

**Representation form for the Bedford Borough Local Plan 2040: Plan for Submission (Regulation 19 publication stage)**

**Please refer to the** [**guidance notes**](https://edrms.bedford.gov.uk/OpenDocument.aspx?id=tqfcv8PIi9gZ9ouyx%2bOWlw%3d%3d&name=Guidance%20notes%204.pdf) **available before completing this form.**

**Please return to Bedford Borough Council by 5pm on 29th July 2022.**

This form has two parts –

Part A – Personal details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

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| **Part A** | | | | | | |
| 1. Personal details\* |  |  |  |  |  | 2. Agent’s details (if applicable) |
| \**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.* | | | | | | |
| Title |  | | |  | |  |
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| First name |  | | |  | |  |
|  | | | | | |  |
| Last name |  | | |  | |  |
|  | | | | | |  |
| Job title |  | | |  | | Chairman |
| (where relevant) | | | | | |  |
| Organisation | Hallam Land Management Ltd | | |  | | David Lock Associates |
| (where relevant) | | | | | |  |
| Address line 1 | 10 Duncan Close | | |  | | 50 North Thirteenth Street |
|  | | | | | |  |
| Line 2 | Red House Square | | |  | | Central Milton Keynes |
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| (where relevant) | | | | | |  |

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| **Part B – Please use a separate sheet for each representation** | | | | | | | | | | | | | |
| Name or organisation: | | | | | | | | | | | | | |
| 3. To which part of the Local Plan does this representation relate? | | | | | | | | | | | | | |
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| Paragraph | |  | Policy | | DS2(S) | | Policies Map | | | |  | | |
| 4. Do you consider the Local Plan is : | | | | | | | | | | | | | |
| 4.(1) Legally compliant  4.(2) Sound | | | | Yes  Yes | | 🗸 | | |  | | | No  No |  |
|  | | |  |
|  | | | 🗸 |
| 4 (3) Complies with the  Duty to co-operate Yes No  🗸 | | | | | | | | | | | | | |
| Please tick as appropriate | | | | | | | | | | | | | |
| 5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.  If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. | | | | | | | | | | | | | |
| Hallam Land Management objects to the proposed spatial strategy in Policy DS2(S), which is based on a preferred option, as set out in the Development Strategy Topic Paper that focusses narrowly on variants of Option 2, whilst rejecting the alternatives or elements presented in Option 1 and 3-7 and its variants. Attached to these representations, is a note prepared by Hallam’s Transport Consultants: Brookbanks, that considers the transport effects and issues arising from the preferred spatial strategy option – as reported in the Evidence Base.  Hallam considers that the spatial strategy, if it is to fully meet the tests of soundness, needs to be based on a soundly identified preferred option that is more reflective of a balanced and appropriately weighted approach in planning for sustainable development across the Borough. In this regard, Hallam considers that the strategy must include an appropriate combination of the wider options that have been identified and assessed with due weight given to those that can create, or contribute towards, a balanced and sustainable spatial strategy.  The proposed spatial strategy, although positive in focus towards Bedford, notwithstanding the constraints of the A6 corridor, exclude opportunities for development at an appropriate scale to support existing communities that have the greatest potential to contribute to growth objectives in a sustainable way - aligned with requirements of paragraph 23 of the NPPF. There are also doubts as to whether the spatial strategy would be able to provide sufficient capacity, in isolation, for growth, certainly around rail station locations, provide opportunities for maximising sustainable accessibility to Bedford and along the East West Rail corridor.  No change is observed in the evidence base or the outcome of the existing plan – that existing well connected and well served settlements represent highly sustainable options for development. Specifically, the spatial strategy should not preclude sustainable development opportunities to the north of Bedford that are able to capitalise on the investment to be made in East West Rail and improving connectivity to Bedford station – rail related potential is not limited to the south of the town and Bedford station is as, or more, accessible from the north – more so with enhanced sustainable transport links, potentially including the A6 corridor as a focus for infrastructure investment (i.e. more frequent bus services and physical walking and cycle links) which would be more reflective of the objectives set out in paragraph 104 of the NPPF and policy in paragraph 105 of the NPPF. Moreover, as summarised in the attached note prepared by Brookbanks, the particular focus of the Preferred Strategy on the A421 and to the south of Bedford is shown to result in the most significant transport effects in terms of junction delay and volume to capacity ratios, consequent upon the strategy, to be concentrated within the A421 corridor and to and in the southern part of the town of Bedford.  Hallam, therefore, considers that the spatial strategy should not rule out opportunities for continued development at Key Service Centres, particularly to the north of Bedford which is otherwise avoided. It should actively encourage sustainable development at Clapham – the settlement most closely associated with Bedford and the investment in the Bedford Transport hub.  