



Bedford Local Plan 2040 : Plan for Submission, Regulation 19 Consultation

Representations on behalf of Wates Developments Ltd

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1. EXECUTIVE SUMMARY

- 1.1 These representations have been prepared by Boyer, on behalf of Wates Developments Ltd ('Wates'). They respond to the current 'Local Plan 2040: Plan for Submission Regulation 19' ('Draft Local Plan') consultation.
- 1.2 Comments are provided in respect of the proposed Vision and Objectives, as well as a number of key policies envisaged within the Draft Local Plan. Wates supports the Plan overall as it represents an ambitious attempt to address housing and other needs, in manner that embraces principles of sustainable development.
- 1.3 Wates strongly supports the proposed allocation of 'Land South of Wixams' (alternatively known as 'Wixams End'), as set out at draft policy HOU15. Development at this site would represent a logical and well-contained extension to the Wixams New Town. Growth at this settlement will also capitalise on new planned infrastructure, notably the Wixams Rail Station (which is to be completed in 2024). It is therefore consistent with the overall spatial strategy.
- 1.4 As a largely unconstrained site, Land South of Wixams can accommodate a residential scheme of approximately 430 new homes. These will include a wide range of dwelling types and sizes, and policy-compliant levels of affordable homes. The allocation will therefore help to address identified housing needs, and at a highly sustainable and deliverable location.
- 1.5 A very significant benefit of the proposed HOU15 allocation, is that it will allow for the creation of a country park. This will include a large area of new woodland that will contribute directly to the Forest of Marston Vale project. This area of parkland will be accessible to residents of both Wixams and Wilstead, providing opportunities for recreation and wellbeing, and enriching the biodiversity of the area.
- 1.6 Whilst Wates supports the Plan as a whole, concerns are raised in respect of a number of draft policies as presently worded. Specific objections are therefore identified, alongside proposed modifications to resolve them. It is considered that the Draft Local Plan can be made 'sound' through these constructive modifications. Indeed, the suggested modifications are aimed at improving the effectiveness of Plan, rather than fundamentally challenging its strategies.
- 1.7 Accordingly, Wates commends the following representations for consideration. It is hoped that these will aid the Council in achieving a sound Local Plan.

2. INTRODUCTION

Background

- 2.1 These representations have been prepared by Boyer, in response to the current 'Local Plan 2040: Plan for Submission Regulation 19' consultation, which runs until 29 July 2022.
- 2.2 Boyer has been appointed by Wates, in respect of their ongoing promotion of Land South of Wixams¹ ('the site'). This land lies to south east of Wixams and is almost entirely situated to the west of the A6 road. A Site Location Plan is provided at **Appendix 1**.
- 2.3 At present, the site adjoins but is located outside of the defined Wixams settlement boundary². However, at Policy HOU15 ('Land South of Wixams') the Draft Local Plan proposes that the site be allocated for residential development, alongside the provision of extensive areas of green infrastructure, including a new woodland.
- 2.4 The allocation therefore envisages a sustainable extension to the Wixams New Town, which Wates fully **supports**. Wates is therefore committed to working proactively with Bedford Borough Council ('BBC'), both to bring forward a high-quality residential development and to contribute to the regeneration of the Forest of Marston Vale.
- 2.5 To confirm deliverability, a number of initial technical reports, surveys and plans have been prepared. These consider the site's constraints and opportunities and identify how development at the site could integrate with the adjoining new settlement. Respectively, these are:
- Illustrative Masterplan (**Appendix 2**);
 - Vision Document (**Appendix 3**);
 - Baseline Transport Appraisal (**Appendix 4**);
 - Historic Desk Based Assessments and Heritage Technical Notes (**Appendix 5**);
 - Ecology Technical Briefing Note and Ecological Appraisal (**Appendix 6**);
 - Phase 1 Preliminary Risk Assessment (**Appendix 7**);
 - Agricultural Land Quality Report (**Appendix 8**);
 - Acoustics Assessment (**Appendix 9**); and,
 - Preliminary Drainage Strategy (**Appendix 10**).
- 2.6 The Illustrative Masterplan and Vision Document indicate that around 430 homes and related development could be delivered at the site, alongside blue and green infrastructure, in the form of Sustainable Urban Drainage Systems (SuDS) and biodiversity and landscape enhancements. These benefits are in addition to new areas of woodland planting, which will contribute to the Community Forest project.
- 2.7 The accompanying technical reports demonstrate that the site could come forward without generating unacceptable heritage, landscape, arboricultural, ecological or flood risk impacts.

¹ The site is alternately known as Wixams End.

² The settlement lies within both the Bedford Borough and Central Bedfordshire, although the site lies wholly within the Bedford Borough.

Likewise, the appended Transport Technical Note confirms that new pedestrian and cycle connections can be successfully provided, and that a new primary point of vehicular access can be achieved from the A6 Road.

- 2.8 Accordingly, Wates supports the principle of the allocation proposed at draft Policy HOU15 and regards the site as deliverable. Nonetheless, these representations recommend that a number of changes be made to improve the effectiveness of both this policy and the Draft Local Plan in general. This will help ensure that the Plan addresses the tests of soundness, as described below.

Scope of these Representations

- 2.9 These representations comment primarily on the proposed extension of Wixams and Wates' associated interests in Land South of Wixams. However, comments are also raised in respect of other aspects of the Draft Local Plan and the associated evidence base, as relevant.
- 2.10 Our comments regarding the site are made in the context of the 'tests of soundness', as set out at paragraph 35 of the National Planning Policy Framework, 2021 ('NPPF'). These tests specify that for a Plan to be sound it must be;
- a) *“Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
 - b) *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
 - c) *Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
 - d) *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.”*

3. VISION AND OBJECTIVES

- 3.1 Wates **supports** the vision identified at pages 11 and 12 of the Draft Local Plan. The vision sets out that, by the end of the Plan-period in 2040, the Bedford Borough will be greener, more sustainable, more attractive and more prosperous, as a place to live and work. Addressing climate change and adapting to and/or mitigating its impacts, is identified as a key cross-cutting element within the overall vision.
- 3.2 In relation to the vision (and also reflected in Theme 2: 'More Accessible'), Wates note and agree that the Bedford Borough presents very significant opportunities for public transit-oriented development. The proposed vision clearly recognises this as providing an impetus for achieving genuinely sustainable growth.
- 3.3 The East West Rail project has the potential to spur local economic development and employment growth, by better integrating the Borough within a larger regional economy. This brings with it the potential to create new settlements (such as those proposed at Little Barford and Kempston Hardwick), alongside the opportunity to expand Wixams as a successful new town that will (by 2024) be served by a new train station.
- 3.4 The proposed vision (and Theme 1: 'Greener') also envisages the growth of the Forest of Marston Vale, recognising the potential for the community forest project to transform the landscape of the Borough. Wates is particularly supportive of this aspect of the vision, noting that Land South of Wixams has the potential to provide a significant contribution to the reforestation project, thereby helping to address climate change goals directly
- 3.5 In terms of the other themes and objectives identified at pages 13 to 15, it is welcome that the Draft Local Plan strives to fully address the level of housing need established through the Standard Method, with new homes to be provided through holistic 'place-making' strategies. Likewise, Wates supports the focus on improving accessibility and concentrating growth at key transport modes, and agrees that the approach will help the Borough to achieve of carbon neutrality and strategic biodiversity gains.

Compliance with the Tests of Soundness

- 3.6 For the reasons described above, the proposed vision and objectives are **consistent** with the economic, social and environmental aspects of sustainable development, as defined at NPPF paragraph 8. They also represent a **positive** and **justified** approach, as they aim to fully meet development needs (as per NPPF Section 5) and respond to the opportunities presented by future planned transport infrastructure (consistent with NPPF paragraph 73).

4. POLICY DS1 - RESOURCES AND CLIMATE CHANGE

- 4.1 Wates **supports** the principles set out at draft Policy DS1, which will facilitate the move towards carbon neutrality, in the context of the 'Climate Emergency' (declared by BBC in 2019). The Wates Group has itself committed to achieving zero carbon and zero waste, in respect of its operations, by 2025. Wates Innovation Network also undertakes research and works with SMEs to help develop new sustainable construction / building services technologies and bring these to market.
- 4.2 Part A(i) of this draft policy recognises that the most effective way to reduce carbon emissions is to concentrate development at sustainable locations, which minimise the overall need to travel and present opportunities for travel by sustainable modes. At Part A(ii) the importance of ensuring that developments are provided at a density "*that makes the most of accessible sites*" is also emphasised as a mechanism to promote self-containment and trip internalisation, as another key factor in reducing carbon emissions.
- 4.3 To this, Wates would add that higher levels of density are essential to creating the 'critical mass' necessary to sustain local schools, shops and other forms of infrastructure, which create walkable and self-contained communities. Low and zero carbon developments are also often comparatively dense, as this can assist in implementing thermally efficient designs (e.g., through a reduction in external elevations) and may facilitate community renewable energy generation strategies, district heating schemes, etc³. As we note in our comments on draft Policies DS2 and DS15, the Plan should not shy away from seeking higher densities at appropriate locations.
- 4.4 It is welcomed that the draft policy also recognises the potential for carbon sequestration to be achieved through the provision and/or restoration of habitats. The provision of new areas of woodland can contribute to this goal. Indeed, Wates' interests at Land South of Wixams are well-placed to accommodate a new area of woodland, which will facilitate the expansion of the Forest of Marston Vale as a key community and environmental benefit.

