



dynamic development solutions™

For and on behalf of
Bedfordia Developments Ltd

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

Land at Station Road, Oakley

**Prepared by
DLP Planning Ltd
Bedford**

September 2021





Prepared by:	[Redacted]
Approved by:	[Redacted]
Date:	September 2021

DLP Planning Ltd
4 Abbey Court
Fraser Road
Priory Business Park
Bedford
MK44 3WH

Tel: 01234 832740

DLP Consulting Group disclaims any responsibility to the client and others in respect of matters outside the scope of this report. This report has been prepared with reasonable skill, care, and diligence. This report is confidential to the client and DLP Planning Ltd accepts no responsibility of whatsoever nature to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk.

CONTENTS	PAGE
1.0 Introduction and Structure of Representations.....	5
2.0 Background to the Local Plan Review and Its Relationship with National Policy and Other Material Considerations	8
3.0 Representations – Draft Plan Scope, Vision and Objectives	13
Paragraph 1.5 (proposed plan period)– Object	13
Paragraph 1.10 (alignment with the Spatial Framework) – Comment.....	14
Paragraph 1.11 and Paragraphs 3.1 – 3.3 (Local Housing Need and Levels of Growth)– Comment	15
Paragraph 1.14 (Scope of the Plan) – Object.....	17
Paragraphs 1.47-1.48 (Neighbourhood Planning) – Object.....	18
Section 2 (Draft Vision) – Object.....	21
4.0 Representations – Growth and Spatial Strategy Options.....	23
Comments on the Strategy Options and Supporting Evidence	23
Preferred Options of Local Plan 2040 (pages 20-23) - Objection	23
<i>Paragraph 1.45 - The Council's Approach to the Assessing Settlement Hierarchy – Objection</i>	<i>25</i>
<i>Paragraphs 3.10, 3.16 and 3.17 of the Bedford Borough Local Plan 2040 - Objection..</i>	<i>31</i>
Paragraphs 3.10 and Preferred Options 2a-2d: Component of Rail-Based Growth 'Pink' Growth Strategy Options) – Object.....	33
Paragraphs 3.26 – 3.28 (Small Sites) – Object	38
Paragraphs 3.12 and Table 1 (Evidence Base) AECOM Transport Model: Highways Strategy – Object.....	40
5.0 Proposed Appropriate Strategy Alternative – A 'Hybrid' Approach.....	43
6.0 Delivery Assessment and Proposed Stepped Trajectory.....	47
Paragraphs 3.4 – 3.5 (Spatial Strategy – Proposed Stepped Trajectory) – Object	47
7.0 Site Opportunity and Response to Site Assessment Pro-Forma (Call for Sites ID: 839).....	50
Introduction to Site and Proposals	50
Proposed Development Option	52
Response to Borough Council's Site Assessment Pro-Forma and Neighbourhood Plan Assessment.....	54
Site Assessment Pro-forma (ID:839 / ID: 832) – Objection.....	54
Suggested Alternative Site Assessment Finding	56

APPENDICES

- Appendix 1 Location Plan (Land East of Station Road (ID: 832 / ID: 839))**
- Appendix 2 Land East of Station Road Indicative Masterplan (ID: 832 / 839)**
- Appendix 3 Bedford Local Plan 2030 Delivery Assessment**
- Appendix 4 Review of Draft Sustainability Appraisal Findings obo Bedfordia Property**
- Appendix 5 Review of the AECOM “Bedford Borough Transport Model” – SDD Consultants**

1.0 INTRODUCTION AND STRUCTURE OF REPRESENTATIONS

- 1.1 These representations to the ‘Bedford Local Plan 2040 – Draft Plan Strategy Options and Draft Policies (Regulation 18) Consultation’ have been prepared by the DLP Planning Ltd (DLP) acting on behalf of the Bedfordshire Charitable Trust and Bedfordia Property.
- 1.2 Our clients’ interests East of Station Road, Oakley, have been extensively promoted over several years, commencing in 2014 at the outset of preparation of the current Bedford Local Plan 2030, with part of the land eventually allocated within the Oakley Neighbourhood Plan. Details were re-submitted to the Council as part of the Summer 2020 Call for Sites Consultation.
- 1.3 The details submitted illustrate the opportunity for a sustainable contribution towards an appropriate spatial strategy that would justify Oakley’s reclassification as a Key Service Centre in reflection of its location and function, and it making a valuable contribution towards the increased needs for development. The land provides an opportunity to provide for a carefully considered mixed residential development area, including much needed improvements to the Lincroft Academy and a revised vehicular access/road system that will create a new dedicated access to the school and relieve existing pressures in the area and a new access distributor road.
- 1.4 This Report addresses the Council’s consultation proposals and identifies that its Preferred Strategy Options, if pursued, will not provide the basis for a sound or legally compliant strategy. In order to satisfy the requirements for immediate review, including addressing the increase in housing need and the area’s wider priorities, a ‘hybrid’ strategy must be pursued to avoid an effective embargo on further ‘village-related’ growth outside of the A421 corridor.
- 1.5 The ‘hybrid’ strategy endorsed in these representations corresponds to our client’s wider interests in the borough, subject of separate submissions:
- **Land at School Approach and Land east of Odell Road, Sharnbrook** (ID: 918 / ID: 932) – provision for up to 500 dwellings as part of comprehensive Masterplan Proposals incorporating new Green Infrastructure and community facilities
 - **Land East of Station Road, Oakley** (Site ID: 832 / 839) – provision of c.250 dwellings together with substantial benefits to community facilities and highways infrastructure
 - **Land at Marsh Lane/Rushden Road, Milton Ernest** (Site ID: 910) – relating to land proposed for allocation within the emerging Neighbourhood Plan, identifying