Other than the levels of growth committed to in the plan that are carried forward from the Local Plan 2030, the growth of Key Settlements is likely to rely on windfall development without any additional allocations that would allow meaningful growth at an appropriate scale to support these settlements over the remaining 10-year period – the assumption being that growth will be directed ONLY to the south of Bedford and the Little Barford new settlement. In Hallam’s view, the approach suggested does not fully accord with paragraphs 60 & 68 of the NPPF, certainly in terms of the amount, type and location of sites that are to be brought forward both before and after 2030.  Such an approach will fail to realise sustainable investment in those existing communities and their infrastructure. Indeed, the opportunities that do exist to invest in sustainable transport, both for new and existing communities to the north of Bedford, should be identified and supported through the transport and growth strategies of the plan. As identified in the attached note prepared by Brookbanks, options to include some development to the north of Bedford were largely rejected on the basis of the potential impacts arising from new settlement scale growth at Twinwoods or Colworth. No assessment was made of the potential of more limited opportunities for growth focuussed on well located locations closely linked through sustainable modes to Bedford – most notably at Clapham. The fact that the Council considers mitigation opportunities in the A6 corridor to be insufficient to support major scale development at Twinwoods or Sharnbrook, does not mean that there are not opportunities to be realised through lesser scale sites (than Twinwoods or Sharnbrook) in sustainable existing communities – served directly by high quality sustainable transport infrastructure – locations that are implicitly sought by paragraph 105 of the NPPF.  In this context, Hallam considers that the spatial strategy should combine elements of the wider discounted options (1 & 3-7) to best achieve the scale of growth that is likely to be required. Such an approach would better align with the NPPF and allow the site to better meet the soundness tests of being consistent with national policy and in turn allowing the plan to become sound in terms of being more effective, justified and positively prepared.  Hallam considers that elements of discounted options have a part to play if the housing numbers are to be met in capacity terms, more so in the current submission draft given the increase in the annual housing requirement, and in securing an appropriate geography of opportunities and in helping meet the deliverability gap that is implied by the stepped housing trajectory relying on the significantly stepped up delivery of housing growth with the allocations of large scale new communities or settlements later in the plan period.  Hallam also considers that the spatial strategy must enable a robust trajectory of delivery to come forward. In practice, Hallam have suggested that this will require the identification of additional opportunities at settlements that have the potential and capacity for growth (as evidenced by SHLAA and call for site submissions that are positively assessed), certainly for the shorter to medium term which, in turn, should better balance the rate of supply across the plan period and allow for sufficient lead in times to bring strategic allocations forward in a way that is well coordinated with the delivery of strategic infrastructure. Housing monitoring data demonstrates that rates of housing delivery are already consistently above the rate of provision proposed in the housing trajectory.  Of particular concern, the overreliance on a small number of policy options, and the rejection of others (e.g. rural service centres) is in effect a U Turn in the policy directions proposed in the Plan. From the adopted Plan, where Rural Service Centres (for instance) were recognised as highly sustainable locations for, and a focus of growth, the 2040 proposed submission draft appears to effectively preclude further development at such locations. The consequence of such a profound shift in policy direction (in relation to Rural Service Centres and indeed other development options (whether positive or negative)) is to gravely increase the risk of a major discontinuity in the delivery of the new homes that are so urgently required and, also, in the delivery of infrastructure in the Plan area. Just by way of example, existing planned expansion at Clapham in the adopted Plan will generate the need for a 1FE school yet provision is required to be made for a 2FE primary school which is the aspiration of the education Authority and which would best benefit the community. The about turn in the policy and the absence of any continuity in the commitment to rural service centres and Clapham suggests that there is little prospect of the 2FE school being delivered.  Of those locations identified for more strategic scale development along the A421 and East West Rail corridor, account should also be taken of cumulative delivery rates in the context of the scale of delivery being planned in Bedford Borough but also in Central Beds and other adjoining locations such as those that will be served by the A421 and East West Rail corridor. Some flexibility or tolerance may be required with anticipated delivery timescales. Such uncertainties and a requirement for contingencies translates into a more balanced and critically an adaptable and flexible focus that embraces additional foci for growth and in particular looks also towards the north of Bedford.  