

LP2040 DRAFT LOCAL PLAN FOR BEDFORD BOROUGH

Plan for Submission June – July 2022

Land at to the west of Odell Road, Harrold

Prepared by Fisher German LLP

Project Title

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1. Introduction

1.1 This representation has been prepared on behalf of [REDACTED] in respect of their land interests to the west of Odell Road, Harrold as illustrated on Figure 1 below – the site is edged red. This site is an omission site in the emerging Bedford Local Plan 2040. The site is considered suitable for allocation in the scenario that further housing sites are required to enable the Local Plan to be found sound (as we consider to be the case as set out within these representations).



Figure 1: Site Location Plan, Land west of Odell Road, Harrold (Blue: Neighbourhood Plan allocations)

1.2 Harrold is a sustainable settlement designated in the adopted Local Plan as a Rural Service Centre. Harrold is the highest scoring Rural Service Centre in the Borough (59 points), scoring only a few points less than settlements designated as Key Service Centres (Settlement Hierarchy Paper 2018), such as Great Barford which score 62 points. The adopted Local Plan seeks to deliver 25 - 50 dwellings in Harrold through the emerging Neighbourhood Plans (this is in contrast to the 500 dwellings in the Key Service Centres, which Harrold falls just outside of). In historic iterations of

the Bedford Local Plan (2015 consultation paper) the Council produced evidence which demonstrated that the Rural Service Centres such as Harrold could each accommodate up to 150 dwellings. The Council recognised the benefits of delivering larger developments in the Rural Service Villages advising that:

“Some villages have experienced the loss of vital services such as shops and pubs in recent years. Changing the current strategy of restraint in the rural policy area could increase the population and change the age profile of rural villages. An increase in activity and spending power would support existing vulnerable village services and facilities, and possibly lead to new provision. Furthermore, larger developments would be likely to bring with them a range of types and sizes of housing, which would provide more choice for existing residents wanting to stay within a village but down-size.” (Development Strategy and Site Selection Methodology Background Paper, September 2015)

- 1.3 The draft policies at that time supported such an allocation. Despite this latent capacity, the Council ultimately sought to reduce the quantum of housing to be delivered within the Rural Service Centres in favour of a new settlement, however, when the viability and deliverability of this was challenged the Plan period was reduced with an early review mechanism. A number of interested parties objected to this approach of the new settlement and the thereafter the reduced Plan period allowing the Plan to be found sound with the new settlement removed.
- 1.4 Harrold Neighbourhood Plan has since progressed to referendum on 18 November 2021. The result demonstrated support for the Neighbourhood Plan, with 86% of votes in favour, with a 28% turnout. The Neighbourhood Plan was ‘Made’ on 5 January 2022.
- 1.5 The Neighbourhood Plan identifies land to deliver 25 dwellings across two allocations, the minimum level of growth identified in the Local Plan. This includes land fronting onto Odell Road (17 dwellings), immediately adjacent to the wider land now being promoted. Notwithstanding this, as has already been evidenced by the Council, settlements such as Harrold remain well positioned to provide additional sites to ensure the Council can meet its future housing needs. Sites in the Rural Service Centres can deliver quickly and ensure that the step change in delivery is met in the initial years of the Plan period whilst maintaining the vitality and viability of the services and facilities these settlements offer.
- 1.6 The land west of Odell Road, Harrold can deliver circa 60 dwellings, subject to detailed masterplanning based on the site’s opportunities and constraints. It is considered this is

commensurate with the size and sustainability of the settlement and combined with the 25 dwellings to be delivered through the Neighbourhood Plan would still be significantly below of the 150 dwellings the Council has previously evidenced the settlement can deliver within the Local Plan period. Indeed, having regard to the sustainability of the settlement, and its place within the settlement hierarchy, just below those settlements which are expected to deliver 500 dwellings, it is considered that the capacity of Harrold to accommodate new homes could be greater than 150 dwellings.

