability to meet minimum local housing needs in full over the plan period under approach to identifying preferred options.</p>
<p>9. Reasons are given for eliminating issues from further consideration.</p>	<p>No reasons are given with regard to the failure to consider 'hybrid' strategy options incorporating more or all components of growth, including some village-related growth.</p> <p>No reasons are given why a flexible approach towards levels of growth at individual settlements could not be adopted when testing components of growth and strategy</p>

	options. The Council has provided no reasons to reject identifying levels of growth in each component of a 'hybrid' option determined by the requirements and site-specific opportunities within individual settlements.
10. Realistic alternatives are considered for key issues, and the reasons for choosing them are documented.	<p>The draft Sustainability Appraisal has undertaken no detailed assessment of site-specific reasonable alternatives and their potential contribution towards sustainability objectives.</p> <p>Reasonable alternative sites are required to undergo the same level of analysis as the preferred option in order to establish the most suitable option.</p>
12. The sustainability effects (both adverse and beneficial) of each alternative are identified and compared.	No testing has been undertaken to reflect the potential sustainability effects of a 'hybrid' strategy. The approach in the draft Sustainability Appraisal also precludes the ability to test the effects of alternatives to a stepped trajectory and to potentially (subject to the evidence base for strategic locations for growth) either provide flexibility and contingency to levels of growth or provide a genuine alternative that would ensure minimum local housing needs <i>are</i> met within the plan period. Ensuring growth in the 'east corridor' parishes is included in the selected strategy option is consistent with these benefits of early delivery and meeting needs in full.
13. Inconsistencies between the	The draft Sustainability Appraisal makes no reference to the emerging Oxford-

alternatives and other relevant plans, programmes or policies are identified and explained.	Cambridge Arc Spatial Framework. Specifically, it makes no reference to the requirement in national policy to consider a plan period to 2050. The draft Sustainability Appraisal lacks the necessary evidence to support assumptions for delivery to 2040.
14. Reasons are given for selection or elimination of alternatives.	No reasons for given for the rejection of a 'hybrid' strategy and no reasons are given to reject the 'village-related' component of growth. The Council will be unable to substantiate or repeat these reasons (and specifically their absence) when undertaking the detailed appraisal of sites that is still required.
Baseline Information	
15. Relevant aspects of the current state of the environment and their likely evolution without the plan are described.	Relevant sustainability issues are informed by the Council's July 2020 Scoping Report. However, this will require review upon completion of key parts of the evidence base (including Settlement Hierarchy Study and Open Space Study). There is no reference to the issues and opportunities created by made/emerging Neighbourhood Plans and likely deficits in local community infrastructure and services over the extended plan period to 2040.
16. Characteristics of areas likely to be significantly affected are described, including areas wider than the physical	The draft Sustainability Appraisal report makes no reference to the Duty to Cooperate or the characteristics of committed and emerging proposals in neighbouring areas (notably Huntingdonshire and Central Bedfordshire). The Central Bedfordshire Local

<p>boundary of the plan area where it is likely to be affected by the plan where practicable.</p>	<p>Plan 2015-2035 itself requires early review together with proposing significant growth at Marston Vale. This is likely to have effects when assessing strategic-scale alternatives at Kempston Hardwick, Stewartby and New Settlements at Wyboston and/or Little Barford in terms of potential cumulative impacts and barriers to phasing/implementation.</p>
<p>17. Difficulties such as deficiencies in information or methods are explained.</p>	<p>As previously mentioned, there are key pieces of information missing to justify the outputs of the assessment of options and the level of development at various locations.</p>
<p>Prediction and Evaluation of Likely Significant Effects</p>	
<p>18. Likely significant social, environmental, and economic effects are identified, including those listed in the SEA Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage, and landscape), as relevant.</p>	<p>The likely significant environment effects of reasonable alternative options have not been correctly or accurately assessed.</p> <p>The Council has not, for example, differentiated the different elements of A421-based growth in assessing this component (i.e., rail-based growth vs settlement-level growth in the east/south corridor parishes). Furthermore, the Council has not differentiated the potential differences in effects for ‘village-related’ growth for those settlements that also fall within the east/south transport corridors.</p> <p>The conclusions on significant effects for each component of growth and strategy option</p>