opportunities to contribute towards additional needs for development

- **Land at Green End, Kempston** (Site ID: 1247) – located within the ‘south’ corridor parishes to provide growth well-related to the urban area including scope to make provision for specialist accommodation for older people
- **Land at Rushden Road, Milton Ernest** (Site ID: 852) – supporting the intensification and enhancement of existing commercial floorspace
- **Land at Highfield Road, Oakley** (Site ID: 1000) – providing opportunities for economic development and jobs growth adjacent existing employment provision
- **Land at Radwell Lakes, Moor Lane, Radwell** (Site ID: 703) – for the purposes of tourism, leisure, and recreation to support a prosperous rural economy
- **Land off Memorial Lane, Felmersham** (Site ID: 827) – supporting growth of between 10-30 dwellings over the plan period at this defined settlement
- **Land at Town Farm, Stocking Lane, Souldrop** (Site ID: 1245) – supporting growth of c.10 dwellings over the plan period at this defined settlement through the re-use or redevelopment of existing agricultural buildings and hardstandings
- **Manor Farm, Knotting** (Site ID: 633) – supporting the re-use or redevelopment of redundant agricultural buildings

1.6 Our client’s combined opportunities summarised above are individually and collectively consistent with the ‘**hybrid**’ approach endorsed on their behalf. Each should thus be subject to further detailed testing as part of strategy options and for the purposes of site selection.

1.7 Modifications are suggested to enable preparation of a version of the draft Local Plan 2040 that addresses the issues identified, ahead of further consultation and subsequent Submission and Examination.

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

- **Section 2** provides a background to the Local Plan Review and its relationship to national policy and other material considerations
- **Section 3** provides representations on the overarching Vision, Objectives and Scope of the Local Plan 2040
- **Section 4** provides comments on the Strategy Options subject to consultation
- **Section 5** summarises analysis of the Council’s draft Sustainability Appraisal including inconsistencies with the testing of Preferred Options and the reasons to identify a ‘hybrid’ approach as an appropriate strategy to adopt
- **Section 6** summarises why the Council’s proposed ‘stepped approach’ is incapable of satisfying national policy and guidance, having regard to local evidence of supply
- **Section 7** comprises our review of the Council’s draft Site Assessment Proforma and a summary of our client’s interests that support their selection for allocation as part of the strategy

- 1.9 These representations should be read in parallel with those prepared on behalf of the Cambridge Meridian Academies Trust (CMAT) which seek recognition within the plan-making process of the significant increase in the pupil roll be accommodated through the expansion of Lincroft Academy. These representations support the proposed reclassification of Oakley as a Key Service Centre and endorse the further assessment of potential benefits that would result from the reconfiguration of the current land uses East of Station Road.

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

Summary of Local Plan 2030 and Requirement for Immediate Review

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

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

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

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

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

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

National Policy and Guidance

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

over a minimum 15-year period from adoption and anticipate long-term requirements. This is a significant change from paragraph 157 of the 2012 Framework that specified that policies should be drawn up over an appropriate timeframe and only preferably a 15-year horizon.

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

(ID: 2a-010-20201216).

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

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

Emerging Oxford Cambridge Arc Spatial Framework

- 2.17 The proposed Oxford-Cambridge Spatial Framework will likely have the status of national policy and is intended to form a material consideration for plan-making alongside the National Planning Policy Framework.
- 2.18 The Government is currently seeking view on priorities for the Spatial Framework as part of consultation on the document ‘Creating a Vision for the Oxford-Cambridge Arc’ (until October

2021). The latest consultation proposals set out that it will aim to guide sustainable planning and investment decisions under four policy pillars:

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

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

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

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

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

3.0 REPRESENTATIONS – DRAFT PLAN SCOPE, VISION AND OBJECTIVES

Comments on the Proposed Approach and Supporting Evidence

- 3.1 The section of the representations provides observations on the soundness of the Council's overall approach towards preparation of the Local Plan 2040 and identification of the strategic priorities it is required to address.