Compliance with the Tests of Soundness

- 4.5 Wates agrees with the proposals set out in draft Policy DS1, as these are **justified** in the context of the declared climate emergency and national priorities to achieve net zero carbon. As set out in our comments on Policies DS2, HOU12 and HOU15, the Plan expressly seeks to concentrate future growth in areas that benefit, or which will benefit, from new rail infrastructure. In seeking to direct development to locations with inherent sustainability benefits, Part A(i) of draft Policy DS1 impacts **positively** on the overall spatial strategy and **effectiveness** of the Plan.

³ Although the suitability of such strategies will depend on the particular circumstances of a development.

5. POLICY DS2 - SPATIAL STRATEGY

5.1 Wates **supports** the primary principle behind the proposed spatial strategy. This is that Bedford strives to become a net zero carbon emission Borough, situated at the heart of the Oxford – Cambridge Arc. This aspiration is reflected in a proposed strategy for growth which centres on sustainable (transport-oriented) locations, as situated within the A421 / East West Rail Corridor.

5.2 A key aspect of this approach concerns the South of Bedford Policy Area (designated under Policy HOU12). This includes the proposed new settlement at Kempston Hardwick, the expansion of Shortstown and the completion of the Wixams new settlement on the Midlands Main Line and at Gibraltar Corner. The balance of growth is then mainly to be provided within and adjoining the existing Bedford Urban Area.

5.3 It is considered that this approach accords with NPPF paragraph 11, which requires all Plans to promote sustainable patterns of development. The proposed approach also finds favour in NPPF paragraph 104(b), which indicates that opportunities from existing or proposed transport infrastructure should be realised. Indeed, paragraph 105 adds that;

“...Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”.

5.4 There are clearly opportunities to create new planned communities (of a strategic-scale) within the Bedford Borough. As evidenced by Wixams, such new towns and settlements have proved an effective strategy for meeting housing, economic and social needs, both within the Borough and across the wider region. The creation of new communities continues to be strongly supported in current national planning policies, with the NPPF (at paragraph 73) stating that;

“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).”

5.5 The overall spatial strategy generally aligns with Option 2b(i) of the Development Strategy Topic Paper (May 2022), which seeks to concentrate growth within the A421 transport corridor and rail-centric development, whilst also identifying and allocating suitable sites within and around Bedford. Noting that an option centred solely on urban-based growth (i.e., at Bedford) would fail to meet housing needs or would require unacceptable / unrealistic densities, the A421 transport corridor (with rail-based growth) clearly emerges as the most sustainable and suitable option when compared to the alternatives identified.

5.6 At paragraph 5.16, the document is clear that the approach to the South of Bedford Policy Area will be to maximise the benefits of rail-based growth, with higher density development achieved close to rail stations. This is indeed consistent with the NPPF, which at paragraph

125(b) indicates that Plans “*should contain policies to optimise the use of land in their area*”, adding that Plans should apply minimum density standards to seek a significant uplift in locations that are well-served by public transport.

- 5.7 The distribution of growth proposed through the Draft Local Plan is also consistent with the findings of the Sustainability Appraisal (SA). The SA sets out, at paragraphs 1.8 to 1.15, that five broad growth options were explored, with the transport corridor option being further disaggregated to test four sub-options. This process presented fourteen alternatives options which could potentially meet the identified scale of housing and economic growth.
- 5.8 The ‘Option 2’ sub-options 2b (i), 2b (ii) and 2b (iii) all performed similarly positively, with it being judged that (in addition to growth with the Bedford Urban Area) rail-centric development at Stewartby / Kempston Hardwick would give rise to the highest probability of travel by public transport, as an alternative to private car use. The variation between these sub-options is largely limited to the exact scale of growth at Stewartby / Kempston Hardwick and Wixams respectively, with this having limited effect on the SA’s evaluation.
- 5.9 It is recognised in draft Policy DS2(S) and its supporting text, that bringing forward strategic development (e.g., new settlements) requires extended lead-in times and relies on the delivery of significant new infrastructure. Indeed, East West Rail and the associated new station to serve the proposed Kempston Hardwick new settlement, are not expected to be completed before 2030. For this reason, the Draft Local Plan does not anticipate delivery until the latter part of the Plan-period
- 5.10 In this context, it is welcome that the Plan also allocates sites that can deliver new housing earlier within the Plan-period. This is necessary to comply with NPPF paragraph 60, which requires that “...*a sufficient amount and variety of land can come forward where it is needed*”, to support the Government’s ongoing objective of “*significantly boosting*” the supply of homes. Diverse sources of housing supply will also be needed if the Plan is to prove effective in sustaining a five-year housing land supply, in accordance with NPPF paragraph 74.
- 5.11 The southern expansion of Wixams (as is envisaged in draft Policy HOU15) provides one such opportunity for early delivery. Growth at this location allows for a continuation of existing development strategies and avoids the need to start anew. Clear masterplanning principles have already been established and have guided development at Wixams for many years⁴. Furthermore, existing cross-boundary governance mechanisms already exist in the form of the Wixams Joint Development Committee, which comprises Members from CBC and BBC.
- 5.12 There is now much more certainty that a new Train Station will be delivered at Wixams, with the proposals having progressed to the ‘Stage 2b’ design-stage in 2021. In January 2022, BBC selected the preferred design for the station and indicated that it intends to bring

⁴ I.e., The ‘Elstow New Settlement Planning and Development Brief’ (1999), the ‘Wixams Master Plan and Wixams Strategic Design Guide’ (2005), the ‘Wixam Villages Details Design Brief and Design Code’ (2015) and the ‘Wixam Park Masterplan Document’ (2015).

forward a planning application, to allow construction by 2024. It is then highly likely that the proposed train station will be brought forward, thereby creating the opportunity to deliver new sustainable development at Wixams in the short-term.

- 5.13 These precedents will facilitate timely delivery, which is a fact that distinguishes the proposals on Land South of Wixams from other proposals within the broader South of Bedford strategy (as per draft Policy HOU12), that may take longer to bring forward.

Compliance with the Tests of Soundness

- 5.14 Overall, Wates **supports** the proposed spatial strategy, in so far as it seeks to provide for further strategic growth through new settlements, balanced by the expansion of existing settlements, alongside a portfolio of other smaller allocations throughout the Borough. This approach is **justified** and **consistent with national planning policies**, which require Local Plans to promote sustainable patterns of development. Conversely, the inclusion of a portfolio of smaller allocations will support housing delivery throughout the Plan-period, thereby facilitating the **effectiveness** of the Plan overall.

6. POLICY DS3 - AMOUNT AND TIMING OF HOUSING GROWTH

6.1 Wates **objects** to the proposed stepped trajectory, as set out at Policy DS3. This draft policy identifies an overall housing requirement of 27,100 new dwellings, to be delivered during the Plan-period, as follows;

- 2020/21 to 2024/25 – 4,850 dwellings (970 dpa)
- 2025/26 to 2029/30 – 5,250 dwellings (1,050 dpa⁵)
- 2030/31 to 2039/40 – 17,000 (1,700 dpa)

6.2 It is then explained that the ‘five-year housing land supply’ (‘5YHLS’) position, as an ongoing calculation, will then be measured against the stepped requirement above, as applicable at the time of assessment.

Principle of the Stepped Trajectory

6.3 Wates understands why BBC argues for a stepped trajectory in the context of this Plan. The Council’s case is set out in the Draft Plan at pages 27 and 28 (and in the supporting evidence base reports), and references the Government’s specific advice relating to stepped trajectories in the Planning Practice Guidance (PPG)⁶. This indicates that:

“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.”

6.4 Certainly, Wates recognises that the Local Housing Need (LHN) figure of 1,355 dpa (as identified through the Standard Method), is approximately 40% higher than the annual requirement in the recently adopted Local Plan 2023 (970 dpa). Noting the particular circumstances of the early review, this uplift may also point to a potential justification for a stepped trajectory.

6.5 Likewise, as indicated in our comments of Policy DS2, the Draft Local Plan’s spatial strategy is partly predicated on the delivery of strategic-scale development and new rail-centric growth, which is associated with significant infrastructure dependencies. This is set out in the evidence base report ‘The Need for a Stepped Trajectory: Transport’ (AECOM 2022), which confirms that significant improvements to the A421 and A428 ‘Black Cat to Caxton Gibbet’ are required to increase network capacity. These works are not expected to commence before 2025. Similarly, East West Rail (to Cambridge) is currently identified for completion in

⁵ N.B. the Draft Local Plan policy wording identifies a figure of 4,850 for the five-year period. However, the evidence base identifies 5,250. This latter figure appears to be correct.