1.7 This representation follows policies in the order that they appear in the consultation document.

2. Representations

The Tests of Soundness

- 2.1 As this consultation stage concerns a Local Plan 2040 Draft for Submission (Regulation 19), the consultation seeks views on the legal tests of soundness and legal compliance. Paragraph 35 of the National Planning Policy Framework (NPPF) (2021) states:

"Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

- 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 and other statements of national policy, where relevant."*

- 2.2 It is our view, for the reasons set out below, that the Local Plan is not sufficiently justified, is not effective and is not consistent with National Policy. It therefore fails to meet the legal tests of soundness.

Policy DS2(S) Spatial Strategy

- 2.3 The overarching aims and ambitions of the Spatial Hierarchy are generally supported. However, we have concerns that the approach adopted underutilises the role of existing sustainable settlements, including the Rural Service Centres, and places a significant overreliance on the delivery of new settlements and is not therefore sound because it has not taken full account of all the reasonable alternatives or is likely to be deliverable.

2.4 Reasonable alternatives are discussed within the ‘Development Strategy Topic Paper’ (May 2022). It notes that the Oxford to Cambridge Arc impacts are not yet known and so the growth strategy focuses only on Bedford’s own growth requirements.

2.5 Through previous consultations, the following growth options were put forward:

- Option 1a – development in and around the urban area only
- Option 1b – sites within the urban area at enhanced density
- Option 2a: Development in and around the urban area, plus A421 transport corridor with rail-based growth – south.
- Option 2b: Development in and around the urban area, plus A421 transport corridor with rail-based growth – south, plus one new settlement.
- Option 2c: Development in and around the urban area, plus A421 transport corridor with rail-based growth, plus two new settlements.
- Option 2d: Development in and around the urban area, plus A421 transport corridor with rail-based growth – south and east, plus one new settlement.
- Option 3a: Development in and around the urban area, plus four new settlements.
- Option 3b: Development in and around the urban area, plus two new settlements, plus key service centres.
- Option 3c: Development in and around the urban area, plus two new settlements plus key service centres, plus rural service centres.
- Option 4: A421 transport corridor with rail-based growth, plus key service centres, plus rural service centres.
- Option 5: A421 transport corridor with rail-based growth, plus two new settlements.
- Option 6: A421 transport corridor with rail-based growth, plus two new settlements, plus key service centres, plus rural service centres.
- Option 7: Development in two new settlements, plus key service centres, plus rural service centres.

2.6 Within the topic paper, the Council consider that a reasonable alternative for the purposes of the NPPF test was an alternative that could provide dwelling growth within 10% of the required need.

2.7 As detailed in response to Policy DS3 and DS5, there seems a reluctance by the Council to allocate further growth to the Rural Services Centres despite the acknowledged available capacity and the benefit being that proportionate growth would be delivered earlier in the Plan period, rather than almost solely relying on the delivery of strategic sites. In the context of immediate housing need and with the current cost of living crisis, failure to deliver housing in settlements such as Harrold will result in more and more people being forced out of the settlements in which they may currently live and continue to suppress natural household formation. All settlements, but particularly sustainable settlements with a service offer, need proportionate and commensurate growth throughout the Plan period also, to ensure they do not age and stagnate.

- 2.8 Land west of Odell Road, Harrold has demonstrated that there would not be any adverse impact on the landscape and settlement character as a result of the site coming forward for development. In terms of the reduced ability for rural sites to be accessible to rail by active travel, it is important to note that some sites would be accessible by active travel, but more broadly they would be accessible by green travel through the ongoing transition to hybrid and electric cars, public transport and cycling. Moreover, due to an increased prevalence in home working and online deliveries, people are able to live more sustainably in what was traditionally considered to be a less sustainable location.
- 2.9 The Plan and Strategy also has a deliberate disregard of the role that Neighbourhood Plans should be playing in accommodating growth beyond their current period to 2030. Neighbourhood Plans should be policy bound to allocate an amount of growth up to 2040, as they were obliged to within the 2030 plan (see current policy 4S). NPPF Paragraph 66 sets out that Strategic Policies should *"set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations"*. Clearly to reflect the overall strategy as required by the NPPF, this must extend requirements up to 2040.