Paragraph 1.5 (proposed plan period)– Object

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

Reasoning

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

Remedy

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

be profiled to look further ahead to 2050, this reflecting the likely timescales required by large scale development.

- 3.8 This reemphasises that in terms of the soundness requirements for preparation of the Local Plan 2040 the Council's proposed approach must also fully embrace those sustainable opportunities to meet the increased requirements for growth in the immediate term and enable this through the prioritisation of suitable and deliverable sites as part of a 'hybrid' strategy.

Paragraph 1.10 (alignment with the Spatial Framework) – Comment

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

Reasoning

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

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

- 3.12 Paragraph 4.4 also states the importance of recognising the needs of an ageing population in terms of service delivery. At Paragraph 4.5 the document goes on to explain:

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

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

Remedy

- 3.14 The Council’s Preferred Options consultation proposals offer no scope to address these local requirements for place-making and connectivity as part of a comprehensive ‘hybrid’ strategy. This is as a result of identifying no requirement for additional village-related growth outside of the ‘east’ or ‘south’ transport corridor parishes. Opportunities for sustainable development in accordance with these requirements (and the objectives of the emerging Spatial Framework) must be embraced both in the period to 2030 (to address the immediate uplift in the need for growth) and across the entire Plan period to sustain the role and function of the Borough’s most sustainable settlements.

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

- 3.15 Paragraph 61 of the NPPF2021 confirms that minimum annual local housing need calculated in accordance with the Government’s Standard Method provides the starting point for assessment of the number of homes to be provided through plan-making. Positive plan-making should address those circumstances where it may be appropriate to make provision for a higher number of new homes than indicated by the result of the Standard Method (with a non-exhaustive list of potential reasons summarised in the Planning Practice Guidance at ID: 2a-010-20201216).
- 3.16 It is apparent from paragraphs 1.11 and 3.1 to 3.3 of the Council’s consultation proposals that the Council has not considered potential reasons to plan for a higher housing number as part of the current process. Instead, it has only tested an arbitrary 10% uplift to the

calculation of LHN within the draft Sustainability Appraisal process. This approach is contrary to material considerations (including the Council's own evidence base) that require more detailed assessment before selecting options for the submission draft Plan and setting the housing requirement in the Plan.

Reasoning

3.17 Paragraph 3.4 of the consultation document 'Creating a Vision for the Oxford-Cambridge Arc' refers to the importance of the role of the NPPF to deliver the economic pillar of objectives for the corridor. In principle this reflects use of the Standard Method as the expected starting point to identify housing needs within the Arc but further reflects observations in the initial consultation and the role of the PPG that may necessitate delivery of higher levels of housing, setting out considerations such as:

- *“developing an Economic Strategy, supported by strong economic evidence, to identify the policies, locations and investment needed to deliver the Arc’s potential for sustainable and green economic growth; and*
- *setting policies to make sure growth is felt by all communities and the Arc becomes a better place to live and work for all, such as by providing more housing in the right places, making sure people can move around by public transport and other infrastructure, and enhancing the Arc’s natural capital”*

3.18 The main implication of this component of the Arc Spatial Framework reflects circumstances where the calculation of local housing need will not result in sufficient workers in the right locations to achieve the full potential of sustainable patterns of economic development.

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

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

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

scenarios (that may result in a higher demand for labour)

Remedy

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

Paragraph 1.14 (Scope of the Plan) – Object

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

Reasoning

- 3.23 As set out in the Spatial Framework consultation document (paragraph 5.5) the Arc demonstrates poor affordability where development has not kept pace with need. That is exactly the position in Bedford resulting from the approach adopted in the Local Plan 2030.
- 3.24 This means (at paragraph 5.7) it is an aim of the Framework to ensure that the Framework sets policies to enable ***housing needs to be met in full, including much-needed affordable housing***
- 3.25 This sits alongside strategic decisions where direction will be provided by the Framework e.g., implementation of East-West Rail, identification of Opportunity Areas and support for the delivery of previously developed land.
- 3.26 What this means in practice is that prioritizing opportunities to meet full development needs is an important component of the place-making pillar as part of a joined-up approach providing for sustainable communities.

- 3.27 The Council's Preferred Options consultation proposals would sustain a very substantial shortfall against minimum annual local housing need until at least 2030. Due to only considering a horizon to 2040 and as a result of likely timescales for the characteristics of larger-scale development (including new settlements) it is furthermore highly likely a significant shortfall against full development needs will persist until 2040 and beyond.
- 3.28 The Council's proposed strategy offers no flexibility and choice to address the current and persistent failure to meet needs in full. Our assessment indicates that current levels of development are likely to become significantly constrained substantially before any of the longer-term solutions proposed as part of the Preferred Options achieve significant delivery. Realistic assumptions must also be made in relation to new larger-scale developments.

