



Bedford Borough Local Plan 2040

Response by Orchestra Land to Pre-Submission Local Plan Consultation
July 2022



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1.0 Introduction

- 1.1 These representations have been prepared on behalf of Orchestra Land in response to the public consultation on Bedford Borough Council's ('BBC') Pre-Submission Local Plan 2040 Consultation ('the Local Plan').
- 1.2 These representations are made having particular regard to an area of land to the north of Top End, Renhold. A Site Location Plan identifying the extent of land (hereafter referred to as 'the Site') is enclosed at Appendix 1.
- 1.3 The Site has previously been submitted to BBC as part of the Call for Sites process.
- 1.4 The response to this consultation considers the Spatial Strategy and growth south of Bedford (Policy HOU12) the key issues of housing growth; strategic locations for growth and site-specific allocations. Having regard to the submitted Plan and evidence base, the Local Plan as proposed is not sound as it is not justified or consistent with national policy.
- 1.5 This response includes further information in relation to the land at Top End, Renhold, with the enclosed plans (Appendix 2) demonstrating how the land can deliver new homes, including self-build, in a sustainable location, which would help to both meet local housing needs and deliver the aims of the Local Plan in accordance with the outlined growth strategies.
- 1.6 The site is close to the East-West Rail corridor as identified in the Local Plan 2040 key diagram and could therefore deliver homes in a location that would benefit from sustainable transport connections. The failure of the Local Plan to allocate the Site is not based on the proportionate evidence base accompanying the Local Plan and therefore means the Local Plan is not justified and thus unsound.
- 1.7 The Local Plan can be made sound by allocating the land to the north of Top End, Renhold, in accordance with the proposals set out in this submission.

2.0 Approach to Growth

Housing Needs

- 2.1 Paragraph 15 of the NPPF (2021) requires Local Plans to, inter alia, provide a framework for addressing housing needs and other economic, social, and environmental priorities.
- 2.2 Paragraph 16 states that Local Plans should be prepared with the objective of contributing to sustainable development and be prepared positively in a manner that is aspirational as well as deliverable.
- 2.3 The NPPF also requires (para 23) that the Strategic Policies of the Plan should provide a clear strategy for bringing land forward to meet objectively assessed needs in line with the presumption in favour of sustainable development (para 11), and, in doing so, allocating sufficient sites to deliver the strategic priorities of the area.
- 2.4 National Policy therefore provides a clear, positive context with a clear requirement to meet identified needs in an aspirational but deliverable fashion. Importantly, the **NPPF does not state that Plans should adopt a ‘do minimum’ approach; instead it promotes ambitious growth**, where it is carried out in a sustainable fashion.
- 2.5 Bedford Borough sits in a key location within a national area of strategic importance, being at the heart of the Oxford-Cambridge Arc (‘the Arc’). Whilst the timetable for the Local Plan does not align with that of the Arc Spatial Framework, our client supports the approach being taken by BBC of progressing the Local Plan in advance of the Arc Spatial Framework and consider it is crucial that the Plan is adopted in a timely fashion.
- 2.6 The Local Plan 2030 was adopted on the basis of an early review and was examined against the 2012 NPPF under transitional arrangements. The Local Plan 2030, therefore, whilst being relatively “young” in Local Plan terms, is quite outdated in terms of its approach to housing needs. The level of growth identified and allocated in the Local Plan was based upon historic methods for identifying housing need, and, therefore, suppresses housing need for a recently adopted Plan.
- 2.7 The Local Plan 2040 must, therefore, address this issue in addition to considering housing needs associated with the Arc.
- 2.8 The Standard Method requirement (para 4.7 of the Local Plan) meanwhile, finds the Borough’s housing need to be 1,355dpa, which the Local Plan applies across the plan period of 2020 to 2040, creating a total of 27,100 dwellings.
- 2.9 The Local Plan 2030 did not, therefore, meet the housing needs as now identified based on the Standard Method. The Inspector’s Report into the 2030 Local Plan recognised (IR para 40) that if the Standard Method had been applied in that instance, then the housing need figure of 1,280dpa would have applied.
- 2.10 The Local Plan then proposes a stepped trajectory approach to deal with housing need, with only 970 homes per annum in 2020-2025, and 1,050 between 2025-2030. There would then be a significant increase to 1,700dpa in the final 10 years of the Plan.
- 2.11 The justification for this approach is due to the over reliance upon strategic allocations which large infrastructure requirements.