Policy DS3(S) Amount and timing of housing growth

Amount of Housing

- 2.10 Policy DS3(S) outlines the Council's preferred approach to the delivery of housing, including the housing requirement and the temporal delivery of housing over the Plan period. This includes a 'stepped trajectory', with the housing requirement to increase throughout the Plan period.
- 2.11 The Plan utilises the baseline Local Housing Need (LHN) as the housing requirement, equating to 27,100 dwellings over the Plan period. The PPG is clear that when establishing a housing requirement *"the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area... Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates."* [our emphasis] (Paragraph: 010 Reference ID: 2a-010-20201216). Examples of scenarios which may justify an increase of housing requirement include growth strategies, the delivery of strategic infrastructure improvements or the requirement of an authority to take on unmet need from a neighbouring authority.
- 2.12 It is important to note that the PPG sets out that the consideration of whether uplifts to the housing requirement from LHN are necessary should be undertaken prior to and independently of

any consideration of the ability of an area to meet that need.

- 2.13 The Plan discusses the housing requirement at Paragraphs 4.7 and 4.8 of the reasoned justification, albeit there is no discussion as to whether a higher housing requirement would be justified. The reasoned justification seems to challenge, informally, the LHN requirement. The Plan asserts that population would need to increase by 50,000 people with in-migration of more than 22,000 a year above existing trends to populate homes within Bedford at the standard method rate of 1,355 dwellings per year. However, it is significant to note, and acknowledged within the Plan, that Bedford Borough falls within the Oxford to Cambridge Arc. Whilst there is a lack of clarity on the onwards direction of the top-down vision for the Arc, accelerated growth is likely to occur irrespective, led through economic demands which will drive an above historic trend rate of growth and migration. Furthermore, the Plan's assumptions do not reflect a higher level of natural household formation rate, which may currently be suppressed due to a lack of housing or house prices more generally. Looking at historic rates of delivery could therefore become a self-fulfilling prophecy in that historic suppressed growth and/or suppressed household formation rates could be used to feed into justification for any subsequent strategies and serve to further suppress latent growth.
- 2.14 The LP2040 is **not consistent with national policy** because it does not plan for sufficient housing to meet future needs and does not proactively plan for any uplift as a result of the Arc Framework. It remains our view that a higher housing figure beyond the Local Housing Need Figure (which is intended to be a minimum figure within the PPG) should be planned for within the LP2040 in order to ensure a sound Plan.
- 2.15 Notwithstanding concerns relating to the delivery of the quantum of the housing proposed as discussed later within these representations, it is further noted that the Council have provided only a 5% buffer. Given the reliance on difficult to deliver strategic sites which are highly likely to be delayed, as discussed within these representations, the Council at a very minimum should be seeking to provide a 10% buffer to ensure delivery, by ensuring choice and competition in the market. As set out below, the Council's current approach monopolises housing land within Bedford to a select few landowners, which allows them to control price and delivery rates in a manner which suits them, not necessarily which delivers the quantum of housing Bedford needs.