Paragraphs 1.47-1.48 (Neighbourhood Planning) – Object

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

Reasoning

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

- 3.31 Paragraph 1.47 of the consultation proposals repeats the strategy outlined in Policy 4S of the adopted Local Plan. This does not confirm a realistic prospect that all 2,260 units will be delivered before 2030. There are outstanding objections to several of the emerging Neighbourhood Plans at several Key Service Centres.
- 3.32 At paragraph 1.48 the Borough Council only provides vague indications of where further

engagement might take place with parish councils to meet additional requirements for growth where a range of suitable sites are identified.

- 3.33 This paragraph is inconsistent with the intentions for a stepped trajectory and the NPPG for reviewing NDPs (which should encourage early review when strategic policies have changed). That is an inevitable consequence of the Development Plan in Bedford given its current failure to address levels of growth in accordance with the Standard Method. The Borough Council's own evidence indicates the strong likelihood of sites where early delivery can be prioritised. This does not demand that meeting increased requirements for growth should extend beyond 2030.
- 3.34 Paragraph 28 of the NPPF2021 reaffirms the role for Neighbourhood Plans in providing for non-strategic allocations. Paragraph 29 confirms this must be within the context of Neighbourhood Plans that do not promote less development than set out in adopted strategy policies (which in this case will be replaced in the Local Plan 2040). Paragraph 66 of the NPPF2021 outlines that strategic policies should set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. This is an important distinction from the 2012 version of the Framework. However, the Council's testing of options for the Local Plan 2040 rolls forward a 'one-size fits all' distribution of potential levels of growth in Key Service Centres and Rural Service Centres.
- 3.35 This fundamentally fails to accord with the current requirements of national policy and guidance and, importantly, has currently precluded the Council from considering 'hybrid' alternatives to the spatial strategy that would allow appropriate levels of sustainable development to be prioritised across the settlement hierarchy.

(ii) Identification of Housing Requirements for Designated Neighbourhood Areas

- 3.36 The Council's proposed approach is contrary to paragraphs 66 and 67 of the NPPF2021. Paragraph 66 sets out that strategic policies should also 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. The Council's suggestion of rolling forward the contribution from the scale and distribution of growth identified in Policy 4S of the LP2030 is not justified and not positively prepared.

3.37 This is an important component of national policy and guidance in terms of seeking to avoid conflict between existing and emerging Neighbourhood Plans and the strategic policies of the Development Plan. This should form part of positive discussions between qualifying bodies and the local planning authority, recognises the ability of Neighbourhood Plans to sustain and increase housing delivery. Any indicative requirement figure would take into consideration relevant policies such as an existing or emerging spatial strategy, alongside the characteristics of the Neighbourhood Plan area and should minimise the risk of Neighbourhood Plan figures being superseded when new strategic policies are adopted (ID: 41-102-20190509).

3.38 The figures in Policy 4S of the LP2030 are a flawed basis for rolling forward potential requirements against which Neighbourhood Plans are prepared for the following reasons:

- The figures were determined arbitrarily, without reference to the OAN in place at the time or strategies for individual settlements;
- In any event the Council's OAN knowingly represented a significant shortfall against the Government's policy for calculating housing need, culminating in this immediate review;
- The figures are applicable only in the context of a foreshortened plan period to 2030; and
- Figures are provided only for certain settlements, with no requirement indicated for levels of the settlement hierarchy below Rural Service Centres (despite these having been considered in earlier rounds of plan-making for the LP2030).

3.39 It follows that the process for calculation of any indicative requirement would therefore materially and significantly exceed the evidence base for the LP2030 and the figures in Policy 4S. By extension this means that any evidence produced by groups preparing Plans (for example assessments of local rural housing needs) whether relating to settlements listed in Policy 4S or not) would need to be considered in the context of the overall result of the Standard Method to 2040.

3.40 Any impacts upon the evidence based for emerging Neighbourhood Plans must be read alongside PPG ID: 41-084-20190509, which answers the question 'when will it be necessary to review and update a Neighbourhood Plan' and states in relation to the above issues:

"There is no requirement to review or update a Neighbourhood Plan. However, policies in a Neighbourhood Plan may become out of date, for example if they conflict with policies in a Local Plan covering the neighbourhood area that is adopted after the making of the

Neighbourhood Plan. In such cases, the more recent plan policy takes precedence.”

Remedy

- 3.41 The solution to issues identified in these representations necessitates the Council complying with the requirements of paragraphs 66 and 67 of the NPPF2021. In doing so, we consider that a ‘hybrid’ development strategy must remain supported throughout the Plan period, including recognition of the contribution that this would make towards the shortfall against local housing need for the period 2020 to 2030 i.e., through ‘top up allocations’.
- 3.42 Without prejudice to any specific conclusions from this work this would support inclusion of ‘village-related’ development as a component of future growth. There may be scope to alter the distribution of the housing requirement to individual Key Service Centres or Rural Service Centres upwards or downwards from the arbitrary figures adopted by the Council, depending on the capacity and other potential benefits for development in these settlements relative to their overall potential contribution to LHN. A clear exception is relevant at Oakley, based on the requirement for its reclassification as a Key Service Centre where the levels of development achievable on our client’s site would be appropriate.