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- 2.12 This is not considered a sound approach and is effectively putting all the Council’s ‘eggs in one basket’. It is not justified by the evidence and the Local Plan.
- 2.13 In particular, the Sustainability Appraisal testing of the ‘stepped approach’ is fundamentally flawed, with the justifications given for positive scores around items such as previously developed land (see SA Appendix 8 p. 113) being conjecture. The statement that the stepped approach would have a more beneficial effect on development on previously developed land is incorrect; sites which are previously developed land can come forward irrespective of the stepped approach and the SA does not identify any previously developed land south of Bedford that benefits from the new rail stations and links. Indeed, the allocations at locations such as the Wixams are not on previously developed land but greenfield land. The SA must, therefore, be re-run with a correct assessment of the stepped approach.
- 2.14 A correct assessment of the stepped approach in the SA would identify that there are risks with being reliant upon so much growth linked to strategic infrastructure outside of the control of developers and the Council. This would in turn mean that many of the benefits may not be realised, or realised later in the plan period, pushing housing delivery outside of the plan period.
- 2.15 This is particularly evident in this area, with the still awaited deliver of the Wixams rail station. That station was due to be completed in 2015 and is now timetabled for opening in 2024.
- 2.16 Instead, the Plan should take a more balanced approach, with a reduction in numbers on some of the strategic sites and the delivery of smaller strategic allocations which can come forward earlier and increase housing delivery in the period to 2030.
- 2.17 The Local Plan is not sound, as it is not justified or effective. To make the Plan sound the trajectory should be amended. Reflecting the fact that the Local Plan may not be adopted until 2023, and thus higher delivery in 2024 (compared to the Local Plan 2030), the trajectory should be as follows:
- 2020/21- 2023/24: 970dpa
- 2024/25 – 2039/40: 1,423dpa
- 2.18 Aligned with this, new allocations will be required, and a reduction in the number of dwellings on some strategic sites may be required. These matters are dealt with below.

Plan Period

- 2.19 Turning to the matter of Plan length, ██████████ contends that the Plan Period should run to 2050. A period to 2040 is only 10 years beyond the existing Local Plan and is not a sufficiently long enough extension to effect real change.
- 2.20 As the Council will be aware, strategic growth and development, along with wide scale change, takes many years to deliver. Sites take a long time to plan correctly and then commence delivery, and thus a longer Plan Period should be allowed for.
- 2.21 Furthermore, by extending to 2050, this would bring the Plan in line with others in the Arc, such as the MK2050 Vision and the Oxford 2050 Plan. Given the strategic and important role that Bedford Borough plays within the Arc, **it would represent ‘good**

planning’ and a holistic approach to align the Local Plan Period with those other areas. The next review of the Local Plan would then not need to extend the Plan Period, but instead revise housing and employment growth to reflect the latest position as relevant at that time.

3.0 Strategic Allocations

- 3.1 Our client's position is that the approach taken to allocating sites and, in particular, the quantum of development allocated on certain sites is not justified nor consistent with national policy, for the following reasons.
- 3.2 Firstly, the Local Plan does not put dwelling numbers against allocations HOU13, HOU15, HOU16 and HOU17. The Policy must be amended to do so that there is a clear understanding and expectation as to the quantum of development that the Plan is proposing in these locations.
- 3.3 Upon review of the Stepped Trajectory Topic Paper (April 2022), numbers have been proposed against these sites as follows:
- HOU13: 500
HOU15: 300
HOU16: 1800
HOU17: 1000
- 3.4 What is not evident from the evidence base or the Local Plan, is the approximate developable areas and thus whether these are realistic densities. Upon examination of the Policies for each site, and the Figures in the Local Plan which accompany each, the only way to achieve all the Policy requirements, in particular the amount of open space and green infrastructure, it would necessitate very high densities on the majority of these sites (c. 50/60+ dph).
- 3.5 There is no evidence accompanying the Local Plan which justifies this approach; the HEDNA does not identify such a high requirement for small (1-2 bedroom homes) which a high density would lead to, nor is there market evidence supporting housing demand for such a high quantum of small units in these locations.
- 3.6 This is likely to lead to future applications which either decrease the number of homes, resulting in unmet need (in terms of overall quantum and/or mix) and possibly non-delivery of key infrastructure. Alternatively, it may lead to non-delivery of green infrastructure due to pressures to deliver housing numbers.
- 3.7 The quantum for each allocation is not based on a proportionate or robust evidence base and are therefore not sound.
- 3.8 In order to make the Local Plan sound, additional allocations are therefore necessary to make up this shortfall in numbers. Doing so would have the further benefit of addressing the stepped trajectory shortcomings as set out in Section 2 of these representations.
- 3.9 The next section of these representations puts forward a case as to one such location for growth within the southern parishes, which would deliver growth in a sustainable location, close to East-West Rail and on a site which has erroneously been discounted from the site selection process.