Whilst considering that a multi-faceted strategy will be required, Hallam considers that a substantial emphasis must continue to be placed in and around the edges of Bedford and therefore, emphasises for clarity, that this must extend beyond the 0.5 miles of the urban area boundary to include the most immediate neighbouring settlements that have significant potential to benefit from enhanced sustainable connections with Bedford, its town centre and railway station. To some extent, growth beyond 0.5 miles of the urban areas is reflected in the spatial strategy with housing allocations to the south of Bedford, and in this context, the north of Bedford also offers good potential which is not being fully recognised. An example in this context is Clapham. Clapham is a positive example of a settlement that will support further growth around Bedford. It lies some 3.5km from the Town Centre and Railway Station, has the potential for improved connectivity with public transport and walking and cycling infrastructure to complement improvements at the A6 Gateway (being delivered under the Transporting Bedford 2020 Project). Delivery of the Great Ouse Way, which completes a western bypass of the A6 arguably, in relieving traffic pressures on the Shakespeare Road and Ashburnham Road sections of the A5141, provides an additional opportunity for transforming this corridor into a more pedestrian and cycle focussed route – thus lock in the full benefits of the Great Ouse Way.  Furthermore, Clapham becomes even more sustainable as a location as investment takes place in Bedford Town Centre and in the Bedford Midland Station and rail services. There are substantial opportunities for synergy between new homes at Clapham and the enhancement of the social and environmental and quality of life characteristics of the community, particularly through the enhancement of public transport services and physical walking and cycling infrastructure.  Relative to Clapham, some identified sites for growth to the south of Bedford do not offer the same opportunities for maximising multi-modal connectivity – key barriers to active travel being, in some instances, the A6 western bypass of Bedford and Kempston and the A421 corridor.  For instance, and in comparative terms:   * Land allocated at Gibraltar Corner (HOU13) is proposed in a small settlement that lies west of the A6 - services and facilities have to be accessed by crossing the A6 (albeit via a cycle and pedestrian underpass). The site being some 5km from Bedford Town Centre and the railway station is more distant than Clapham. * Land South and East of Wixams (Allocations HOU15 & HOU16) forms a location for housing growth to the south of Bedford, east of existing growth at Wixams. Delivery of this site will be reliant on infrastructure investment to provide good accessibility and the delivery of wider supporting community infrastructure. Hence, delivery is likely to require be longer lead in times not least in relation to the required infrastructure. Again the site is some 5km from Bedford Town Centre and railway station, and opportunities for multi-modal connections are more limited and is likely to require significant investment. Relative to Clapham, the A421 corridor is a key barrier to improving connectivity for sustainable modes. * Land at Shortstown (Allocations HOU17 & HOU18) forms a continued expansion of development at this new settlement which has the benefit of infrastructure investment and new local facilities. At some 4-4.5km the distance is slightly further than Clapham. However multi-modal connectivity, particularly for cycling is limited.   The comparative sites above, their relationship with Bedford, certainly in terms of their connectivity merits, underscores the potential of Clapham in being equally or indeed more advantageous as a location for growth in a location proximate to Bedford. The effective exclusion of even limited housing growth to the north of Bedford in close proximity to it – has the effect of adding to the transport impacts to the south and in the south of the town as a result of the preferred spatial option. An appropriate scale of development at Clapham already capitalises on strong and planned sustainable transport links with the potential to enhance them further. It is in this context that the preferred strategy, in not allowing for additional growth at Clapham, a settlement that has the demonstrable capacity to expand, is fundamentally flawed for achieving sustainable growth, certainly in the context of paragraphs 104 and 105 of the NPPF and also providing for a wide mix of sites, as suggested under paragraph 68 of the NPPF. That there remain substantive highly sustainable development opportunities at Clapham is evident from the technical assessment work carried out by Aecom in support of the Clapham Neighbourhood Plan. The Aecom evidence base concluded that there were additional, unallocated, sites at Clapham (for at least 500 dwellings) that were entirely appropriate for development performing at least as well, if not better, than sites allocated for through the previous Adopted Local Plan and made Neighbourhood Plan.  The potential for Clapham to accommodate future growth and being well connected to Bedford, whilst being distinct as a settlement, is evidenced by Hallam’s submissions in response to the Call for Sites. Equally highly sustainable options such as at Clapham presents the opportunity for the Borough Council to encapsulate a Greater Bedford element in the Local Plan and for this to be expressed as a key part of its spatial strategy and also the Local Plan vision and related policies such as for the timing of housing growth and its distribution. As outlined above, the level of ambition in the forthcoming plan will have to be high and should be so. The Council is not able to fall back on piecemeal solutions but needs a comprehensive approach. A Greater Bedford element to the plan, including the urban areas and immediate connected settlements would reflect that ambition and provide a positive framework for investment and early delivery.  