	<p>are derived using a different (and narrower) set of indicators in the SA Framework (Appendix 1) than is proposed for assessing individual sites. This is an inconsistent approach and the full testing of effects for individual site options will not support the reasons given to select/reject entire components of growth in the preferred strategy options.</p>
<p>19. Both positive and negative effects are considered, and where practicable, the duration of effects (short, medium, or long-term) is addressed.</p>	<p>While positive and negative effects are given for strategy options and components of growth there is no indication on the duration of these or potential barriers to phasing/implementation. This also reflects the absence of individual site assessment and the lack of consideration of detailed mitigation options at this stage.</p> <p>An objective approach to undertaking this element of the SA cannot be provided using a ‘one-size fits all’ approach to levels of development in each component of growth and at individual settlements. Variation in these factors as part of a ‘hybrid’ strategy has scope to maximise the contribution towards sustainable development and limit any adverse effects to short-term/minor in nature.</p>

5.0 CRITICISM OF THE 'DO-NOTHING' APPROACH

5.1 Paragraphs 1.8 and 1.11 of the draft Sustainability Appraisal indicate that the Council has tested 'do nothing' approaches for the amount and distribution of growth. The Council identifies mainly negative effects with these approaches. In terms of the assessment findings at paragraph 8.7 the Council states there would be no positive effects associated with a 'do nothing' scenario in providing for the amount of growth, citing a lack of economic growth and additional housing as well as increased in-commuting (findings set out at Appendix 4). The Council contradicts this conclusion regarding the assessment findings for a 'do nothing' scenario for components of growth and strategy options.

5.2 At paragraphs 8.14 and 8.15 the appraisal states that growth to meet identified needs (i.e., minimum annual local housing need in accordance with the standard method) is assumed to occur in accordance with the National Planning Policy Framework's presumption in favour of development. The Council nonetheless identifies mainly negative effects (set out at Appendix 6) associated with the expectation of a more dispersed pattern of development.

5.3 The principal reasons why this inconsistency has arisen, and is incorrect in terms of understanding the consequences for development as part of the Council's testing of other strategy options, are as follows:

- **Housing is likely to be dispersed in rural locations, although not necessarily in or adjoining villages.** This is incorrect as the presumption only applies to sustainable development and dispersed rural locations, including those away from villages, will not meet this test.
- **The Council itself recognises that the amount of development coming forward is likely to be similar to that if there were a local plan (resulting from calculation of minimum annual local housing need using the standard method for the purposes of decision-taking).** The Council has failed to reflect, however, that plan-making should consider where higher levels of growth may be appropriate as part of its strategy options.
- **The development would be on an uncoordinated and piecemeal basis.** This is incorrect as there are as yet no infrastructure or service delivery plans that are linked to any of the Preferred Options. Further development in Key and Rural Service Centres would be expected to respond to any relevant infrastructure requirements, once known, including those elements not addressed in Neighbourhood Plans currently or recently undergoing preparation.
- **Infrastructure provision and any community benefits arising from development would not be coordinated.** This is incorrect as infrastructure provision can be planned by the relevant providers and there is no policy in the current or emerging plan that actually coordinates community benefits.

- **Development of brownfield land is unlikely to occur unless the site is particularly well located or does not require remediation.** This makes the case that unviable poorly located brown field sites will not be developed. If sites are poorly located the question is, should they be developed? If they are unviable then even an allocation will not alter this and bring them forward.
- **This also assumes that there will be the delivery of sites** however the majority of components identified in the Council's Preferred Options are subject to long development timescales. In terms of the Preferred strategy options for the Local Plan 2040 the difference between any benefits associated with plan-led approaches is likely to be moderated (or reversed) by these timescales, reliance on a stepped trajectory and potential barriers to delivery whereas 'do minimum' scenarios would offer genuine opportunities to meet the uplift in needs that is required now. The exceptions to this are components offering the benefit of early delivery, including the 'east' corridor parishes and Great Barford in-particular

5.4 Looking specifically at Objective 12 (housing) the major negative effects identified in Appendix 4 relate to a lack of development. However, at Appendix 6 only minor negative effects are identified and these rely on unsubstantiated conclusions that a more dispersed pattern of growth would provide for an inadequate housing mix and compromise the delivery of affordable housing and specialist housing for older people.