4.0 Land to the north of Top End, Renhold

- 4.1 The land north of Top End, Renhold sits close to the centre of the settlement, some 14 minute walk from the Primary School. It is enclosed by woodland to the east, with housing to the south and west. It is identified on the drawings enclosed at Appendix 1. The land measures c.4ha and was submitted to BBC through the Call for Sites process in 2020. Enclosed at Appendix 2 is the Council's most recent assessment of the site contained in the Site Assessment Pro Formas.
- 4.2 The land has previously been put forward for a residential development, with the Council's assessment suggesting 25 homes. The site is in sole ownership and can be brought forward in different phases to reflect local housing needs. The enclosed Plans at Appendix 1 show the different approaches which can be taken to delivery of the site.
- 4.3 The Council's assessment of the site confirms it is in a sustainable location, being only 200m from the nearest bus stop and a short walk to the primary school (scoring positively in both regards).
- 4.4 Indeed, the proforma assessment does not identify any constraints to the development of the site, other than those which can be adequately mitigated against as part of any proposals.
- 4.5 The site is being promoted for residential development, which could include self-build homes. There is an identified need within the Borough for self-build homes, and a lack of specific allocations within the Plan for this. The site could provide an important contribution to meeting this identified need in accordance with national policy.
- 4.6 A full and thorough assessment of the site, carried out in accordance with the full evidence base and the proposals as put forward on behalf of the landowner, would find that the site should be allocated. The Local Plan is, therefore, unsound as it is not justified. The Local Plan should be modified to allocate the land to the north of Top End, Renhold, for housing including self-build homes. This is necessary to both respond to the evidence base, and to help contribute to the shortfall of housing that will result from the correct assessment and planning of the other south of Bedford sites, as set out in Section 3 of these representations.
- 4.7 Moreover, as a non-strategic site the land is not reliant upon larger infrastructure. It can, therefore, come forward early in the plan period and help to deliver homes within the first 5 years. This would further boost the trajectory position and the Council's housing land supply, an important benefit.
- 4.8 The Site is in a **single ownership, is available and is deliverable**, being actively promoted by the landowner. It is not reliant upon any third parties and would be capable of "consuming its own smoke" in terms of infrastructure. The Site could, therefore, be delivered early within the plan period.
- 4.9 The location both within Renhold, but a reasonable distance from Bedford, enhances the sustainability of the Site, which could deliver a widened footpath on the frontage as noted by the Council in the proforma. The homes would therefore be in an excellent location by **providing opportunities for people to live and work locally and reduce reliance upon the private car.**

Highways and Access

- 4.10 The Site proforma (site ref 431) finds that the site would likely not cause significant issues in highway terms.
- 4.11 It also highlights the proximity (200m) to the nearest bus stops, and does not raise any concerns regarding access. The site benefits from a direct frontage to Top End Road and sufficient land to create a satisfactory access, with appropriate visibility splays.

Heritage

- 4.12 Whilst there are three Grade II listed buildings near to the site, these would not be unduly harmed by development here and could be screened through an appropriately designed and landscaped scheme.
- 4.13 There is, therefore, **no reason to find that the Site should be excluded on heritage grounds**. This is in direct contrast to other allocated sites, in particular HOU13 with several heritage assets (not just buildings but features such as ridge and furrow) identified as requiring mitigation within the Policy wording.