Timing of housing growth

- 2.16 The stepped trajectory is proposed as follows:
- 5 years 970 dpa = 4,850 dwellings during the period 20/21-24/25
 - 5 years 1,050 dpa = 5,250 dwellings during the period 25/26-29/30
 - 10 years 1,700 dpa = 17,000 dwellings during the period 30/31-39/40
 - 20 years average = 1,355 dwellings during period 20/21-39/40
- 2.17 The stepped trajectory as proposed results in the delivery of 4,850 dwellings in the first 5 years (970 per annum), 5,250 in the next 5 years (1,050 per annum) equating to 10,100 dwellings in the first 10 years. This then dramatically steps up to 1,700 dwellings per annum over the final 10 years equating to 17,000 dwellings. This is an almost 70% increase from the requirement in the first 10 years of the Plan period to the requirement for the latter 10 years. To deliver this quantum of housing, the Council is relying on undeliverable levels of growth on the two strategic new settlement allocations (Kempston Hardwick and Little Barford) as discussed below.
- 2.18 Paragraph 4.27 of the emerging Plan advises that there is limited opportunity to bring forward additional sites in the early years of the Plan period due to the requirements for the delivery of strategic sites and the inter reliance on new development and the completion of major infrastructure projects which is why the stepped trajectory is required with significant growth pushed back to the latter part of the Plan period.
- 2.19 The approach oversimplifies matters and fails to recognise the latent capacity within the wider Plan area for existing sustainable settlements to deliver growth through smaller sustainable sites; which collectively could deliver a significant quantum of supply. Crucially, this supply can be front loaded in the Plan period, as sites within the smaller sustainable settlements are generally 'shovel ready', essentially meaning following allocation housebuilders are able to start quickly and deliver quickly. In addition to this, the delivery of such sites ensures the Council's overall housing portfolio is varied, appealing to both a wide range of housebuilders and housing markets, thus ensuring the greatest choice and competition in the market, which ultimately drives delivery whilst protecting the continued over inflation of house prices. This approach also helps SME housebuilders to operate in the area.
- 2.20 The Council's own evidence, which supported the preparation of the current Local Plan, identified that the Rural Service Centres were able to deliver up to 150 dwellings in each settlement; the adopted Plan however progressed a target of only 25 to 50 dwellings to be delivered through

Neighbourhood Plans. It is clear therefore that the existing settlements have capacity to accommodate additional growth through this Plan and that there is an opportunity to allocate sustainable sites in villages such as Harrold to support the delivery of housing and importantly, support the delivery of housing in the early part of the Plan period so that housing need can be met immediately and not delayed as currently proposed. Such sites will likely be needed to ensure the Council is able to demonstrate a 5 year housing land supply on adoption of the Local Plan. This approach would further ensure a buffer should the strategic allocations/new settlements fail to deliver as anticipated, which we consider will be the case.

- 2.21 It is considered that the timing of delivery from the new settlements is overly ambitious and fails to reflect past delivery rates and evidence associated with bringing forward similar sites. The Wixams is a prime example. The site was first identified as a location for new housing in the late 1990s through the Bedfordshire Structure Plan adopted in 1997, and the Elstow New Settlement: Planning and Development Brief, adopted in September 1999. The role of the latter was to provide the framework for the submission of both the outline and reserved matters planning applications for the timely delivery of the settlement. The outline planning application for the core site was submitted in November 1999. In September 2005 the Council, in consultation with the land promoters, published and adopted The Wixams Strategic Design Guide SPD, to further guide and expedite delivery of the site. At this stage, it was anticipated that the entire development would be delivered within 15 years; this would have meant that the site would have been close to being fully built out in 2022.
- 2.22 However, despite this and the intervening 17-year period, the most recent monitoring report, confirms that only the initial phases have been completed in full with significant development still to be brought forward, despite construction commencing as far back as 2007 (15 years ago). In the case of the Wixams, it took over 9 from the submission of the outline planning application for the first delivery of housing, despite explicit policy support. Since then delivery has still been far slower than expected.
- 2.23 The Wixam's highlights the complexity associated with the delivery of new settlements. Whilst the continued delivery of the site is of course promising, the difficulty in reaching this stage, on a site within Bedford Borough, should act as a severe warning as to the obvious pitfalls associated with strategic delivery of new settlements and should be factored into the Plan's strategy and its over reliance on new settlements delivering the whole of the LHN moving forward.

2.24 Despite the significant delays associated with the delivery at Wixams and other strategic sites within Bedford, and also evidenced through other Local Plans which have acknowledged failure due over reliance on strategic sites (Charnwood, Rushcliffe, West Northamptonshire, etc), the Council have seemingly wed themselves to a strategy which once again, places an over reliance of strategic development, including new settlements. This approach is not justified and therefore not sound.

2.25 Start to Finish (Nathaniel Lichfields) reinforces the examples above and sets out that applications for schemes over 500 dwellings are unlikely to make a contribution in the first five years. This is primarily due to the complex planning issues related to both the principle of development and the detail of implementation. Where applications have been determined more quickly than the average, this is as a result of matters being substantially addressed prior to submission which, when combined with the determination period, still adds up to the same amount of time; as the report states *"there is rarely a way to short-circuit planning"*.