5.5 In reality the exact opposite is likely in terms of development outcomes. Development in the borough's most sustainable settlements (outside of Bedford) is more likely to secure policy-compliant levels of affordable housing contributions. This is different to known and likely viability constraints and Town Centre sites and within large-scale strategic growth locations where the delivery of affordable housing is suppressed.

5.6 Likewise, the conclusion of negative effects for specialist housing for older people is not justified. The Council has not set out any policy position on overall levels of need or whether these could be provided within the preferred strategy options (likely necessitating a 'general' policy approach to encourage provision on larger sites).

5.7 The Appendix 6 findings for other objectives are inconsistent although generally recognise the potential benefits for a proportionate scale of growth in rural areas as part of a 'do nothing' approach. These include:

- **Objective 13 (Community Services and Facilities) (Uncertain):** if development is in the form of village extensions, this option may help support existing village community facilities. This is consistent with the assessment findings for the village-

related component of growth (Appendix 4) and strategy options including village-related growth (Appendix 5 – including **Option 2d**).

- **Objective 7 (Encourage and Support Physical Activity) (Negative):** Dispersed growth is unlikely to encourage travel by non-car modes and increase travel to the urban area – we disagree with this conclusion as once again appropriate extensions could also delivery improvements to open space and recreation and provide good access to day-to-day services and facilities.
- **Objective 5 (Economic Growth) (Neutral):** Business development is likely to locate near to existing businesses and areas with good accessibility – we agree with this conclusion as some growth at Key Service Centres and Rural Service Centres would enhance local employment opportunities and in the case of the ‘east’ corridor parishes would be well-related to existing and future opportunities for economic development.
- **Objective 2 (Biodiversity) (Negative):** ‘Do nothing’ appraisal findings note minor adverse impacts should be capable of mitigation and could lead to the creation or enhancement of habitats. The appraisal finding for the ‘do nothing’ scenario is the same as for all spatial options tested in Appendix 5 (all shown potential negative effects). The appraisal fails to reflect that only appropriate greenfield sites, primarily in Key Service Centres and Rural Service Centres, are likely to offer site-specific opportunities to enhance natural assets through the provision of additional land or mitigation measures.
- **Objective 1 (Air Quality) (Negative):** Effects associated with increased number of journeys and private car movements. The conclusions relating to the adverse effects of strategy options are inconsistent with the SA Framework for sites (Appendix 1) that recognises that the accessibility of services will reduce any harmful effects.
- **Objective 15 (Sustainable Travel) (Major Negative):** The Council suggests this aspect of ‘do nothing’ strategy options perform no worse than the reasons it has given to exclude any element of village-related growth from its preferred options. We disagree. The Council also identifies positive effects for all elements of the A421-based component of growth and some negative effects for New Settlements as part of the appraisal findings for this objective. In practice the assessment fails to reflect that positive effects outside of the urban area are likely to be greatest where development can support the role and function of existing Key Service Centres

5.8 In reality, the negative effects associated with failing to provide for opportunities that contribute towards the achievement of sustainable development are likely to be more severe as part of the Council’s Preferred Options (which are heavily reliant upon large-scale strategic sites) than its own testing of a ‘do nothing’ strategy. This would enable a more flexible distribution of growth, in accordance with the presumption in favour of sustainable development, allowing site-specific benefits of development to be realised. As part of planned approaches these benefits of greater flexibility can equally be secured through the inclusion of growth in the ‘east’ corridor parishes (and particularly at Great Barford) as part of the selected strategy option.