⁶ Paragraph: 021 Reference ID: 68-021-20190722

2030. The infrastructure requirements associated with key parts of the proposed spatial strategy do therefore lend support for a stepped trajectory.

- 6.6 However, whilst the circumstances of this Plan may justify the consideration of a stepped trajectory 'in-principle', the NPPF (at paragraphs 22, 60 and 61) is equally clear that housing needs should be met fully and without delay. Likewise, Section 5 of the NPPF places an overall emphasis on timely delivery. It is also relevant that the PPG⁷, in advising on potential stepped trajectory arrangements, also specifically stipulates 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."

- 6.7 BBC is therefore obligated to fully explore all opportunities for achieving earlier delivery, before concluding that a stepped trajectory is necessary and justified. Wates, having reviewed the trajectory presented in the evidence base document 'Stepped Trajectory Topic Paper (April 2022)' does not agree that all such opportunities have been exhausted.
- 6.8 It must also be remarked that BBC's most recent five-year housing land supply position statement ('5 Year Supply of Deliverable Housing Sites, 2021/22 – 2025/26', dated August 2021) identifies a claimed supply of 6.56 years, against an annualised requirement of 739 dwellings (with this reduced 5YHLS requirement reflecting an accrued over-provision of 1,333 dwellings). This is a relatively strong supply position.
- 6.9 Furthermore, over the 6-year period 2015/16 to 2020/21 a total of 7,153 completions were achieved in the Bedford Borough, equating to 1,192 dpa and significantly exceeding the identified 5-year requirement of 4,850 dwellings. The Borough does not therefore appear to have a track-record of poor delivery, at least in recent years.
- 6.10 Therefore, Wates **objects** to the stepped trajectory as proposed and does not consider it to be justified by the evidence at this time. Wates invites BBC to review the comments and analysis below, and consider the proposed alternative stepped trajectory presented on page 19 of these representations.

Opportunities to Facilitate Earlier Delivery

- 6.11 On review of the Draft Local Plan, there appears to be potential to facilitate earlier delivery through amendments to proposed policy requirements. In this way, timely delivery could be supported within the overall framework of the proposed vision and spatial strategy, and suite of allocations that are proposed in the Draft Plan.
- 6.12 For example, Policy HOU12 implies that no new development within the South of Bedford area can come forward until a 'strategic place making framework' has been prepared by BBC. This approach appears to represent a significant impediment to development and Wates is not clear as to why this is needed or what additional benefits will be achieved, when

⁷ Ibid.

compared to (for example) simply requiring allocations, particularly some of the clearly standalone allocations, to be supported by individual masterplans, visions or site-specific SPDs (where their size justifies this⁸). Indeed, this is the approach that is taken to most of the allocations proposed outside of South of Bedford area.

- 6.13 Regardless, and owing to very wide geographic extent of the South of Bedford policy area, it seems likely that the envisaged strategic framework will take some time to be progressed and concluded. That is a particular concern when, consistent with BBC 'Statement of Community Involvement' (2019), there will be a requirement for community and stakeholder engagement and input, which will be challenging to coordinate in a timely manner.
- 6.14 Therefore, and as we detail more fully in Section 6 of these representations, Wates consider that Policy HOU12 and its supporting text should be modified to promote a more targeted approach. Indeed, some of the proposed allocations within the South of Bedford area clearly have the potential to be developed sustainably, without any obvious need for them to refer to the invariably high-level policies and/or guidance, which might be expected to be contained within the future strategic place making framework.
- 6.15 For example, Land South of Wixams (HOU15) is not directly dependent on the provision of new strategic-scale infrastructure⁹. The allocation is also essentially proposed as a self-contained expansion to Wixams, a new settlement where the pattern of development is well-established and understood, and where there are established cross-boundary processes for considering development proposals. Likewise, the allocation proposed at Policy HOU18, the former DVSA site at Shortstown (a site which Wates has no involvement with) appears to be similarly self-contained, such that it would seem to be capable of being brought forward in timely way. Therefore, it is not clear why these allocations should be prevented from coming forward before the encompassing 'strategic place making framework' is prepared and adopted.
- 6.16 Wates and Boyer would also add that, based on our recent experience of participating in Local Plan Examinations across the country, the Inspector for the future Examination of the Bedford Local Plan 2040 is likely to require the Plan to be modified so as to clearly specify the minimum quantum of development to be achieved at each allocation. In support of this, we strongly recommend that BBC engages with all of the relevant promoters / developers and seeks to confirm the level of development expected to be brought forward and when, and (where possible) conclude statements of common ground. Wates have this information and have provided it to BBC in relation to Land South of Wixams.

⁸ As an aside, we would also remark that the Draft Local Plan envisages a very significant number of new SPDs will need to be prepared to facilitate the proposed allocations. Whilst Wates agreed SPDs are an appropriate tool where developments are genuinely strategic in nature, the Draft Plan 2040 proposes their use very liberally. As SPDs can be timely and complicated to produce, we recommend that framework masterplans or similarly proportionate mechanisms, are instead used where possible.

⁹ This is confirmed in the aforementioned report 'The Need for a Stepped Trajectory: Transport' (AECOM 2022).

Overly Cautious Trajectory

- 6.17 A further concern is that the trajectory presented in the 'Stepped Trajectory Topic Paper' (April 2022) appears to be excessively cautious in its estimations of housing delivery, across various sources of supply. This includes the allocations proposed in the Draft Local Plan, but also existing commitments and sites allocated within the Local Plan 2030.
- 6.18 Whilst Wates understands why BBC would rightly want to safeguard against over-optimism, some aspects of the identified trajectory are cautious to the extent that they understate what might reasonably be expected to be achieved. This is relevant, as the trajectory presented in this Topic Paper is cited as a key justification in support of the suggested stepped requirement.

Local Plan 2040 Proposed Allocations

- 6.19 The Draft Local Plan proposes to allocate a number of sites, from small to medium-sized sites within the existing Bedford urban area, to larger / strategic-scale planned developments. However, the trajectory generally assumes that these sites will come forward slowly and will not provide first completions until 2030/31. As noted below, Wates considers that these timelines are, in some instances, overly pessimistic.
- 6.20 The Draft Local Plan, at Policy HOU1, proposes to allocate Land at Greyfriars North for the development of around 100 (net) dwellings. This allocation essentially constitutes an extension to the wider Greyfriars and Midland Road regeneration / redevelopment strategy, as set out in Local Plan 2030 (Policy 11). Wates concurs that the successful masterplanning and delivery of urban regeneration projects can take time. However, to assume no completions before 2030/31 appears excessively cautious for a site within the urban area, where the principle of redevelopment is not in question. Certainly, the Call for Site's form (ID 1246), as completed by the site's promoter, appears to anticipate first completions much sooner (from 2024).
- 6.21 Policy HOU2 identified Land at Mayes Yard, between High Street and Silver Street Bedford, for a mixed-use development. This is expected to include around 115 dwellings. Again, whilst Wates acknowledges that schemes of this nature can take some time to bring forward, to assume no delivery before 2030/31 appears as a very cautious position. This is noting that the site has been confirmed as being available for development in the HELAA Appendix 5, (additional sites assessments).
- 6.22 Policy HO3 proposed the redevelopment of the former Camford Works and Technology House on Ampthill Road, Bedford. BBC's trajectory suggests around 530 dwellings will be achieved through this development, with first completions taking place in 2030. The 'Bedford Infrastructure Delivery Plan: The Need for a Stepped Trajectory: Transport Final Report' (AECOM, 2022), indicates that this site is not directly dependent on new strategic infrastructure provision for its delivery. There would therefore, appear be opportunities for this site to provide first completions much earlier than 2030/31. Indeed, the information

provided by the site promoter (as detailed on Call for Sites form ID 505) anticipates completions within the period 2024/25 to 2028/29.