2.26 The NLP report goes on to state:

"Planned housing trajectories should be realistic, accounting and responding to lapse rates, lead-in times and sensible build rates. This is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and then being realistic about how fast they will deliver so that supply is maintained throughout the plan period. Because no one site is the same – and with significant variations from the average in terms of lead-in time and build rates – a sensible approach to evidence and justification is required."

2.27 Whilst the site promoter may point to more optimistic timescales, a far more cautious and evidenced approach is required, with smaller and more deliverable sites allocated to deliver immediately, in order to ensure a sound Plan.

2.28 In relation to the proposed Kempston Hardwick New Settlement (Policy HOU14), it is noted that the site has no current planning status according to the Council's online mapping. Land Registry details confirm that the site is in multiple ownership. It is not clear to what extent the landowners are in agreement as to the delivery of the site or whether there is agreement between all parties to bring the site forward. As set out above and demonstrated through the complex history associated with the Wixams, strategic scale development is difficult to deliver and takes a

significant amount of time. These difficulties are compounded when the development covers multiple land ownerships.

2.29 The Little Barford proposed allocation (Policy HOU19) appears to be within a single land ownership, but will still require significant time to deliver. The site is attached to St Neots, a town within neighbouring Huntingdonshire District. It is not clear whether Huntingdonshire have commented or agreed to this proposal. Clearly by locating development here, residents are most likely to work and spend in St Neots, not within Bedford. This therefore limits the benefits provided by this housing, without any compelling justification. Bedford's LHN should be met and development located where the need is. There is no compelling justification for the approach adopted by the Council and this is a significant concern. Not only is the delivery of the new settlements not sound, the overall approach of directing almost all of Borough's housing need to new settlements is also unjustified and fails to reflect the housing needs of the Borough as a whole. The proposed approach to the distribution of development fails to recognise the role smaller settlements, including the Rural Service Centres, play. The delivery of housing to new settlements only fails to help young people remain in the settlements where they currently live, forcing younger people and families out of villages and contributing to a lack of social diversity within existing settlements. It also fails to support the vitality and viability of existing businesses and services in rural settlements, potentially risking their ongoing operation. The approach also fails deliver a variety of housing to the housing market, preventing choice and competition as advocated in the NPPF and in the Letwin Review.

2.30 Not only is the delivery of the new settlements not sound, the overall approach of directing almost all of Borough's housing need to new settlements is also unjustified and fails to reflect the housing needs of the Borough as a whole. The proposed approach to the distribution of development fails to recognise the role smaller settlements, including the Rural Service Centres play. The delivery of housing to new settlements only fails to help young people remain in the settlements where they currently live, forcing younger people and families out of villages and contributing to a lack of social diversity within existing settlements. It also fails to support the vitality and viability of existing businesses and services in rural settlements, potentially risking their ongoing operation. The approach also fails to deliver a variety of housing to the housing market, preventing choice and competition as advocated in the NPPF and in the Letwin Review.

2.31 In relation to the new settlements, the Council's assumes delivery on these sites will be at times 1,200 dwellings per annum collectively, equating to annual delivery of 600 dwellings per annum

per site. This is highly ambitious. Nationally sites of over 2,000 dwellings only deliver on average 160 dwellings per annum. The Council's trajectory however sets out that from commencement of delivery of units in 2030/31 up to 2039/40, annual delivery rates averages 380 dwellings per annum, in excess of double the national average for similar sites over 2,000 units. It is considered highly unlikely these anticipated rates of development will occur, particularly during the Plan period. The peak delivery of 600 units per site from 2037/38 is also considered highly ambitious and not reflected in delivery rates of other similar sites nationally, let alone within Bedford.