Section 2 (Draft Vision) – Object

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

Reasoning

- 3.44 The draft Vision sets out:

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

- 3.45 This aspect of the Vision will not be achieved in the context of the Council’s Preferred Options omitting a significant number of the Borough’s KSCs and RSCs from the spatial strategy and do not seek to provide for the additional development required to secure balanced communities.

3.46 The Vision further states:

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

3.47 This would imply a requirement for additional growth, which the preferred options exclude for a significant number of centres. The draft Vision fails to address that it is part of the role of the Local Plan review (and resulting updates) to address strategic priorities deferred as a consequence of the Local Plan 2030 (for example expansion of primary healthcare and secondary education). The Vision also fails to reflect that the proposed development strategy is not looking to provide for any additional growth in rural areas as part of an uplift to meet housing needs in full before 2030. This is a significant shortcoming of the strategy and overlooks suitable and deliverable sites that could be prioritised now to meet these increased needs alongside the delivery of other substantial benefits.

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

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

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

3.49 The principle of these objectives is supported but is reliant on flexibly supporting diverse opportunities for development across the settlement hierarchy. There are a substantial number of centres where the level of development identified is insufficient to secure the opportunities identified or, as in the case of Oakley, to provide for a long-term strategy for improvement of the facilities at Lincroft Academy.

4.0 REPRESENTATIONS – GROWTH AND SPATIAL STRATEGY OPTIONS

Comments on the Strategy Options and Supporting Evidence

- 4.1 The section of the representations provides observations on the soundness of the Council's overall approach towards preparation of the Local Plan 2040 and identification of the strategic priorities it is required to address. Comments specifically relate to Chapter 3 of the consultation document. Issues relating to the ability of the Council's approach to maintain a rolling five year supply of deliverable sites (including as part of its proposed use of a 'stepped trajectory') are dealt with separately in Section 6.

Preferred Options of Local Plan 2040 (pages 20-23) - Objection

- 4.2 The preferred options for development, as set out in the Draft Local Plan, focus the allocation of a minimum 12,500 units around the urban area of Bedford, the A421 and the A1 transport corridors. This approach is unsound (not effective, not justified, not positively prepared and not consistent with national policy) in creating an effective embargo on any further consideration of village-related growth outside of these areas as part of the Council's Plan-making process to prepare strategic policies or to necessitate the review of Neighbourhood Plans that look forward only to 2030.

Reasoning

- 4.3 Whilst we are in support of parts of the Council's 'Preferred Options' 2a-2d, insofar that they recognise the potential for benefits from what is in effect village-related growth at some Key Service Centres (KSC) and Rural Service Centres (RSC), we note the absence of any development being allocated to the northern parishes.
- 4.4 KSC's and RSC's outside of the 'east' and 'south' corridors are capable of delivering development within the Plan period up to 2040 and addressing the significant increase in housing need that must now be planned for. The evidence bases for emerging Neighbourhood Plans and details of suitable sites being identified in the Call for Sites event that Bedford Borough Council undertook in the Summer of 2020 are illustrative of this fact.
- 4.5 The expectation for further opportunities for development being assessed as part of the review of strategic policies in the Local Plan 2040 applies especially to Oakley, currently designated as a Rural Service Centre. The 'made' Neighbourhood Plan (following a successful referendum on the 27th of February 2020) covers the period to 2030, albeit in the

context of the existing settlement hierarchy and the lower objectively assessed need addressed in the LP2030. The Neighbourhood Plan expressly recognises the current and future land use and operational requirements of Lincroft Academy, the separation of the existing playing fields from the building campus and the potential for reorganisation to support the growth and efficient functioning of the school.

- 4.6 The Oakley Neighbourhood Plan further notes that the requirements of existing organisations should be considering when assessing future proposals for development. These circumstances, over and above Oakley’s existing designation as a Rural Service Centre demonstrate that it both has suitable provision of services and facilities to facilitate development and is sustainably located relative to other facilities and services (in Clapham and in the Bedford urban area). This means it would be patently unsound to exclude the settlement from a contribution towards an appropriate strategy for the Borough.

Remedy

- 4.7 Therefore, we would require that Bedford Borough Council addresses their proposed development strategy and seek to allocate development within the northern KSC and RSC, where there is both demand for development and the available sites to aid in the delivery of housing post 2030 or earlier. This could be achieved through allocating additional development to the northern parishes (as part of flexibility and contingency) or redistributing the minimum total of additional land to be allocated to address local housing need (and thus addresses barriers to delivery of large-scale strategic growth within the Preferred Options).