- 6.23 Policy HOU4, proposes to allocate the Former Peacocks auction house (Newnham Street, Bedford) for approximately 40 dwellings, following the redevelopment of this existing commercial site. The trajectory assumes first completions will take place in 2026/27. Given this site lies within the urban area and is not reliant on new infrastructure, it is not clear why its redevelopment should be so delayed. Certainly, the site promoter information (set out in Call for Sites form ID 505) suggests redevelopment would commence by the end of 2023/24.
- 6.24 Policy HOU5 proposes the allocation of Land at Abbey Field, to the west of Elstow, with the trajectory expecting around 200 dwellings to be delivered at this site. The trajectory expects first completions to take place in 2030/31. However, the site is not identified (in the 'Bedford Infrastructure Delivery Plan: The Need for a Stepped Trajectory: Transport Final Report' or the Draft Local Plan) as requiring pre-requisite strategic infrastructure improvements. It is therefore not clear why this allocation is expected to come forward so slowly. Certainly, the site promoter (in ID 638) has indicated that development could start as soon as 2025.
- 6.25 Policy HOU8 identifies an allocation to the west of Policy HQ, Woburn Road and anticipates the delivery of around 100 dwellings at this site. First completions are expected in 2025/26. This is probably a reasonable assessment, noting that the site (within the urban areas) appears to be relatively unconstrained and capable of being brought forward. It is not clear then why other comparable sites are viewed more pessimistically.
- 6.26 Policies HOU6, HOU7, HOU9 and HOU10 propose the allocation of a number of small sites, within the Bedford urban area. These sites all appear to have the potential to come forward relatively more quickly than has been assumed by BBC.
- 6.27 HOU13 proposes an allocation at Gibraltar Corner, which BBC expects will deliver around 500 homes. The aforementioned AECOM Report does not indicate that the delivery of this allocation is contingent on major strategic infrastructure programmes. There would also appear to be logical potential for phasing, to facilitate early delivery. Consequently, Wates expect that completions at this site could be achieved sooner than 2027/28, as identified in BBC's trajectory.
- 6.28 Policy HOU18 proposes the allocation of Land at the former DVSA site at Shortstown, with the trajectory anticipating that approximately 150 dwellings may be provided there. BBC anticipates first completions in 2030/31. This assumption appears pessimistic, as the site does not appear to be heavily constrained. Certainly, the site has been confirmed as being available for development in the HELAA Appendix 5, (additional sites assessments).
- 6.29 As noted in our preceding remarks, Policy HOU15 proposes to allocate Land South of Wixams. This site is under Wates' control and the BBC trajectory assumes that only 300 dwellings will be achieved. However, as detailed in Section 7 of these representations, Wates consider the capacity to be significantly greater, at 430 dwellings. We also expect first completions to be achieved in 2025/26, as the site is not reliant on new strategic

infrastructure and noting that it is a comparatively modest extension to the existing settlement.

6.30 **Table 1** overleaf presents Boyer's updated assessment of the allocations proposed in the Draft Local Plan 2040.

Table 1 – Local Plan 2040 Allocations (Boyer Revised Trajectory)

Boyer Revised Trajectory (2040 Allocations)	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	Total
HOU1 Grayfriars North	0	0	0	0	0	0	0	50	50	0	0	0	0	0	0	0	0	0	0	0	100
HOU2 Mayes Yard	0	0	0	0	0	0	0	25	25	50	15	0	0	0	0	0	0	0	0	0	115
HOU3 Land at Amphill Road	0	0	0	0	0	0	0	50	50	75	75	75	75	50	50	30	0	0	0	0	530
HOU4 Former Peacocks Auction House	0	0	0	0	25	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	40
HOU5 Abbey field, west of Elstow	0	0	0	0	0	0	50	50	50	50	0	0	0	0	0	0	0	0	0	0	200
HOU6 Bedford, The Cloisters, Church Lane	0	0	0	0	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	18
HOU7 Kempston, Land at Williamson Road	0	0	0	0	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	20
HOU8 Kempston, West of Police HQ, Woburn Road	0	0	0	0	0	25	50	25	0	0	0	0	0	0	0	0	0	0	0	0	100
HOU9 Kempston, Land at Chantry Avenue	0	0	0	0	20	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	40
HOU10 Bedford, Land at Bedford Heights, Manton Lane	0	0	0	0	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15
HOU11 Land at River Valley Park	0	0	0	0	0	0	0	0	0	100	100	100	100	100	100	100	100	100	100	100	1,000
HOU13 Kempston Rural, Land at Gibraltar Corner	0	0	0	0	0	0	50	50	75	75	75	75	75	25	0	0	0	0	0	0	500
HOU14 Land at Kempston Hardwick	0	0	0	0	0	0	0	0	0	0	100	200	200	300	300	400	500	600	600	600	3,800
HOU15 Land South Wixams	0	0	0	0	0	50	150	150	50	29	0	0	0	0	0	0	0	0	0	0	429
HOU16 Land at East Wixams	0	0	0	0	0	0	0	0	0	75	100	150	150	200	200	200	200	200	200	125	1,800
HOU17 Shortstown, Land at College Farm	0	0	0	0	0	0	0	0	50	100	100	100	100	150	150	150	100	0	0	0	1,000
HOU18 Shortstown, Land at former DVSA site	0	0	0	0	0	0	50	50	50	0	0	0	0	0	0	0	0	0	0	0	150
Little Barford New Settlement	0	0	0	0	0	0	0	0	0	0	100	200	200	300	300	400	500	600	600	600	3,800
Boyer total trajectory	98					1,864					11,695										13,657
BBC total trajectory	0					983					12,545										13,528
Difference	+98					+881					-850										

Existing Commitments 'Approved Subject to S106'

- 6.31 BBC's trajectory also appears to have applied very cautious assumptions to sites that fall under the category 'Approved Subject to S106'. For example, the Former Hazlewood Foods site (Dallas Road, Bedford) now benefits from full planning permission for 341 dwellings (granted April 2021). Yet, the trajectory suggests completions at this site are not expected until 2026/27. It is not clear why the site which is prima facie deliverable (as per the NPPF definition), is instead regarded as only developable.
- 6.32 Likewise, ref. 18/03158 granted full planning permission (on 06 April 2022) for the development of Phase 2 of the Wixams Retirement Village (on Land North of The Causeway), incorporating 62 dwellings. Yet, the trajectory suggests that first completions will not be achieved until 2028/29. This appears to be overly pessimistic, given the flatted nature of the development (which is an extension to an existing built out site) and noting that commencement would have to occur before 06 April 2025 (i.e., within three years of the decision).
- 6.33 Similarly, the current planning application seeking the redevelopment of the Aspects Leisure Park, Newnham Avenue, Bedford (ref. 19/01624/MAF), appears to be well advanced and supported in principle. Therefore, and based on a review of the online application register and consultee comments, it would appear likely that planning consent will be achieved within the next few months. The 128 dwellings proposed are also flatted, which further suggests that first completions will occur before 2026/27, which is the date identified in BBC's trajectory.
- 6.34 Outline planning permission ref. 20/02155/MAO was granted on 26th August 2021, on The Beeches, High Street, Thurleigh, Bedford. The permission grants consent for 11 dwellings, with all matters reserved except for access. Whilst reserved matters still need to be submitted and conditions discharged, this appears to be a small-scale and straightforward site to deliver. This suggests that completions will take place before 2026/27, which is the timeline assumed in the BBC trajectory.
- 6.35 Noting the above, Boyer suggests the following indicative trajectory for these respective sites, in Table 2 below.

Table 2 – Sites 'Approved Subject to S106' (Boyer Revised Trajectory)

Boyer Revised Trajectory Local Plan 2030											
	2020/ 21	2021/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 08	2028/ 29	2029/ 30	2030/ 31+
Former Hazlewood Foods site (Dallas Road)	0	0	50	75	75	75	66	0	0	0	0
Phase 2 of the Wixams Retirement Village	0	0	30	32	0	0	0	0	0	0	0
Aspects Leisure Park, Newnham	0	0	0	28	50	50	0	0	0	0	0

Avenue, Bedford											
Thurleigh, The Beeches and rear of High Street	0	0	0	11	0	0	0	0	0	0	0
<i>Boyer total trajectory for these sites</i>	0	0	80	146	125	125	66	0	0	0	0
<i>BBC total trajectory for these sites</i>							89	125	155	107	66
<i>Boyer Total</i>	351					191					0
<i>BBC Total</i>	0					476					66
<i>Difference</i>	+351					-285					-66

Local Plan 2030 Allocations

- 6.36 In terms of the allocations proposed to be carried forward from the Local Plan 2030, the trajectory again appears to be excessively cautious. Wates understand that this is partly a reflection of the Plan-period for the adopted Local Plan 2030 (i.e., up to 2030) and the circumstances of the Examination into that Plan. Nonetheless, as BBC cites the trajectories for the allocations made within the 2030 Plan in support of the requirement for a stepped trajectory in the new Local Plan 2040, the assumptions for these sites must be revisited.
- 6.37 Policy 9 (P9) allocates Land at Duck Mill Land / Bedesman Lane for redevelopment, with BBC's trajectory anticipating that 20 dwellings will be delivered at this site. Noting that the site is an underutilised ground level car park, within the urban area, there would appear to be potential for this land to deliver new homes prior to 2026/27, as is assumed in the BBC assessment.
- 6.38 Policy 11 (P11) identifies Land at Greyfriars for residential and town centre development and anticipates that around 250 dwellings will be achieved. Consistent with our previous comments, it is recognised that urban regeneration projects of the nature envisaged can take time to bring forward. However, to assume that no completions within this allocation (or the expansion envisaged in Local Plan 2030 Policy HOU1) before 2030/31, appears excessively cautious.
- 6.39 An outline planning application (ref. 20/00140/MAO) was submitted in January 2020 for 105 dwellings and other uses. Whilst application has yet to be determined, it does appear (from the application consultee responses) that consent will ultimately be achieved. Reserved Matters will need to be submitted following outline approval, before development can commence. However, even noting this requirement, it seems likely that first completions will be achieved prior to 2030/31.
- 6.40 Policy 12 (P12) allocates Ford End Road for development and the trajectory anticipates that 700 homes will be delivered at this site. Wates recognises that this site will take some time to deliver new homes, noting the need for coordination between multiple landowners,

masterplanning requirements and the obligation to achieve residential development without prejudice to the operational Eagle Brewery.