Summary

- 4.14 The land to the north of Top End, Renhold, is being actively promoted for residential development, including self-build homes to meet identified local needs.
- 4.15 The Local Plan **evidence base finds that this location is a logical and appropriate location for development; The Site would accord with the emerging development strategy for BBC and would deliver housing in a sustainable location, as advocated in the NPPF.**
- 4.16 The land north of Top End, Renhold should therefore be allocated for residential development within the Local Plan.

Appendix 1: Site Development Options



Buffer

Full Development
4.3 acres

Linear Scheme - 2 acres

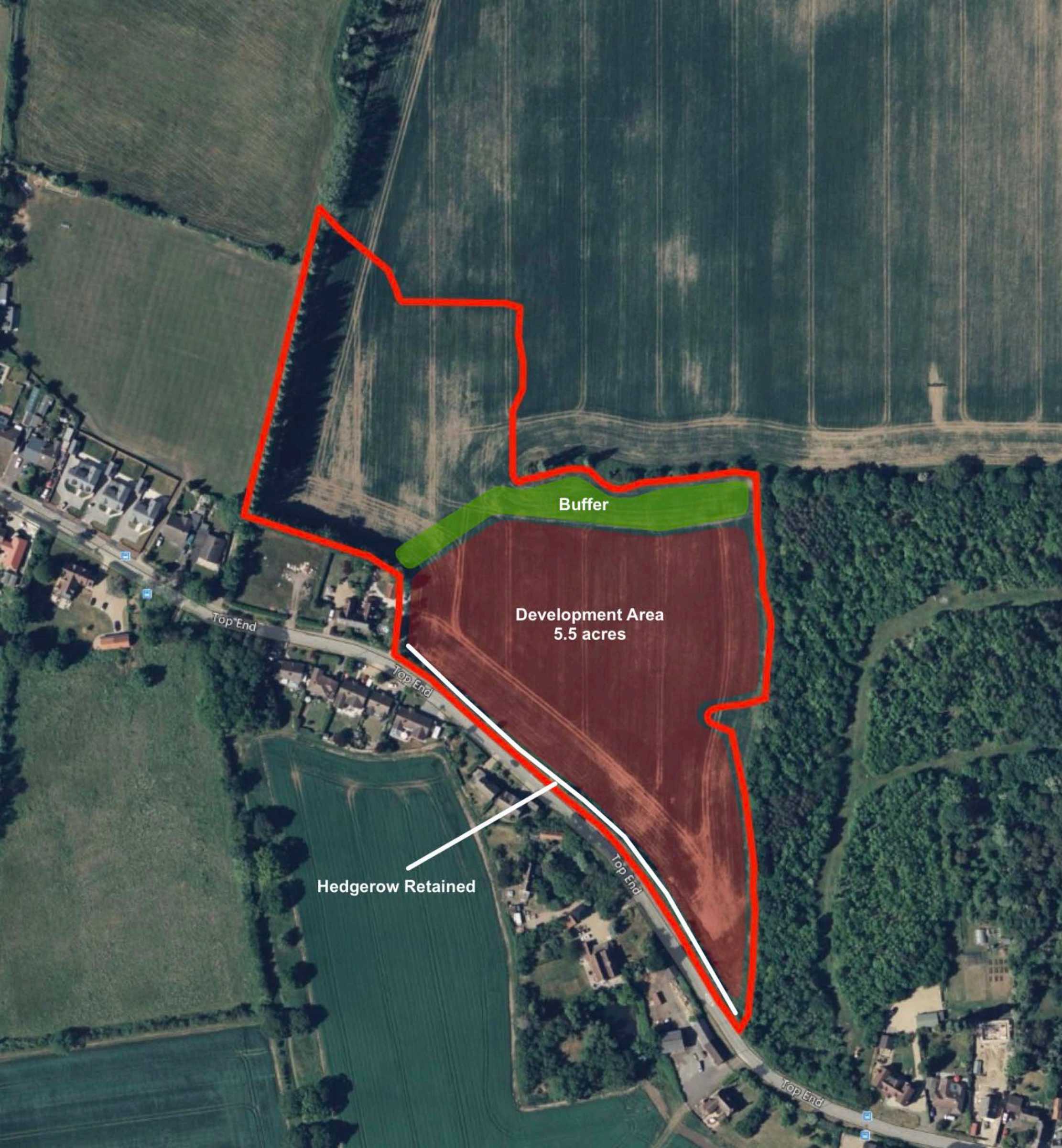
Top End

Top End

Top End

Top End

Top End



Buffer

Development Area
5.5 acres

Hedgerow Retained

Top End

Top End

Top End

Top End



Buffer

Development Area
7 acres

Hedgerow Retained

Top End

Top End

Top End

Top End

Top End

Appendix 2: BBC Site Assessment Pro Forma

ID
431

a) Address of site
Land to the north of Top End,
Renhold, Bedfordshire, MK41
0LS.

a) What is the primary use you propose for the site?
Housing

Site size (ha)
3.94

The number of dwellings the site could provide.
25

Site size threshold
Above

The gross floor space that the site could provide.

Overriding constraint?
Site not in accordance with the emerging development strategy

Stage 1 conclusion
Exclude from further assessment

Stage 2 Assessment of suitability, availability & achievability

Stage 2 conclusion

Stage 3 Assessment against sustainability objectives

1a. Within or adjoining UAB SPA or built form of a small settlement

x The site is not within or adjoining the urban area or a defined settlement policy area, or within the built form of a small settlement

1b. Accessible on foot to a food store?

xx A site accessibility score of 0 is recorded where 0 is more than 30 minutes' walk.

1c. Accessible on foot to a primary school?

+ A site accessibility score of 6 is recorded where 6 is 11 - 20 minutes' walk.

1d. Accessible on foot or by bus to a major employer?

x The site is within 10 minutes' walk of a bus stop with an infrequent bus service (less frequent than hourly each day) which enables travel 8am-6pm Monday to Friday to a major employer.

1e. Outside, adjoining or within the air quality management area?