6.0 REASONS TO TEST HIGHER LEVELS OF VILLAGE-RELATED GROWTH IN TRANSPORT CORRIDOR (EAST) PARISHES

- 6.1 Our client supports in principle the identification of the ‘east corridor’ parishes as an element of the A421-based component of growth. Great Barford represents the only Key Service Centre within this corridor. **Option 2d** of the Council’s Preferred Options is welcomed in identifying up to 750 units in this part of the corridor within the expected scale and distribution of growth.
- 6.2 Selection of the 750no. unit figure is considered to represent a positive starting point for assessing growth in the ‘east corridor’. The relevant parishes comprise two Rural Service Centres (Roxton and Willington) in addition to Great Barford. When these same parishes are modelled under the village-related growth component they are indicated to provide 570 units towards the strategy (500 in Key Service Centres and 35 per Rural Service Centre) albeit this is an arbitrary and ‘one-size fits all’ manner of assessing the expected potential for development. The Council’s own evidence base for **Option 2d** therefore recognises that higher levels of growth are appropriate in the ‘east parishes’. Logically, and we would argue specifically, this is a clear indication that Great Barford should be assessed for opportunities to provide in excess of a further 500 units.
- 6.3 In our view that figure of 750 units should not represent an artificial cap when undertaking detailed site selection. Further site-specific testing should be undertaken to determine an appropriate contribution from Great Barford towards the strategy as a whole. However, in the context of our client’s proposals for a sustainable 500-unit village extension at Willoughby Park the starting point in **Option 2d** appears a sensible one.
- 6.4 Great Barford, and in-particular our client’s Willoughby Park proposals, represent a specific opportunity to contribute towards some of the benefits associated village-related growth (e.g., village extensions, and improvements to services, facilities, and green infrastructure). Great Barford provides an in-principle advantage in securing a positive contribution towards sustainable development given its location within the A421-based corridor.
- 6.5 For the avoidance of doubt the contribution of Great Barford towards the preferred options performs well against the Council’s own Sustainability Framework.

7.0 PROPOSED APPROPRIATE STRATEGY– OPTION 2D AND A ‘HYBRID’ APPROACH

- 7.1 This Report endorses the inclusion of the ‘east’ corridor parishes as part of Preferred **Option 2d** but in practice indicates that this is illustrative of a need for a ‘hybrid’ approach to provide for an appropriate strategy in accordance with national policy and guidance (NPPF2021 paragraph 35(b)).
- 7.2 This Report concludes that any selected strategy option that **does not** include growth in the ‘east’ corridor parishes would be unsound and fail to comprise an appropriate strategy or genuine reasonable alternative for the purposes of the Sustainability Appraisal. This is due to soundness issues identified with the delivery of large-scale strategic growth comprising other components of the Council’s Preferred Options.
- 7.3 The benefits of **Option 2d** reflect the ability to promote and maximise the benefits of what is in-effect village-related growth at the Key Service Centre of Great Barford, which is very sustainably located within the A421 corridor. Growth at Key Service Centres is an approach that the Council has accepted as sustainable in the spatial strategy of the adopted LP2030, and the evidence base for the Local Plan 2040 indicates no in-principle constraint to capacity for further development at Great Barford that could not be adequately mitigated.
- 7.4 Endorsement of growth at Great Barford under **Option 2d** in the context of a ‘hybrid’ strategy recognises that there is no arbitrary distinction between ‘village-related’ growth and support for development in the ‘east’ and ‘south’ corridor parishes in terms of their capacity to contribute towards sustainable development. The benefits of ‘village-related’ development do not suddenly materialise only where Key Service Centre and Rural Service Centres are located in the A421 corridor and do not evaporate altogether outside of it.
- 7.5 To achieve the objectives of the emerging Local Plan 2040 it is necessary to support further village extensions to the settlement of Great Barford, incorporating our client’s Willoughby Park proposals, to secure contributions to sustainable development that are assessed favourably in the draft Sustainability Appraisal (including new green infrastructure, community facilities and opportunities for recreation). The potential to secure these benefits should be reflected within the Council’s conclusions on site selection and evidence base for the submission draft version of the Plan, once finalised, including the Infrastructure Delivery Plan and Settlement Hierarchy Review, which both remain awaited.