Paragraph 1.45 - The Council's Approach to the Assessing Settlement Hierarchy – Objection

Reasoning

- 4.8 The Council's work to justify the selected Preferred Options is at a relatively early stage with significant 'gaps' in the evidence presented – particularly in terms of development timescales, infrastructure delivery and viability. The Council notes, as follows:
- Infrastructure Delivery Plan – to be prepared alongside site allocations
 - Settlement Hierarchy (September 2018) – review underway
 - Plan-wide Viability Assessment – yet to be commissioned
- 4.9 The absence of these documents, and in-particular completion of the review of the Settlement Hierarchy, means that the exclusion of Oakley from the Council's Preferred Options can be demonstrated to be unsound – not effective, not consistent with national policy and not justified.
- 4.10 The Council's approach to the assessment of the existing settlement hierarchy is flawed as it fails to consider the proximity of services and facilities in neighbouring areas which fall within the prescribed distances. This is particularly relevant for Oakley, which is well positioned to take a greater level of growth given its inherent sustainability and the options for development available.
- 4.11 Oakley, in spatial terms, is a highly sustainable location and appears wrongly classified in the Plan, notwithstanding our broader concerns over the apportionment of housing numbers and the deferral of site identification to Neighbourhood Plans. Oakley, as noted, is very well connected to both Clapham (a Key Service Centre some 600 metres distant) and Bedford and is well served by public transport.
- 4.12 Oakley includes local shopping, significant employment opportunities and has both primary and secondary education provision. As such, Oakley serves a wider catchment area and, in this context, it is a reasonable alternative to consider a higher level of growth than the 25-50 homes band proposed under the adopted plan.
- 4.13 The key issue with the Council's approach is that only limited weight was given to the provision of secondary education, as opposed to primary education in developing the evidence base for the Settlement Hierarchy.

- 4.14 As a consequence, the finding on Oakley’s function as a Rural Service Centre is flawed, particularly as the relationship between additional housing growth and improvements in education provision should form a consideration when determining settlement status and ability to provide for housing growth.
- 4.15 The Council’s current Settlement Hierarchy (2018) rejects iterations where Oakley appears amongst the highest performing centres (e.g., **Iteration 4 – All Services excluding GPs**) and exceeds the threshold of 60 points for Key Service Centres. Omitting GPs is a robust approach, given that Oakley is extremely well-located for facilities at the west of Clapham.
- 4.16 Instead, the Council has based its Settlement Hierarchy on **Iteration 6 - All services (excluding schools and GPs)**. In other words, the Council gives no weight whatsoever to the important role played by education as a community facility and gives greater weight to minor elements such as freestanding ATMs. This is wholly contrary to the strategic priorities national policy requires authorities to address in plan-making.
- 4.17 At Paragraph 3.12 of the Settlement Hierarchy Topic Paper the Council falsely relies upon an assumption that existing schools would maintain their existing capacity and have little scope for expansion. This conclusion has been totally undermined by the recent and ongoing requirement for expansion at Lincroft Academy and Oakley Primary Academy within the 2020 to 2040 Plan period.
- 4.18 The shortcomings of this finding are exacerbated because strategic priorities relating to the requirements for social infrastructure (notably education) were deferred rather than dealt with in the Local Plan 2030. This is contrary to the requirements of national policy (NPPF2021 paragraph 20(c)).
- 4.19 The current development plan (including the Oakley Neighbourhood Plan) makes no provision for the expansion of Lincroft Academy that is required and is a function of the growth that the current spatial strategy supports across other Key Service Centres without Secondary School provision (including Clapham and Bromham).
- 4.20 Addressing these current unmet strategic priorities together with providing a positive approach towards the longer-term requirements for school infrastructure would be most effectively supported by reclassification of Oakley’s role in the settlement hierarchy to reflect its importance to the wider rural area (and strong links to the urban area).

- 4.21 We also set out wider concerns regarding the scoring applied in the Council's 2018 Settlement Hierarchy.
- 4.22 The provision of jobs in each settlement is given no weight in the Council's scoring of the Settlement Hierarchy and overlooks this as an important aspect of providing for sustainable communities. Oakley Primary Academy and Lincroft Academy also generate significant local employment opportunities both presently and in view of the expansion required. This includes around 80 Full-time staff (including teaching and support staff) and at least 50 Part-time roles (including caterers and cleaners), with the vast majority now operating from the campus following the lifting of Coronavirus restrictions. This is in addition to other commercial employment opportunities within the B2/B8 and Class E (including former Class B1) uses, including over 3,500sqm of high quality floorspace at Highfield Park and separate clusters at Whites Engineering and Station Road.
- 4.23 Other elements of community facilities and services not accounted for by the Council include 'early years' provision and other community meeting places (for example, cafés and restaurants).
- 4.24 Our concerns with the Council's approach to scoring in the current Settlement Hierarchy are summarised in Table 1 overleaf. It is immediately apparent that given the sustainability credentials of Oakley its classification as a Rural Service Centre is **not justified** and is hindering the ability to address the strategic priorities of the Plan Area.