The Development Options Topic Paper, in referring to the sustainability appraisal of the broad components of growth, considers the urban area component of the preferred options (including the rejected variants of Option 1, which would play a key role in a wider strategy) to perform best and then considers the adjoining urban area component to perform almost as well. In this context it follows, in Hallam’s view, that growth in immediate neighbouring settlements to the Bedford Urban Area such as Clapham are also capable of performing just as well as what is currently considered to be the adjoining urban areas, and the locations for growth currently proposed to the south of Bedford, with enhanced sustainable connections in the form of frequent public transport services and active travel routes. In this context a limit to identifying opportunities for growth to within 0.5 miles of the urban area boundary is considered arbitrary and not necessarily reflecting functional relationships. In practice, existing settlements such as Clapham are arguably better located than sites in the immediate adjoining area, as described above, where patterns of existing development and transport corridors including the A6 western bypass and A421 are likely to constrain opportunities for development that can fully exploit and enhance sustainable transport corridors.  In Hallam’s view the definition of the adjoining area should be broadened to include the most immediate settlements that are able to be well connected though relatively modest infrastructure investment that encourages sustainable movement. In essence, this approach begins to reflect elements of Options 3b and 3c, 4, 6 and 7, insofar that the focus is extended to those smaller settlements that are immediately adjacent to Bedford and have the potential to benefit from enhanced sustainable connectivity.  An added benefit of securing an appropriate level of growth in those smaller settlements, particularly those adjacent to Bedford, would also be to support local services. Key Service Villages such as Clapham with additional development has the potential to support and enhance the offer of local services, including community facilities and local retail. These benefits are particularly important for people who do not have access to a car. A greater reliance of access to local services and facilities have been underpinned recently by the changes to working and living patterns arising through the Covid-19 pandemic. The benefits are also well aligned with paragraph 73, objective b) in the NPPF. Furthermore, with regard also to paragraph 73, objective a) in the NPPF, Clapham offers the potential to accommodate additional development that can support the co-ordinated improvement of existing infrastructure. With much of the hard infrastructure in place Hallam envisages improvements involving enhancements to transport corridors into Bedford to the railway station to access East West Rail and the town centre to reinforce its vitality and vibrancy, fully exploiting the benefits to be maximised by the recent opening of the Great Ouse Way which, in effect, completes a western bypass around Bedford.  In the context of tackling climate change, locating new development in immediate settlements adjacent to Bedford offers the potential to create the critical mass necessary to support and enhance public transport services with increased frequencies to enable them to become modes of choice. Similarly, development can support investment in active travel infrastructure, better supporting the objectives of paragraph 104 of the NPPF and in turn paragraph 105.  The co-ordinated growth of settlements within a ‘cycle-shed’ of Bedford, as a key part of the overall strategy provides an opportunity for capturing value from new developments alongside access to funding for sustainable transport infrastructure to invest in cycleways – including corridor improvements for continuous links (e.g. wider pavements, on road facilities). Such an approach would contribute significantly towards the England’s Economic Heartland’s Transport Strategy and align with Bedford Boroughs’ own transport principles – in terms of improving public transport networks and local connectivity and accessibility through active travel.  The approach aims to complement the focus toward strategic locations/settlements to the south and west of Bedford, insofar that Clapham has similar, if not more advantageous strengths in being close to Bedford and being better connected, as demonstrated above.  Furthermore, a rationale in the current adopted development strategy is apportioning growth to Key Service Villages to support the provision of new Primary Schools with a scale of growth sufficient to support the delivery of 1 form of entry accommodation, is at odds with the Borough’s Council’s position (as set out in its paper for Education Provision for the Local Plan 2030) that new primary schools should by preference be for 2-3 forms of entry. It follows in this context that allocating further development to Key Service Villages would enable for the delivery of primary schools that are of an operationally efficient and preferable size (i.e. 2-3 forms of entry).  (Continue on a separate sheet /expand box if necessary) | | | | | | | | | | | | | |
| 6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. | | | | | | | | | | | | | |