Draft Sustainability Appraisal – Suggested Appropriate Strategy Alternative

- 7.6 A 'hybrid' option would assign the 'village-related' growth component only to those settlements outside of the 'east' and 'south' corridors. Levels of development, for the purposes of an indicative distribution, have been retained at 500 units in Key Service Centres and 35 units in Rural Service Centres albeit these are arbitrary figures and should be determined on a case-by-case basis. Wixams has been excluded from the total for Key Service Centres (reflecting its inclusion in the locations for rail-based growth).
- 7.7 The only exception, taking account of this, is an increase of 215 units in the distribution to Oakley (based on its suggested reclassification as a Key Service Centre set out in representations on behalf of other clients submitted to this consultation).
- 7.8 For the A421-based components of the strategy the total distribution to the 'east' corridor parishes are retained at the figure of 750 dwellings in the Council's Preferred **Option 2d**. This marginally exceeds the Council's arbitrary figures applied for the purpose of testing Great Barford, Roxton and Willington as 'village-related' growth but would in our view represent a more realistic starting point taking account of the capacity for growth at Great Barford and in-particular our client's Willoughby Park site. There is no site-specific justification or settlement-specific justification as to why this figure should be limited to 750 dwellings.
- 7.9 In terms of the 'hybrid' strategy this could accommodate greater flexibility in terms of large-scale strategic growth included in the strategy options. We have included the Council's minimum figures for inclusion of rail-based growth at Kempston Hardwick/Stewartby and New Settlements in either the A6 or A421 corridor, which is more likely to reflect realistic timescales for development.
- 7.10 Including both components, if required (New Settlements and rail-based growth) would comfortably exceed the minimum 12,500 units required from additional allocations, with an appropriate buffer for flexibility and contingency (particularly in terms of the prospects for meeting increased needs before 2030). There is no reason higher quanta could not be included as part of an extended plan period. Equally, this could allow some settlements outside of the transport corridors to be excluded from further village-related growth. We would, however, not recommend this where Neighbourhood Plans being prepared have failed to address important strategic priorities (as at Oakley and Sharnbrook, for example).

7.11 The 'hybrid' strategy based on these components are summarised in Table 2 below:

Table 2: Illustrative Hybrid Strategy Option Including Village-Related Growth

	Component	Option 2d	% Of Total	Option 3c	% Of Total	Option 3 - Hybrid	% Of Total	Notes
	Within urban area	1500	12%	1500	12%	1500	11%	
	Adjoining urban area	1500	12%	1500	12%	1500	11%	
	Village related	0	0%	4280	35%	1890	14%	Excluding 'east' and 'south' corridor parishes and Wixams
A421-based	Growth focused on Kempston Hardwick, Stewartby & Wixams (Rail based growth)	5,500	44%	0	0%	3915	29%	Use of minimum figure from Option 2c
	Transport corridor south	750	6%	0	0%	1535	11%	
	Transport corridor east	750	6%	0	0%	750	6%	Retention of higher figure from Option 2d
	New settlements (A421 corridor)	2500	20%					
	New settlements (A6 corridor)	0	0%	4900	40%	2400	18%	Use of minimum New Settlement total
	Total	12500	100%	12180	100%	13490	100%	

7.12 We have utilised the 'hybrid' strategy to consider an assessment of effects in-line with the Council's Sustainability Appraisal framework. When the 'hybrid' strategy is compared with the standalone findings for growth components and the Council's Options **2d** and **3c**, as well as the 'do nothing' scenario, it is apparent that the potential benefits towards sustainable development are enhanced.

7.13 This is as a result of recognising that the potential negative effects the Council assigns to village-related growth are incorrect and, in any event, inaccurate because it ignores the location of some Key Service Centres and Rural Service Centres within the A421 corridor. It also recognises that some the benefits of what is in reality 'village-related' growth in the 'east' and 'south' transport corridors will be shared across settlements elsewhere in the hierarchy.