Table 1: Review of Scoring Within the Bedford Local Plan 2030 Settlement Hierarchy

Criteria	Scoring Notes	2018 score	DLP Notes
Bus Services	Based on journey times to town centres during peak time and after peak time (Max 8 points)	8	Highest score achieved
Post Office	Mobile (4) or Permanent (8)	8	
Primary School	Considered more important than secondary	8	Assessment pre-dates expansion of Oakley Primary Academy
General Store	Key day-to-day provisions e.g., bread and milk	8	
GP / Health Centre	(Excluded from Iteration 6 and the Council's selected hierarchy option)		Facilities at Clapham within walking/cycling distance and accessible by public transport Not included in the Council's final hierarchy option
Community Centre / Parish Hall	highest score (8) given to permanent and non-shared facilities	8	
Other Shops	1-3 shops (4 points) 4-6 (6 points) 6+ shops (8 points)	4	Range of facilities considered to exceed minimum score applied in BBC assessment (e.g., noting cluster along Station Road)
Supermarket			
Garage / Filling Station			
Secondary / Middle School	Maximum 4 points - considered of lower importance	4	Council assessment pre-dates change of Lincroft Academy to a Secondary School and identified requirement for expansion
Library	Permanent (4) Mobile (2)	2	
Leisure	Open Space (4) Equipped Play (4) Bowling Green (4) and Allotments (4)	12	

Criteria	Scoring Notes	2018 score	DLP Notes
Public House	with food	4	
Public House	without food		
Church / Place or Worship		4	
Local Employment	Not Scored within Council Hierarchy	N/A	Oakley provides substantial local floorspace not accounted for by the Council. Includes in excess of 3,500sqm of high quality and high-tech employers in the Cluster at Highfield Park (with excellent strategic road links) plus further floorspace at Whites Engineering and at Station Road (site ref BE21)
Café or other Meeting Place	Not Scored within Council Hierarchy	N/A	No account taken of facilities at Station Road, for example
Early Years / Nursery Provision	Not Scored within Council Hierarchy	N/A	Facilities available at Oakley Pre-School: https://www.oakleypreschool.com/
Council Total (2018 Scoring Methodology)		70	
Council Total Applied (Selected Hierarchy - Iteration 6) Excluding Schools and GPs		58	

Remedy

- 4.25 An appropriate remedy for this would be to complete a review of the preferred options within the Local Plan 2040, treat Oakley specifically as a Key Service Centre and recognise that the area has missed out on potential growth to meet key infrastructure requirements as part of the approach to preparation of the Local Plan 2030.

Paragraphs 3.10, 3.16 and 3.17 of the Bedford Borough Local Plan 2040 - Objection

- 4.26 Bedfordia generally support the wider approach the Council has taken to the Spatial Strategy across the authority area; recognising that housing and job growth can be accommodated through a hierarchy of urban and rural communities.
- 4.27 Paragraph 3.10 of the Local Plan 2040, highlights that, as part of last year's Issues and Options consultation, the Council outlined six distribution options which could form part of the strategy for growth. These were:
- Brown – Urban based growth
 - Yellow – A421 based growth
 - Pink – Rail based growth
 - Orange – East-West rail northern station growth
 - Grey – Dispersed growth
 - Red – new settlement-based growth
- 4.28 The responses to the issues and options consultation indicated that there was broad consensus favouring development focused on the existing urban areas and the A421 corridor, and possible new railway stations which might be delivered on the new East-West Rail Line. This does not, however, provide justification to preclude the potential benefits of dispersed growth altogether.

Reasoning

- 4.29 In conjunction with paragraphs 3.16 and 3.17 of the Local Plan 2040, an alternative 'hybrid' approach is required to provide for an appropriate strategy. This approach is consistent with the criterion informing the spatial strategy under Policy 3S of the LP2030, supporting proposals to deliver sustainable development and growth that enhances the vitality of the Borough's urban and rural communities. This specifically expects contributions towards the objectives and policies of the Plan through (*inter alia*):
- (iii) Strategic residential development in key service centres in association with expanded education provision where necessary.
 - (iv) Limited development in rural service centres in line with existing and potential capacity of infrastructure and services.
 - (v) Delivering the majority of rural growth through neighbourhood plans.
- 4.30 On the basis of the Council's Preferred Options the Plan's strategic policies would not continue support for these components of a sustainable strategy beyond 2030. Moreover,

there is an existing conflict arising from the approach to Policy 3S, where Neighbourhood Plans being prepared are likely to have addressed some but not all of an area's priorities and only in the context of the significantly lower OAN adopted in the LP2030. The Council's approach in the current Plan led to issues being deferred, rather than dealt with, meaning that the Preferred Options only seek to compound this problem.