+ The site is not within or adjoining the air quality management area.

2a. Within or adjoining site of nature conservation importance

x The site is within or adjoining a site of nature conservation importance

2b. In an area where protected species are known or likely to exist?

x Protected species could be affected.

2c. Potentially able to achieve a net gain in biodiversity?

? Uncertain or insufficient information

2d. Able to link into the green infrastructure opportunity network?

0 The site is not within or adjoining the green infrastructure opportunity network or the impact of the proposals is neutral.

2e. Likely to impact on an area currently providing ecosystem services.

+ Opportunity area for 3 or more ecosystem services covers less than 25% of the site.

3a. Proposing a renewable energy scheme or extra energy efficiency standards?

0 No renewable energy generation scheme included and efficiency standards that meet normal standards.

3b. Within or adjoining the urban area, a defined settlement policy area or the built form of a small settlement?

3c. Accessible on foot to a food store?

xx A site accessibility score of 0 is recorded where 0 is more than 30 minutes' walk.

3d. Accessible on foot to a primary school?

+ A site accessibility score of 6 is recorded where 6 is 11 - 20 minutes' walk

3e. Accessible on foot or by bus to a major employer?

x The site is within 10 minutes' walk of a bus stop with an infrequent bus service (less frequent than hourly each day) which enables travel 8am-6pm Monday to Friday to a major employer.

4a. Likely to impact on designated or nondesignated heritage assets or their settings?

x The proposal has the potential to cause harm to heritage assets. This harm may range from low to high. There may be options to avoid, reduce or mitigate this harm and where sites have not been ruled out together for other reasons, further assessment will be undertaken to more fully explore impacts on significance and options for harm reduction and mitigation. This further assessment may ultimately lead to the conclusion that the site should not be allocated.

5a. Likely to increase future economic and employment opportunities?

0 Proposals not employment related.

6a. Proposing a main town centre use in, on the edge or outside of a town centre?