Likewise, the assessment of positive effects for strategy options including the ‘east’ transport should be increased due to the ability to provide for sustainable village extensions at Great Barford. There is therefore no reason to reject the ‘east’ corridor parishes as part of the final selected strategy option.

7.14 The results are summarised in Table 3 below:

Table 3: Assessment of Effects – ‘Hybrid’ Strategy Option and Alternatives

SA Objective	Growth Component		Spatial Options			Do Nothing
	Village-Related Growth	A421-based Growth	Option 2d	Option 3c	Hybrid	
Objective 1	Negative	Negative	Negative	Major Negative	Negative	Negative
Objective 2	Negative	Negative	Negative	Negative	Uncertain	Negative
Objective 3	Major Negative	Positive	Uncertain	Negative	Uncertain	Major Negative
Objective 4	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
Objective 5	Negative	Positive	Positive	Positive	Positive	Neutral
Objective 6	Major Negative	Major Negative	Uncertain	Uncertain	Uncertain	Major Negative
Objective 7	Negative	Uncertain	Uncertain	Uncertain	Uncertain	Negative
Objective 8	Negative	Negative	Negative	Negative	Uncertain	Negative
Objective 9	Negative	Positive	Major Positive	Positive	Positive	Negative
Objective 10	Negative	Positive	Uncertain	Uncertain	Uncertain	Negative
Objective 11	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral
Objective 12	Positive	Positive	Positive	Positive	Positive	Negative
Objective 13	Uncertain	Uncertain	Uncertain	Uncertain	Positive	Uncertain
Objective 14	Uncertain	Uncertain	Uncertain	Uncertain	Positive	Uncertain
Objective 15	Major Negative	Positive	Positive	Major Negative	Positive	Major Negative



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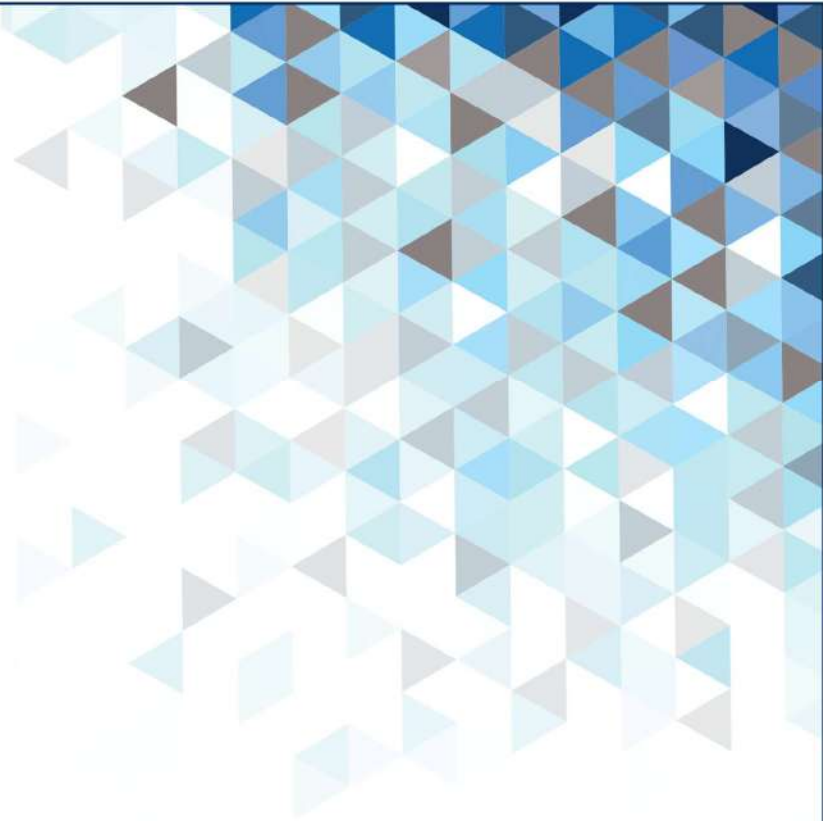
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