- 6.41 However, there are indications of progress. A Masterplan was approved and adopted in 2018. Planning approval has also been granted for remedial works (ref. 19/02446/MAF) on the gasworks site and the main condition of relevance (condition 4 'verification report') was discharged in September 2020. It therefore seems plausible that redevelopment could now progress, allowing completions to occur prior to 2030/31, which is the date assumed in BBC's trajectory.
- 6.42 Policy 13 allocates Land at Borough Hall and Prebend Street for development, with BBC's trajectory identifying it as a source of supply for 225 homes, with first completions achieved in 2030/31. No planning application appears to have yet been progressed and Wates accept that this site wouldn't meet the NPPF definition of 'deliverable' (i.e., completions within 5 years). Nonetheless, a masterplan was adopted by BBC in June 2018 and there do not appear to be any particular circumstances which suggest completions cannot be achieved prior to 2030/31, even if development comes forward on a phased basis.
- 6.43 Policy 14 allocates Land South of the River, Bedford, with the BBC trajectory anticipating that 1,000 dwellings will be provided from 2030/31. Wates recognises that this allocation incorporates several ownerships and is split across road and rail infrastructure. Nonetheless, the Local Plan 2030 Inspector's Report at paragraphs 80 to 84 does acknowledge that some development may come forward prior to then, on a phased basis, which suggests that earlier delivery may be possible.
- 6.44 Policy 25 allocates Stewartby Brickworks, with the BBC trajectory in the Topic Paper suggesting that no completions will be achieved at this site prior to 2030/31. Wates does not dispute that the redevelopment of this large previously developed site presents challenges, and it is understood that the site's owner is seeking a new development partner.
- 6.45 However, the site does benefit from outline approval (ref. 18/03022/EIA) for 1,000 homes and related infrastructure. Likewise, it is notable that BBC's latest 'Deliverable Sites Report' (August 2021) identifies completions from 2024/25 onwards, with these completions appearing to be counted towards the claimed five-year housing land supply. Noting these factors, Wates considers that first completions could be achieved prior to 2030/31.
- 6.46 Policy 20 allocates Land at Mowbray Road and the trajectory assumes 124 dwellings will be delivered from 2026/27. Wates considers that this greenfield site, which does not appear to be reliant on significant new infrastructure, could come forward slightly sooner than anticipated by BBC.
- 6.47 Policy 21 allocates Land North of Beverley Crescent, with the BBC trajectory indicating that 150 dwellings will be delivered from 2026/27. Noting that this site is largely greenfield, adjoins an existing residential area, and does not appear to rely on significant new infrastructure for implementation. Wates therefore believes this site could come forward sooner than anticipated by BBC.
- 6.48 Policy 22 allocates Land at Lodge Hill, with BBC's trajectory suggesting that 84 dwellings will come forward from 2026/27. Wates considers that this greenfield site, which does not appear to

be reliant on significant new infrastructure, could come forward sooner than anticipated by BBC.

6.49 Policy 24 allocates Land at Grazehill, Bedford for residential development and the trajectory indicates that 163 dwellings will be delivered from 2022/23. Wates agrees with this estimate.

6.50 Taking account of the above, Table 3 (overleaf) presents Boyer's updated assessment of the allocations in the Draft Local Plan 2030 (as a source of supply).

Table 3 - Local Plan 2030 Allocations (Boyer Revised Trajectory)

Boyer Local Plan 2030 Trajectory	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	Total
P9 - Duck Mill Lane / Bedesman Lane, Bedford	0	0	0	0	0	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	20
P11 – Greyfriars, Bedford	0	0	0	0	0	0	0	50	50	50	50	50	0	0	0	0	0	0	0	0	250
P12 - Ford End Road, Bedford	0	0	0	0	0	0	0	0	50	75	75	75	75	75	75	75	75	50	0	0	700
P13 - Borough Hall and Prebend Street	0	0	0	0	0	0	0	50	50	50	50	25	0	0	0	0	0	0	0	0	225
P14 - South of the River, Bedford	0	0	0	0	0	0	0	0	50	100	100	100	100	100	100	100	125	125	0	0	1000
P19 - 329 Bedford Road, Kempston	0	0	0	0	0	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	5
P20 - Mowbray Road, Bedford	0	0	0	0	0	40	40	44	0	0	0	0	0	0	0	0	0	0	0	0	124
P21 - Beverley Crescent, Bedford	0	0	0	0	0	10	50	50	40	0	0	0	0	0	0	0	0	0	0	0	150
P22 - Lodge Hill, Bedford	0	0	0	0	0	40	44	0	0	0	0	0	0	0	0	0	0	0	0	0	84
P24 - Graze Hill, Bedford	0	0	45	45	45	28	0	0	0	0	0	0	0	0	0	0	0	0	0	0	163
P25 - Stewartby Brickworks	0	0	0	0	0	0	0	100	100	100	100	100	100	100	100	100	100	0	0	0	1000
<i>Boyer Total Trajectory</i>	135					1286					2300										3721
<i>BBC Total Trajectory</i>	135					411					3175										3721
<i>Difference</i>	0					+875					-875										

6.51 On the basis of the above assessment of these three sources of supply (the proposed Local Plan 2040 allocations, existing commitments listed under 'Approved Subject to S106' in the Topic Paper and the Local Plan 2030 allocations), we consider that the following could be delivered, as set out in Table 4 below. The table amends the overall housing supply identified by BBC, so as to reflect the adjustments made in Tables 1, 2 and 3 above.

Table 4 – Boyer Alternative Stepped Trajectory

	2020/21 – 2024/25	2025/26 – 2029/30	2030 – 2039/40
BBC total supply	5,183	5,383	17,786
BBC expected annual average completions	1036.6 (5183 / 5)	1076.6 (5,383 / 5)	1778.6 (17,786 / 10)
<i>BBC suggested stepped requirement</i>	<i>970 dpa</i> <i>(4,850)</i>	<i>1,050 dpa</i> <i>(5,250)</i>	<i>1,700 dpa</i> <i>(17,000)</i>
Boyer total supply	5,632	6,854	15,995
Boyer expected annual average completions	1126.4 (5,632 / 5)	1,370.8 (6,854 / 5)	1,599.5 (15,995 / 10)
<i>Boyer alternative stepped requirement</i>	<i>1,110 dpa</i> <i>(5,550)</i>	<i>1,310 dpa</i> <i>(6,550)</i>	<i>1,500 dpa</i> <i>(15,000)</i>

6.52 It should be noted that the total claimed supply, in both BBC and Boyer's analysis, exceeds the identified Standard Method LHN figure of 27,100 dwellings. Boyer's total identified supply (28,481) is also slightly higher than that identified by BBC (28,352). This variation occurs because we have included the additional dwellings that Wates maintain can be provided at proposed allocation HOU15 (Land South of Wixams).

6.53 It should also be noted that we have proposed an alternative stepped requirement, which equates to the total LHN figure of 27,100. The supply would therefore exceed the requirement by approximately 4.9%, which is broadly consistent with the buffer identified BBC's analysis.

Compliance with the Tests of Soundness

6.54 Overall, Wates agrees that in this instance a stepped trajectory may be justified 'in-principle', taking account of the proposed spatial strategy and infrastructure dependencies, which will lead to higher rates of housing delivery in the latter part of the Plan-period. Likewise, the uplift in the Standard Method housing requirement is significant, when compared to the recently adopted

Local Plan 2030, such that a stepped trajectory may be said to align with national planning policies as expressed in the PPG.

- 6.55 However, for the reasons outlined, Wates objects to the stepped trajectory as specifically proposed at draft Policy DS3(S). It is considered that this should be revisited and **modified**, such that it there is a greater weighting towards the earlier part of the Plan-period. This is necessary to demonstrate that the requirements of the NPPF have been addressed.
- 6.56 Wates consider that there is potential to achieve this by making revisions to draft polices, including HOU12 and HOU15 (as detailed in Section 6 and 7 of these representations), with the purpose of providing greater flexibility and removing barriers to the timely delivery of new homes. There are also instances where BBC's housing trajectory underestimates timescales for potential delivery and appears unnecessarily pessimistic.
- 6.57 Following from this, Wates / Boyer have suggested an alternative stepped trajectory in Table 4, that is considered to be achievable. This alternative trajectory is rebalanced in favour of earlier delivery (particularly in the middle of the Plan-period), whilst recognising that aspects of the proposed spatial and development strategy rely on new strategic-scale planned developments, which will invariably take some time to bring forward.
- 6.58 It is submitted that such a rebalancing would help address housing needs in the short to medium term and reduce the risk of the housing requirement not being fully met with the Plan-period.