2.32 To ensure a sound Plan allocating suitable shovel ready sites in sustainable settlements such as Harrold to deliver in the early part of the Plan period will lessen the reliance on complex sites to deliver in the latter stages of the Plan bringing delivery targets down to more reasonable and deliverable levels. This revised approach would enable the Council will deliver more homes in the short term, securing jobs and helping to slow the inflation on house prices. There will be further social benefits through the delivery of affordable housing at a time when there is an acute need. It will help maintain the viability and vitality of existing and ensure choice and competition in the market for housing assisting delivery and market absorption. It will also ensure the Council can maintain a five-year housing land supply; which currently looks to be marginal even on adoption, if it can be demonstrated at all. This approach is a fundamental risk as the Plan cannot be found sound if there is no five-year housing land supply at adoption and will weaken the plans effectiveness if Paragraph 11 is regularly engaged. Allocating sufficient sites to ensure a robust five-year housing land supply at adoption and throughout the Plan is therefore considered to be a fundamentally benefit as the Plan cannot be adopted or reasonably function without it.

Policy DS5(S) Distribution of Growth

2.33 Emerging Policy DS5 sets out where growth is to be located. It takes into account existing commitments together with the additional growth required to meet needs to 2040.

2.34 Emerging Policy DS5(S) sets out the following distribution of housing growth:

Location	Dwellings	Employment Land (ha)
Within the urban area	1,200	5
Strategic locations adjacent to the urban area which contribute to delivering the Forest of Marston Vale incorporating the Bedford Milton Keynes Waterway Park and the Bedford River Valley Park	1,500	7

Growth locations on the A421 transport corridor and with the potential for rail based growth		
- South of Bedford including new settlement (land parcels at Wixams, Shortstown and Elstow)	7,050	70
- Little Barford new settlement	3,800	4
- Other employment sites	-	50
Some development will take place beyond the plan period	400	
Remaining rural area / villages (including Harrold)	Completion of sites previously allocated in local plans and neighbourhood plans	

2.35 As detailed in response to Policy DS2 it is considered that the Council's preferred strategy is over reliant on strategic sites and new settlements and is not sound. The approach proposed risks the delivery of the Plan as it is highly vulnerable to delayed or non-delivery. If one of the strategic sites does not deliver than the Plan will fail. Further, the approach adopted by the Council does not provide for choice and competition in the housing land market, which is likely to result in land price inflation given most the new housing is under the control of a limited number of landowners. Moreover, it largely rules out developments being brought forward by SME housebuilders, instead creating a monopoly of sites which can likely only be delivered by the larger housebuilders who will benefit from the economies of scale. As a result, there will also be a limited variety of houses realising to the market concurrently, slowing market absorption which will have high consequences in the latter years of the Plan period in terms of satisfying the Housing Delivery Test or demonstrating a five-year housing land supply.

2.36 The Plan states that there will continue to be growth in villages as a result of policies in the Local Plan 2030 which allocated growth to some Key Service Centres and Rural Service Centres however, no new/additional allocations are made in these villages in the Local Plan 2040.

2.37 The Plan instead advises that some Parish Councils may 'choose' to allocate further sites for development in their Neighbourhood Plan; there is no requirement for this.

2.38 This absence of small and medium growth in the rural villages misses an opportunity to deliver some of the housing requirement earlier in the Plan period, rather than relying on some 10,000 dwellings to be delivered through new settlements - which are significantly reliant on the delivery of large-scale infrastructure. As detailed in response to Policy DS3 it is not an appropriate strategy to place such a reliance on strategic infrastructure to deliver such a large proportion of a housing need.

- 2.39 The evidence base which supported the previous Local Plan 2030 and initial consultations of that Local Plan confirmed that there is capacity within the smaller settlements to deliver a higher quantum of growth than was adopted through the Plan (up to 150 dwellings in each settlement rather than the 25 – 50 dwellings detailed within the Plan). The Plan states that it is not possible to provide additional housing in the early years of the Plan period, but this is not justified. Its own evidence has clearly demonstrated that settlements such as Harrold are suitable for a higher quantum of growth than currently being delivered under the adopted Plan.
- 2.40 The distribution of growth within the LP2040 is **not effective**. As detailed in response to Policy DS3, such a reliance on strategic sites is not be deliverable over the Plan period (it is already noted in policy DS5(S) that 400 dwellings will be delivered beyond the plan period, before accounting for any delays in site assembly, unlocking and delivering the required infrastructure, and actually delivering homes on sites included within the plan period).