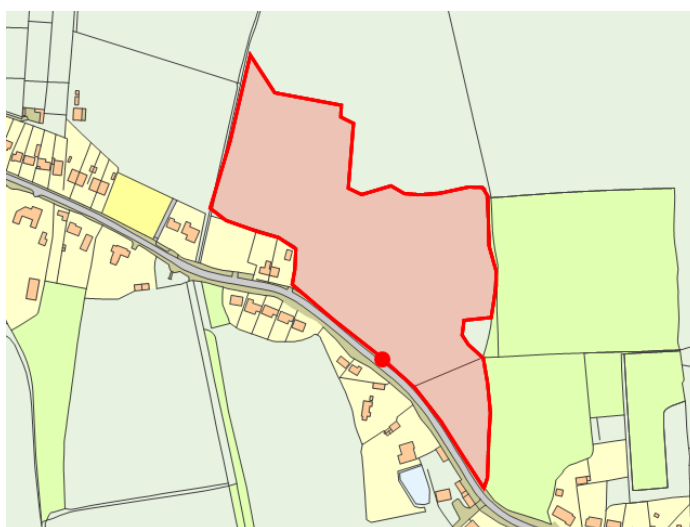
0 Proposals do not include a main town centre use.

7a. Within 400m of an existing open space or proposing open space within it?

x The proposal does not include and is not within 400m walking distance of a publicly accessible open space.

7b. Within 800m of a sports facility or proposing a sports facility within it?

x The proposal does not include and is not within 800m of a publicly accessible sports facility



8a. Likely to have a significant adverse impact on the surrounding landscape?

? It is uncertain what effect the proposals are likely to have on the landscape / more information is required.

8b. Within the existing settlement form?

x The site is separated from a defined settlement policy area or the built form of a small settlement.

9a. On previously developed land?

x The site is not previously developed and as defined in the NPPF.

9b. On best and most versatile agricultural land ie grades, 1, 2 or 3a?

x A or a majority of the site is best and most versatile agricultural land as defined in the NPPF.

10a. Within a groundwater source protection zone?

+ The site is not located in a source protection zone.

11a. At risk of flooding?

+ The site is within flood zone 1 (areas that have been shown to be at less than 0.1% chance of flooding in any year).

12a. Likely to provide a mix of housing, including affordable housing?

+ The site is likely to provide a mix of housing and include affordable housing.

12b. Able to address a particular housing need?

+ The development will meet identified housing needs eg elderly, care, travellers.

13a. Within 800m of a facility where cultural or social activities can be accessed?

+ The site is within 800m of a facility where cultural or social activities can be accessed.

14a. Likely to encourage social cohesion?

0 Neutral.

14b. Likely to help make the area safer? +

+ The development is likely to increase public surveillance or increase activity.

15a. Within or adjoining the urban area, a defined settlement policy area or the built form of a small settlement?

x The site is not within or adjoining the urban area or a defined settlement policy area, or within the built form of a small settlement.

15b. Accessible on foot to a food store?

xx A site accessibility score of 0 is recorded where 0 is more than 30 minutes' walk.

15c. Accessible on foot to a primary school?

+ A site accessibility score of 6 is recorded where 6 is 11-20 minutes' walk.

15d. Accessible on foot or by bus to a major employer?

x The site is within 10 minutes' walk of a bus stop with an infrequent bus service (less frequent than hourly each day) which enables travel 8am-6pm Monday to Friday to a major employer.

15e. Connect highway without constraint?

+ No access constraints.

15f. Highway or junction capacity issues

? Potential capacity problem requiring mitigation.

Stage 4 Assessment against additional constraints and other considerations**Highway comments**

The site is located north of Top End Road in the village of Renhold approximately 5.5 miles northeast of Bedford town centre. Access to the site will be from Top End Road. Some moderate traffic along Top End Road, however traffic generation from the potential development would likely not cause significant issues. The nearest bus stops are south on Top End Road approximately 200m in distance. Most of the frontage of the site has footway of 1m and cycling is possible on by using the road. Improve footways along site frontage for pedestrians and consider marking onstreet cycle lanes along Top End Road.

Contaminated Land**Mineral Safeguarding Area**

Site does not fall within the boundary of a MSA.

Environmental Health notes

no noise concerns

Site assessment conclusions

The site has been excluded from further assessment at Stage 1 because its location is not in accordance with the development strategy.



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