7. POLICY HOU12 - SOUTH OF BEDFORD AREA

- 7.1 Wates **supports** the principle of proposed Policy HOU12. As indicated in our comments on draft Policy DS2, it is clear that the SA and other evidence base documents confirm the sustainability benefits of growth within the A421 transport corridor and provide strong support for a strategy of rail-centric development. Wates also agree that East West Rail presents a particular opportunity to create higher-density and walkable communities, which are less reliant on travel by private motor vehicle.
- 7.2 In this context, draft Policy HOU12 finds support in NPPF paragraph 73, which at part (a) requires the consideration of opportunities presented by existing or planned investment. Likewise, paragraph 73 part (b) requires that larger developments be of a scale that achieve the critical mass necessary sufficient to support services and employments opportunities, whilst also offering suitable connectivity to established settlements. This is indeed already occurring at Wixams, which is designated as a Key Service Centre.
- 7.3 Another justification for the overarching policy, as set out in the 'South of Bedford Topic Paper' (April 2022), is that it is necessary to provide a comprehensive approach to the ongoing renewal of Stewartby, Kempston Hardwick and Wixams. This necessitates the coordinated delivery of new infrastructure improvements to road and rail networks (as detailed previously in these representations). Such an approach aligns with the requirements of NPPF paragraphs 11(a), 20, 22 and 73 specifically, and NPPF Section 9 more broadly.
- 7.4 Draft Policy HOU12 also provides a coordinating framework to enable environmentally led regeneration, through the Forest of Marston Vale. This is necessary to provide an effective response to green / blue infrastructure constraints and opportunities in the area. For example, the watercourses and lakes within the Stewartby and Kempston Hardwick area (a legacy of historic brickmaking) have the latent potential to promote regeneration, address surface water flooding issues and promote strategic biodiversity enhancements. This is supported by NPPF Sections 14 and 15.
- 7.5 Whilst Wates supports the overarching principle of Policy HOU12, a number of points regarding the detail of the policy, as well as the supporting text and relevant evidence base document. Wates therefore **objects** to the policy as presently worded but considers that the policy can be made sound through appropriate **modifications**.

Recommended Modifications

- 7.6 At NPPF paragraph 22, it is indicated that developments of the scale and nature envisaged at Kempston Hardwick may need to be accompanied by a '30-year vision'. No such vision appears to have been provided at this stage. It may be that BBC simply does not expect the new settlement to grow substantively beyond the Plan-period, which would omit the requirement for 30-year vision (with reference to the updated PPG¹⁰). If this is the case, then this should be clearly explained in the evidence base that supports the Draft Local Plan.
- 7.7 Another point is that Garden City Principles are only passingly referred to in draft Policy HOU12. Wates recommends that the relevance of Garden City principles should be explained

¹⁰ Paragraph 083 Reference ID: 61-083-20211004

more fully within the Plan itself (perhaps summarised into a diagram), as this will assist in justifying the South of Bedford strategy and will provide clarity as to the expected format of development. Such a modification could draw upon the evidence base report 'New Settlements Assessment' (April 2022), which already explores Garden City concepts.

- 7.8 As a separate point, the Strategic Concept Plan (presented at Figure 5 of the Draft Local Plan) should be identified as an 'illustrative' plan and the supporting text should explain that it is only intended to show broad principles. This change is needed, because the GIS mapping which has informed the Concept Plan (as detailed in the aforementioned Topic Paper) is necessarily high-level. Such mapping is not a substitute for the future masterplanning work at the planning application stage, which will be informed by site-specific information and detailed technical analysis. Making this modification will clarify the scope of the Strategic Concept Plan, thereby improving the overall effectiveness of Policy HOU12 as a development management tool.
- 7.9 Furthermore, and as referred to in our earlier comments, it is important that the proposed requirements of draft Policy HOU12 do not unnecessarily delay the delivery of new homes and other forms of development. Whilst there is evidently a need for a broad vision to coordinate further growth, the policy requirement as presently worded (extract below) implies that none of the allocations within the South of Bedford policy area can come forward until such time as a strategic place making framework has been created;

"To ensure that quality will be created and maintained design guidance will be prepared, having regard to the strategic place making framework and where appropriate Garden City Principles, will be prepared in the form of development briefs, masterplans and design codes depending on the size of the individual sites and as specified in policies HOU13-18 and EMP5."

- 7.10 It is appreciated that strategic-scale developments (such as the Kempston Hardwick new settlement) cannot realistically come forward without extensive forward planning, technical assessment and infrastructure provision. However, a number of the allocations envisaged within the South of Bedford area are smaller in scale. For example, Land South of Wixams, (draft Policy HOU15) is an extension of the existing settlement, which is not identified in 'The Need for a Stepped Trajectory: Transport' report as being directly contingent on the delivery of strategic infrastructure enhancements,
- 7.11 Noting this, and with reference to our comments on draft Policy DS3, draft Policy HOU12 should be modified so as to acknowledge that Land South of Wixams (potentially alongside other comparatively smaller allocations such as HOU18 or EMP5), could come forward sooner and on a basis which is independent from the proposed South of Bedford strategic place making framework. This will also assist in demonstrating (to the Local Plan Inspector) that all opportunities to meeting housing and economic needs in the short-medium term have been explored.
- 7.12 Furthermore, at this stage, Wates do not consider that the need for the proposed strategic place making framework has been demonstrated, nor is it clear that preparing an SPD (with a masterplanning focus) across such a large geographic area is appropriate or likely to be effective. Indeed, the South of Bedford Area incorporates proposed allocations and development sites which are situated at different settlements and locations.

- 7.13 Wates' underlying concern is the preparation of such an all-encompassing SDP will take years to prepare, noting the requirement for community and stakeholder consultation, as well as the technical complexity of masterplanning for growth across such a vast area. This presents a risk to the timely delivery of the allocation, which may subsequently impede the Plan's potential to sustain a rolling five-year housing land supply
- 7.14 Noting this, it would appear to be more logical for each of the proposed allocations within this area to be supported by their own masterplan frameworks, design guides, SPDs, etc., (with the document format / requirement being proportionate to the respective scale of development). Framing masterplanning requirements / design documents at the level of the individual allocation. This will have the added benefit of allowing the promoters and developers for the respective sites to contribute their resources to the design process.
- 7.15 We there suggest the following revised / additional wording be made as follows, in order to improve the effectiveness of the policy.
- 7.16 Delete text;

~~*"The Council will prepare a strategic place making framework to guide development across the policy area which will be adopted as Supplementary Planning Document."*~~

- 7.17 Add text;

Housing, employment and mixed-use allocations within the South of Bedford Area will be being delivered in accordance with SPD and/or Masterplan and Design Code (as relevant), which will be prepared for each site. These documents will focus on matters including:

- *Landscape, natural capital and green infrastructure;*
- *Internal and external connectivity and active and low carbon travel;*
- *Environmental regeneration and remediation;*
- *Strategic master planning and place making principles;*
- *Approaches to governance and stewardship of community assets; and,*
- *Infrastructure delivery in accordance with the Council's Infrastructure Delivery Plan"*

Compliance with the Tests of Soundness

- 7.18 Wates **agrees** with the broad approach to development proposed within the South of Bedford Policy Area, and finds this to be **justified, consistent with national policy** and **positively prepared**, having regard to the evidence base and SA.
- 7.19 Nonetheless, Wates **objects** to the current wording of the policy and considers that its **effectiveness** could be improved through **modifications**. The modifications we have outlined are aimed to facilitating the timely delivery of sites, which is a matter of soundness and particularly so in the context of the proposed stepped trajectory.

8. POLICY HOU15 - LAND SOUTH OF WIXAMS

- 8.1 Wates **supports** this draft policy in principle and agrees that Land South of Wixams represents a sustainable and suitable site for growth. A residential development at this location would relate logically to the current and permitted extent of the Wixams New Town, with the site adjoining 'Village 2' to the north west.
- 8.2 In addition to adjoining the settlement, the vast majority of the site is bound by the A6 road. Whilst a small parcel within the proposed allocation lies to the east of the A6, this is only included in order to allow for the formation of a new vehicular access, via a roundabout junction. The development of the land would therefore present an opportunity to 'round off' the south eastern extent of Wixams, without significant encroachment into the open countryside.
- 8.3 To the south, the proposed allocation extends along the route to the A6, as far Wilstead. This part of the site is not promoted for residential development. Rather, it presents an opportunity to provide a new area of (publicly accessible) woodland, contributing to the broader objectives of the Forest of Marston Vale strategy and exceeding the draft Policy HOU12 objective of achieving 30% woodland coverage within the Forest of Marston Vale Area.
- 8.4 As we detailed below, the site is free from any significant constraints that would prevent a sustainable development being achieved. It is deliverable and capable of making an early contribution to the supply of land for housing.
- 8.5 However, Wates considers that the precise wording of the proposed policy requires **modification** in potentially significant ways, in order to improve the potential for early delivery, and hence the effectiveness of the policy overall. As such, Wates **objects** to the policy as presently worded.