Policy DM5 – Self-build and Custom Housebuilding

- 2.41 Emerging policy DM5 requires an element of self-build plots to be provided on all sites other than developments of 1 – 4 dwellings. Land west of Odell Road, Harrold has the potential to deliver up to 60 dwellings and theoretically, using the current draft policy, would be expected to provide 5 self-build plots.
- 2.42 There are issues with providing self-build plots within standard open market sites in terms of achieving a comprehensive design and issues with who is responsible for installing utilities (and to what point). There is also the risk that plots will sit undeveloped for long periods of time if they are not sold, whilst the required marketing and viability evidence is gathered in the result that demand is low or non-existent in a location.
- 2.43 The Self-Build and Custom Housebuilding Topic Paper (April 2022) identifies that through the current allocations and self-build projections, there is capacity to deliver 644 self-build plots. The Topic Paper also notes that there are currently 90 people on the self-build register. The provision of 644 self-build plots through the Local Plan 2040 is significantly above the current demand.
- 2.44 The policy should be re-worded to **encourage** the inclusion of self-build plots rather than require them. In its current form it is too prescriptive and will lead to issues with overall site completion.

It will also lead to a significant surplus in the provision of self-build plots for which there is unlikely to be what would need to a 7-fold increase in demand over the plan-period (from 90 to 644). This surplus of self-build plots will lead to the Council using more of their valuable time assessing numerous marketing and viability reports in order to meet the requirements of Policy DM5 to seek to change them to standard market housing plots when it transpires that demand is low.

3 Land to the west of Odell Road, Harrold – Site Assessment

- 3.1 The Housing and Employment Land Availability Assessment and Site Assessment Topic Paper (May 2022) includes the Council's assessments of the sites submitted for consideration throughout this Local Plan process.
- 3.2 A copy of the assessment for Land to the west of Odell Road, Harrold is provided below, with our suggested amended assessment where relevant which is based on technical assessment that have been carried out.

Criteria	Council's Assessment	Applicant's Amended Assessment
Within or adjoining UAB SPA or built form of a small settlement?	?	+ The site adjoins Harrold, particularly when regard is had for the adjacent Neighbourhood Plan allocation.
Accessible on foot to a food store?	+	+
Accessible on foot to a primary school?	+	+
Accessible on foot or by bus to a major employer?	x	x
Outside, adjoining or within the air quality management area?	+	+
Within or adjoining site of nature conservation importance?	x	x
In an area where protected species are known or likely to exist?	xx	0 An Ecological Impact Assessment has been carried out which shows the site can be delivered without unacceptable impact on protected species.
Potentially able to achieve a net gain in biodiversity?	?	+ There are opportunities to provide a net gain in biodiversity and the levels achievable on site are currently being explored. It is considered that the site

Criteria	Council's Assessment	Applicant's Amended Assessment
		will be able to deliver the 10% required, if not greater.
Able to link into the green infrastructure opportunity network?	0	+ Ownership includes Harrold Lake and offers the opportunity for connections to this blue/green infrastructure asset.
Likely to impact on an area currently providing ecosystem services?	X (*opportunity area for 3 or more ecosystem services covers the site*)	0 Ecological evidence produced in support of the site demonstrates the proposed development will not result in any unacceptable impacts on important ecological features. With Biodiversity Net Gain requirements the site cannot be delivered without providing a substantive and demonstrable improvement to local ecosystem services.
Proposing a renewable energy scheme or extra energy efficiency standards?	0	+ There is potential to incorporate renewable energy and energy efficiency measures through the scheme, particularly in light of the new building regulation requirements.
Likely to impact on designated or non-designated heritage assets or their settings?	X	0 As demonstrated in the archaeological and heritage assessment submitted with the previous application and provided with previous representations, there will be no unacceptable impact on Harrold's conservation area. As such the impact is considered to be at worse neutral.
Likely to increase future economic and employment opportunities?	0	+ Jobs will be created during the construction and sale phases.