| Given the key considerations that are set out above, Hallam considers that the proposed spatial strategy should include:  1. Embracing and including urban based growth and areas adjoining the Bedford urban area boundary including immediate neighbouring settlements (i.e. such as Clapham) that are or have the potential to be well connected to Bedford (therefore, partially reflecting Options 3b, 3c and Options 4 and 6) recognising also the contribution such elements can make before larger scale elements of the strategy.  As such Hallam consider that Policy DS2(S) Spatial strategy should be reworded as follows:  **Policy DS2(S) Spatial strategy**  To deliver sustainable development and work towards making Bedford a net zero carbon emissions borough at the heart of the Oxford – Cambridge Arc, development will be focussed within the Greater Bedford urban area, at specified strategic locations adjacent to the Greater Bedford urban area and at growth locations within the A421 / East West Rail corridor. All new development will be required to contribute towards achieving the stated objectives and policies of this plan, in line with the Infrastructure Development Plan, through:  **Within the Greater Bedford urban area**  i. Maintaining and enhancing Bedford town centre as a vibrant and resilient location and multifunctional destination. Regenerating vacant spaces and including the establishment of an expanded residential and cultural quarter at Mayes Yard and town centre living at Greyfriars;  ii. Establishing a new station quarter and Midland Road gateway, including the redevelopment and regeneration of the area around Bedford Midland station to provide an academic and skills quarter and vibrant corridor between the town centre and rail station;  iii. Establishing vibrant new areas for urban living in Bedford’s urban core at sites on Ampthill Road and on sites allocated in Local Plan 2030 including land south of the river and at Ford End Road;  iv. Making best use of brownfield and other available land within the urban area.  vi. Residential development focussed at sites in immediate neighbouring Key Service villages that have the potential to benefit from enhancements to multi-modal sustainable connections with Bedford town centre and the railway station;  **Strategic locations adjacent to the urban area which contribute to delivering the Bedford – Milton Keynes Waterway Park and the Bedford River Valley Park**  vi. Residential-led development focussed at Gibraltar Corner and the Bedford River Valley Park north of the A603 which enhances and expands areas of green infrastructure and, in doing so, prevents coalescence between the urban area and existing settlements to protect their separate character and identity;  vii. Employment-led development at land south of Goldington Road.  **Growth locations on the East West Rail / A421 transport corridor and with the potential for rail based growth**   South of Bedford policy area  viii. Establishing an Arc-leading new settlement south of Bedford for innovation and an exemplar for landscape-led development and community building, based around the opportunity that the Stewartby Hardwick station on East-West Rail and the new Wixams station on the Midland Main Line presents;  ix. The completion of Wixams new settlement, incorporating eastern and southern extensions, and the development of a strategic village expansion utilising brownfield land at Kempston Hardwick identified in Local Plan 2030;  x. An expansion of Shortstown to the west with active travel links to the rail network.  Little Barford area  xi. A new settlement and related employment provision at Little Barford well connected to the new East-West Rail station at its intersection with the East Coast Main Line.  Other employment sites  xii. Locations well-related to the strategic road and rail network that will deliver employment growth, making Bedford an attractive place to do business.  Rural area  xiii. The completion of strategic Key Service Centre outside the Greater Bedford area and more limited Rural Service Centre residential development identified in Local Plan 2030 on sites which are allocated in neighbourhood plans and the completion of Local Plan 2030 Policy 27 Land north of School Lane, Roxton;  xiv. Safeguarding the intrinsic character of the countryside and the environment and biodiversity.  (Continue on a separate sheet /expand box if necessary) | | | | | | | | | | | | | |
| ***Please note.*** *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*  ***After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.*** | | | | | | | | | | | | | |
| 7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? | | | | | | | | | | | | | |
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|  |  | **No**, I do not wish to  participate in  hearing session(s) | | | | | | 🗸 | | **Yes**, I wish to participate in hearing session(s) | | | |
| Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate. | | | | | | | | | | | | | |
| 8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: | | | | | | | | | | | | | |
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| Hallam Land Management Limited believes, in promoting land at Clapham, that they have a key role to play in the delivery of housing in the Local Plan.  David Lock Associates and Hallam Land Management are able to support the Local Plan examination by providing evidence in relation to the deliverability of the spatial strategy and the provisions in the Local Plan that are necessary to support the delivery of the Plan objectives and hence which would make the Plan sound. | | | | | | | | | | | | | |
| ***Please note*** *the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.* | | | | | | | | | | | | | |