Consideration of Constraints and Opportunities

- 8.6 Land South of Wixams currently comprises approximately 50 hectares of predominantly arable land, which is intensively farmed. Consequently, an Extended Phase 1 Habitat Survey (included in the Ecological Appraisal at **Appendix 6**) confirms that the majority of the site is of low ecological value. Habitats of interest are largely limited to boundary hedgerows and trees, and ponds. The baseline ecological value of the land is such that it will be possible to achieve the 10% biodiversity net gain sought by draft Policy DM7.
- 8.7 In terms of arboriculture, a Tree Survey has been undertaken. This confirms that no Tree Preservation Orders (TPOs) apply to the site, nor are there any areas of Ancient Woodland within or adjoining the land. A small area of mature woodland is situated in the far south of the proposed allocation. However, this is located a considerable distance from the envisaged developable area and would form part of the proposed woodland.
- 8.8 The Tree Survey has been used to inform the emerging masterplan, which will retain existing trees and hedgerows wherever possible. Development at this site would therefore be comply with adopted Local Plan 2030 Policy 39 ('Retention of Trees') which is proposed to be 'saved'. The development also has the potential to facilitate the creation of a large new woodland, greatly increasing canopy coverage. In this way, the proposals will contribute to the

requirements of draft Policies HOU12 and HOU15, as well as adopted Policy 36 'Forest of Marston Vale' (as is proposed to be saved).

- 8.9 Consistent with the requirements of draft Policy HOU15, the accompanying Historic Desk Based Assessments and Heritage Technical Note (**Appendix 5**) indicates that conventional assessments of below ground archaeology¹¹ will be required to support a future planning application at the site. The draft policy also makes reference to above ground heritage assets at Duck End and Wilstead, indicating that these will need to be preserved and (where possible) enhanced.
- 8.10 The appended details confirm that all of the heritage assets in Duck End and Wilstead are dislocated from the site by the A6 Road and other intervening built form. On this basis, the site makes no apparent contribution to the setting of any of the assets identified, with this inherently reducing the potential for detrimental impacts to occur. The site could therefore be developed in a manner consistent with adopted Local Plan Policy 41 'Historic Environment and Heritage Assets' (as proposed to be saved) and NPPF Section 16.
- 8.11 Regarding landscape, the site is not within any designations for 'valued landscapes', such as AONBs or National Parks. It does currently fall within a 'Local Gap', as identified at Policy AD42 of the 'Allocations and Designations Local Plan Policies' (2013). However, a landscape-led approach, the introduction of appropriate buffers and the proposed new woodland, means that the effectiveness of the retained gap will be maintained (in a manner consistent with draft Policy HOU15).
- 8.12 It is also the case that the northern extent of the site, where the developable area is envisaged, is less sensitive in landscape terms. This is because the localised character of this area is influenced by the A6 and the urbanised context of the Wixams New Town. These characteristics are consistent with the classification of the 'Clay Vales – North Marston Clay Vale', as identified in the conjoined Bedford Borough and Central Bedfordshire Landscape Character Assessment (January 2015). The site's development is therefore expected to accord with adopted Policy 37 ('Landscape Character'), which is proposed to be saved.
- 8.13 Noting the presence of the A6 road (and consistent with the requirements of draft Policy HOU15) an Acoustics Assessment (**Appendix 9**) has been undertaken at the site. This confirms that a future residential development can meet required standards and secure an acceptable acoustic environment, subject to the inclusion of conventional mitigation measures. The Assessment further confirms that it may be appropriate to include a buffer towards the road. However, the width of the recommended buffer (as identified through this technical assessment) is more limited than that presented on the Strategic Concept Plan at Figure 5 of the Draft Local Plan.
- 8.14 The accompanying Preliminary Drainage Strategy (**Appendix 10**) confirms that the site is generally situated within 'Flood Zone 1', which denotes a low probability of flooding from fluvial sources. A small area along the northern boundary of the site is identified as 'Flood Zone 2', with this being associated with an existing watercourse. No development is proposed within the area.

¹¹ Geophysical surveys and targeted trenching.

- 8.15 A surface water drainage strategy will support a future planning application at the site. In-situ ground investigation and infiltration testing surveys have been undertaken to inform this. These suggest that surface water run-off will need to be addressed through SuDS, in the form of conveyancing swales and detention basins. The SuDS infrastructure will be integrated into a holistic strategy for green and blue infrastructure, which will contribute to landscape enhancements and net gains in biodiversity.

The Proposed Development

- 8.16 A Vision Document accompanies these representations, which provides a comprehensive account of the development proposals envisaged at the site.
- 8.17 However, in summary, the guiding principle for the site's development will be the pursuit of a landscape-led approach. This will be achieved primarily through the distribution of land uses, with development being limited to those parts of the site which best relate to the existing extent of Wixams and which are less sensitive. Conversely, a new area of publicly accessible woodland is proposed in the more sensitive land to the south / south east.
- 8.18 A buffer is envisaged along the western part of the site, towards the A6. This will assist in preserving the amenity of future residents, whilst also providing separation from the existing dwellings at Duck End. A further green buffer is envisaged within the northern extent of the site, where the allocation adjoins the existing / permitted extent of Wixams. Following from this, development at the site will aim to create a distinct 'village', thereby pursuing an approach that is consistent with the existing pattern of development at the settlement.
- 8.19 Extensive areas of Green Infrastructure will be provided in the form of public open space, not least a large new area of woodland and country park, that will support the Marston Vale Community Forest project and which will benefit residents of both Wixams and Wilstead. Significant areas for biodiversity enhancement will be provided across the site, ensuring that net gains above 10% will be secured¹². New SuDS features will include ponds and swales, which will further contribute to landscape and biodiversity objectives.
- 8.20 In terms of vehicular access, the site is to be served by a new three arm roundabout taken from the A6 to the east. For non-motorised users, access will be delivered to the PROW network and to Bedford Road where there are opportunities to deliver either a dedicated shared footway and cycleway connection and / or a bus connection onto Bedford Road. The key principle in this regard, is to promote pedestrian / cycle connectivity into Wixams and Wixams Train Station, when this is delivered.
- 8.21 It is considered around 430 dwellings could be achieved across a net developable area of 11.5 ha, representing an average net density of 38 dph (net). Development densities will in practice vary across the site, with the development being structured around a number of distinct character areas. In this way, the proposals strike a balance between an efficient use of land, whilst also responding appropriately to the site's context.

¹² Note, a circa 30% BNG and an increase in canopy coverage exceeding 30% can both be achieved across a smaller area than that identified allocation. Therefore, at the pre-application / planning application stage, Wates will engage with BBC to determine the appropriate quantum of the woodland, relative to other forms of parkland and green infrastructure. If appropriate, it may be that some of the land is retained in agricultural use, but with improved public access, boundary treatments, biodiversity enhancements, etc.

- 8.22 The new homes will include policy-compliant levels of affordable housing, with the mix and composition of the new dwellings ranging from flats to townhouses and detached / semi-detached homes. All of the new homes built at the site will conform to national and local planning standards and building regulation requirements relating to energy efficiency and 'zero carbon ready' development.

Development Density

- 8.23 An important consideration for any development is that of density. In this respect, it appears that BBC has underestimated achievable net densities at the site. Specifically, a density of around 30 net dwellings per hectare (dph) appears to have been assumed by BBC, in the reports associated with the consultation¹³.
- 8.24 The level of density appears comparatively low when compared to the Wixams Park development, and Wixams Villages 1 and 2. This is illustrated by the analysis of built / approved density strategies within the accompanying Vision Document (at pages 36 to 37). The analysis illustrates the prevalence of densities within the ranges of up-to 35 dph, 35 to 40 dph and 40 to 50 dph, with densities even exceeding 50 dph in particular locations.
- 8.25 Localised densities therefore vary greatly across the existing settlement, as they will indeed vary across Land South of Wixams when it is developed in future, as an extension to the New Town. Indeed, Wates proposes a range of house types and sizes, in accordance with draft Policy DM3. Achieving a well-conceived design will result in natural variation, as townhouses and/or apartments might front main streets, whilst lower density detached / semi-detached properties would line secondary streets.
- 8.26 Nonetheless, average net developable densities should not be lower than 35 dph at the site. Wates maintain that this is appropriate and reasonable, as new development with this allocation will form part of Wixams, which (as a contemporary New Town) is already characterised by higher densities than might be associated with a historic or post-war settlement. Indeed, there do not appear to be any character-related constraints that would point to a need to limit expected densities to just 30 dph (net).
- 8.27 Wates consider that an average density of 38 dph could be comfortably achieved, which suggests that capacity of the site is around 430 homes. This is based on our assessment of the available developable area (11.15 ha), taking account of the proposed strategy for SuDs and infrastructure provision, and applying appropriate buffers for to account for landscape and acoustic constraints. The approach to scheme design and developable area is detailed in the appended Illustrative Masterplan, Vision Document and supporting technical reports.
- 8.28 This volume of development appears to be achievable and would be appropriate in the context of the existing pattern of settlement at Wixams. Increased densities are also consistent with the pursuit of low / zero carbon development, as set out in draft Policies DS1, DS2 and HOU12.