Criteria	Council's Assessment	Applicant's Amended Assessment
Proposing a main town centre use in, on the edge or outside of a town centre?	0	0
Within 400m of an existing open space or proposing open space within it?	X	+ There is potential for public open space to be provided on site, particularly linked with neighbouring Lake Harrold which will provide an attractive setting.
Within 800m of a sports facility or proposing a sports facility within it?	X	X
Likely to have a significant adverse impact on the surrounding landscape?	?	+ As demonstrated by submitted LVIA the development proposed will not have an adverse impact on the surrounding landscape and that the site is well related to the existing development.
Within the existing settlement form?	+	+
On previously developed land?	X	X
On best and most versatile agricultural land i.e., grades, 1, 2 or 3a?	?	X The site is Grade 3a
Within a groundwater source protection zone?	+	+
At risk of flooding?	XX	+ Site contains areas of Flood Zone 3, however these areas will form part of the sites open space/ecology/landscape strategy and will not contain built form, which will be restricted to the areas of the site within Flood Zone 1.
Likely to provide a mix of housing, including affordable housing?	+	+
Able to address a particular housing need?	X	? Opportunity to meet specific needs on the site.

Criteria	Council's Assessment	Applicant's Amended Assessment
Within 800m of a facility where cultural or social activities can be accessed?	X	X
Likely to encourage social cohesion?	0	+ The development would contribute to and expand on an existing community and would raise opportunities for social interaction.
Likely to help make the area safer?	+	+
Connect highway without constraint?	+	+ No highway constraints as confirmed by historic application.
Highway or junction capacity issues	+	+ A safe access can be achieved into the site from Odell Road.

3.3 With the above in mind, it is clear that Land west of Odell Road, Harrold is better suited to come forward for residential development than actually assessed by the Council. Copies of the available technical information have been submitted in support of planning application 19/00842/MAO and demonstrate the sites acceptability. In particular it is further noted that part of the site previously promoted is now allocated for development within the Harrold Neighbourhood Plan, further demonstrating the acceptability of development in this location.

4 Conclusions

4.1 This representation has been prepared on behalf of [REDACTED] in respect of their land interests at Land to the west of Odell Road, Harrold.

4.2 To conclude:

- The LP2040 is **not consistent with national policy** because it does not plan for sufficient housing to meet future needs and does not proactively plan for any uplift as a result of the Arc Framework.
- The distribution of growth within the LP2040 is **not effective or justified** as the level of growth expected on the strategic sites, particularly the new settlements are not reflective of historic delivery within Bedford or nationally when compared to other similar sites. The Council has assumed delivery rates of up 600 dwellings per annum on the Kempston Hardwick and Little Barford allocations (1,200 per annum in total), equating to an average annual deliver of 380 dwellings per annum on strategic allocations (760 dwellings per annum in total), wherein evidence suggests average delivery closer to 160 per annum per site is likely to be deliverable (320 per annum in total), having a significant impact on the deliverability of the proposed stepped trajectory.
- The Spatial Strategy is **not justified** because it has not fully taken account of all the reasonable alternatives, most notably option 2D. There is also no justification for not including a requirement for neighbourhood plans to make allocations beyond those already committed to 2030.
- It is considered unlikely that the Council can demonstrate a robust five-year housing land supply at adoption, nor throughout much of the Plan period, even if the hyper ambitious assumptions made by the Council are realised.
- Policy DM5 **should be re-worded** to encourage the inclusion of self-build plots rather than require them. In its current form it is too prescriptive and will lead to issues with overall site completion. It will also lead to a significant surplus in the provision of self-build plots for which there is unlikely to be what would need to a 7-fold increase in demand over the plan-period (from 90 to 644).
- Land west of Odell Road, Harrold is a suitable site for development and should be included in an **uplift of housing growth** beyond that already proposed in the LP2040. This uplift should comprise of **sustainable rural growth** to allow housing to be delivered earlier in the plan period.

4.3 We politely request that we are kept informed of the progress on the LP2040 including the need to attend any relevant Hearing sessions for the Examination of the Plan.