Recommended Modifications to Policy HOU15 and Comments on Evidence Base

- 8.29 Wates **supports** the proposal to allocate Land South of Wixams via draft Policy HOU15.

¹³ Specifically, the April 2022 Executive Committee Papers (April 2022), at page 17, and in the Stepped Trajectory Topic Paper (2022).

Nonetheless, Wates considers that a number of **modifications** are required to improve the effectiveness of the proposed policy.

8.30 As noted in our comments above and in Sections 4 and 6 of these representations, the allocations proposed within the South of Bedford Policy Area are justified (in part) because they contribute to a rail-centric strategy for growth. In this context and to comply with NPPF paragraph 73, higher densities are needed in order to maximise the opportunities presented by transport nodes and planned growth, including at Wixams New Town.

8.31 Similarly, NPPF paragraph 125 stresses the importance of using land efficiently and states that;
“Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.”

8.32 Against the backdrop of the proposed stepped trajectory, BBC will need to demonstrate (during the EiP) that appropriately high development densities will be achieved at the sites put forward for allocation. Indeed, part (a) of NPPF paragraph 125 goes so far as to say that;

“Plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate” (Boyer underline).

8.33 A key rationale for both initially developing and now expanding Wixams New Town, was to take advantage of disused MOD land, located next to a railway line where there exists the potential to introduce a new train station. The delivery of the new Wixams Train Station is more certain than ever and new homes built on Land South of Wixams will be accessible to this transport node. It is then a clear example of a site where relatively higher levels of density should be expected, as a matter of course.

8.34 As explained, Wates consider that around 430 dwellings could be accommodated the site based on an average net density of 38 dph. This quantum far exceeds the 300 dwellings indicatively identified in the Executive Committee Papers. It is understandable that BBC may wish to be conservative, so as not to overestimate sources of supply. However, the identified capacity for Land South of Wixams is significantly understated, when considering the characteristics of the site and accounting for the appended information.

8.35 Wates therefore recommends that the wording of the policy be **modified** to make specific reference to an average (minimum) net density of 38 dph. The policy should also be clear in stating that approximate 430 dwellings will be provided at the site. Indeed, identifying the capacity of this site (and other site’s proposed for allocation) would provide greater certainty of deliverability and help to confirm that robustness of the overall housing trajectory.

8.36 In addition to the above, and with reference to our comments on draft Policy HOU12, it is further recommended that Part (i) of this policy be reworded in order to remove reference to the ‘South of Bedford Strategic Framework’. Whilst Wates agree that a design code and masterplan should support a future planning application at the site, there is no apparent need

for its delivery to be contingent on the South of Bedford Strategic Framework. Instead, the policy should be revisited to require development at Land South of Wixams to be consistent with (and to expand upon) the established masterplanning principles that have informed the growth of the new town to-date¹⁴.

- 8.37 This revision will enable the delivery of new homes and infrastructure at the site sooner than might otherwise have been the case. At the same time, the policy would still put in place appropriate controls to ensure that development is brought forward on a coherent and sound basis. In turn, the allocation will contribute to the overall supply of new homes within the early part of the Plan-period, thereby addressing needs in the short to medium term. Wates is also very happy to commit to entering into a Planning Performance Agreement (PPA) with BBC, in order to facilitate early engagement and therefore delivery.

Revised / Additional Policy Wording

- 8.38 As such, we propose the specific wording of Policy HOU15, as relevant to the first few lines of the policy (and particularly limb 'i') be modified as follows;

"Policy HOU15 Land South of Wixams

"Land at south of Wixams will be developed for residential uses and open space. Key principles of development include:

i. Preparation by the applicant of a masterplan and design code to be completed prior to and submitted with any planning application ~~and to accord with the South of Bedford strategic framework~~, and to be informed by and expand upon relevant local design guidance for Wixams, and to accord with Saved Policy 29.

- 8.39 In support of this change to the policy wording, it may also be appropriate to modify the supporting text to make reference to the Wixam related design documents listed at footnote 13 below.
- 8.40 Additionally, we also recommend that the following text be added at an appropriate point within the policy wording;

"The delivery of around 430 dwellings"

Compliance with the Tests of Soundness

- 8.41 Wates **supports** draft Policy HOU15 in principle and endorses the proposal to allocate Land South of Bedford for a significant new green infrastructure and a high-quality residential development, and as an extension to Wixams. This proposal reflects the proposed spatial strategy and is **justified, consistent with national policy** and **positively prepared**, taking account of the evidence base and the SA.
- 8.42 However, Wates currently objects to the specific wording of this draft policy. It is considered that the **effectiveness** of this policy can be improved through the **modifications** described. To this end, the policy should be revised such that it makes specific reference to the capacity of

¹⁴ As articulated through the; 'Elstow New Settlement Planning and Development Brief '(1999), 'Wixams Master Plan and Wixams Strategic Design Guide' (2005), 'Wixam Villages Details Design Brief and Design Code' (2015) and 'Wixam Park Masterplan Document' (2015).

the site. On the basis that a density of 38 dph is achievable, suitable and realistic, the Policy HOU15 should be clear that around 430 dwellings should be provided.

- 8.43 Additionally, Wates consider that the **effectiveness** of this policy (and that of the Plan as whole) should be improved by removing the link between the delivery of this site and the progression of the 'South of Bedford Strategic Framework'. Future development should instead be guided by the principles established through the documents listed at footnote 13 of these representations.

9. SUMMARY AND CONCLUSIONS

- 9.1 Wates considers that the Draft Local Plan's proposed Vision and Spatial Strategy are well reasoned and supported by the evidence base. The aspiration to progress a strategy for growth that is centred on sustainable (transport-oriented) locations, has sustainability at its heart and is consistent with the NPPF. This approach is also supported by the Sustainability Appraisal, particularly when compared to the wide range of alternatives considered.
- 9.2 Within the context of the proposed spatial strategy, it is entirely consistent for further development to take place at Wixams. The settlement is already identified as a key service centre, that benefits from an expanding range of modern local services. Indeed, Wixams will soon benefit from additional strategic transport infrastructure in the form of the new Railway Station. Having been established as a new town, the settlement has continued to develop and deliver significant volumes of new housing.
- 9.3 The development proposed through Policy HOU15 'Land South of Wixams' therefore represents a logical approach to meeting housing needs, through a modest extension to the settlement. The developable area within the north of the site is well contained by the A6 road and the current extent of Wixams, whilst the southern part of the proposed allocation is capable of accommodating large new areas of public open space and woodland.
- 9.4 Contributing to the Forest of Marston Vale project, the new accessible area of woodland / country park would provide tangible benefits for residents of both Wixams and Wilstead, particularly in terms of health and outdoor recreation. The introduction of this new woodland will also dramatically increase canopy coverage in the local area, and will create widespread opportunities for biodiversity gain and (over-time) carbon sequestration. In this way, the proposed allocation addresses sustainable development, and particularly the environmental and social aspects of the NPPF paragraph 8 definition.
- 9.5 Land South of Wixams is actively promoted by Wates and consideration has been given to key design principles, including a landscape-led approach and promoting connectivity. A Vision Document accompanies these representations, which sets out the proposed strategy in more detail. This is supported by a range of technical surveys and reports, which confirm that the site is free from any technical constraints that would impede its delivery. The development will therefore make a timely contribution to the supply of market and affordable housing.
- 9.6 Whilst Wates strongly supports the principle of both Policies HOU12 and HOU15, Wates raises objections to the current wording on these policies. Subject to the modifications outlined in these representations, we believe that these policies can be made sound. Wates also objects to the wording of Policy DS3, as (on reviewing aspects of BBC's identified housing supply), there would appear to be an opportunity for greater delivery, within the early to middle part of the Plan-period. With modification, it is considered that this draft policy can be made sound.

APPENDIX 1 – SITE LOCATION PLAN

APPENDIX 2 – ILLUSTRATIVE MASTERPLAN

APPENDIX 3 – VISION DOCUMENT

APPENDIX 4 – BASELINE TRANSPORT APPRAISAL

APPENDIX 5 – HISTORIC DBA AND HERITAGE TECHNICAL NOTES

APPENDIX 6 – ECOLOGICAL APPRAISAL AND ECOLOGY TECHNICAL NOTES

APPENDIX 7 – PHASE 1 PRELIMINARY RISK ASSESSMENT

APPENDIX 8 – AGRICULTURAL LAND QUALITY REPORT

APPENDIX 9 – ACOUSTICS ASSESSMENT

APPENDIX 10 – PRELIMINARY DRAINAGE STRATEGY