- 4.31 The Council's Preferred Options must therefore be reconsidered and adapted to coincide with ongoing support for those parts of the spatial strategy endorsed within Local Plan 2030 Policy 3S that the Council's own evidence recognises as essential to securing contributions towards sustainable development.
- 4.32 The annual requirement in the adopted Local Plan 2030 is 970 dwellings per year. The minimum annual local housing need figure for the Local Plan 2040 represents a substantial increase to the adopted Plan and will bring with it considerable challenges.
- 4.33 Policy 3S was also in reality a 'hybrid' approach. The Council recognised it was unable to make provision for even its own lower figure for objectively assessed needs without diversification of the spatial strategy. The reasons for this primarily relate to issues that are not new to this Plan-making process – namely the delivery of extant commitments on Town Centre sites. The incorporation of new large-scale strategic options, which the Council was unable to soundly introduce to the LP2030, adds to the number of locations where longer-term development timescales need to be considered but does not change the justification for a flexible approach already recognised as sustainable.
- 4.34 Bedfordia query the ability of Bedford to deliver some 1,275 new dwellings per annum, given the constraints Bedford faces and the levels of growth that previously have been achieved, including to the south of the town, without sustaining a flexible approach.
- 4.35 To achieve a balanced development pattern, further growth should be directed to the settlement hierarchy north of Bedford and in-particular to Oakley arising from its reclassification as a Key Service Centre, which was an issue not addressed in the Local Plan 2030.
- 4.36 Oakley provides a good level of facilities and can perform an important role in facilitating strategic residential development, considering the existing and potential capacity of infrastructure and services and the potential to deliver wider benefits to the local community.

Remedy

- 4.37 As part of this approach the allocation of housing to any KSCs or RSCs needs to have regard to the overall levels of increased housing need, and where appropriate the quantum adjusted to reflect both settlement and site capacity.
- 4.38 In the case of Oakley, it is appropriate to adopt a more comprehensive approach to strategic residential development that is well-related to the village and providing benefits associated with improvement to the Lincroft Academy campus and playing fields, and associated highway infrastructure, that cannot be delivered through the allocation of a combination of smaller site options. This approach to more detailed site assessment and site selection as part of a 'hybrid' strategy option would be wholly consistent with rolling-forward the approach to the spatial strategy in Policy 3S of the LP2030 which the Council agrees to be sustainable.

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

- 4.39 The opportunity for transformative change resulting from the delivery of East-West Rail within Bedford Borough is not disputed. However, the Council's own evidence demonstrates that the level of rail-based growth at Kempston Hardwick/Stewartby and Wixams relied upon as part of its Preferred Options is unsound. National Planning Practice Guidance ID: 68-020-20190722 states that a pragmatic approach should be taken when considering the intended phasing of sites, where the authority may need to provide a greater degree of certainty than those in years 11-15 or beyond. The PPG expands on this by stating that where longer-term sites are relied upon evidence must be available to demonstrate that they will come forward within the timescales envisaged and at a rate sufficient to meet needs over the plan period (ID: 68-019-20190722).
- 4.40 While these sections of the PPG post-date the NPPF2012 it is the case that the Council has historically failed entirely in setting out realistic timeframes for the development of complex sites. These shortcomings have particularly affected Town Centre sites in the past, which the Council will now unsuccessfully rely upon to sustain completions against the housing requirement in the Local Plan 2030. We argued at the previous Local Plan Examination that such sites should be identified as developable no earlier than the 11-15 year period.
- 4.41 The issues with existing sites will be compounded in the Council's trajectory for the Local Plan 2040 (meaning that even its proposed 'stepped approach' against a requirement of

970dpa to 2030 will not be effective). These representations further demonstrate the lack of evidence to consider rail-based growth in the A421 corridor as developable any earlier than years 11-15 of the plan period (if not beyond) thus rendering the Council's Preferred Options entirely unsound.

Reasoning

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

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

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

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

4.44 There is no evidence to indicate these totals as developable in the period to 2040. In the absence of site-specific testing the Council can have no grounds to suggest how constraints might be overcome, when infrastructure will be provided and whether the extremely high levels of development required to meet these totals over a very short period between sometime after 2030 and 2040 can be achieved.

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

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

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

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

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

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

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

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

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

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

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

4.54 The longstanding issues with delivery of the Wixams New Station are illustrative of the

impacts upon rates of development likely to be experienced at Stewartby/Kempston Hardwick. Evidence presented at LP2030 Examination demonstrated that the build-out rate of Wixams within Bedford Borough has been 96 dwellings per annum over the 10-year period to 2018. Development has since commenced in Central Bedfordshire, increasing the overall build-rate but corresponding with a reduction of activity in Bedford Borough.

- 4.55 Delivery of the Station has been delayed by over 11 years with the project still not expected to commence construction until 2023 at the earliest. Commissioning of a detailed design scheme for the proposed station was able to progress earlier in 2021 contingent on the basis of consultation on the proposed northern alignment of East-West Rail.
- 4.56 While any final decision is awaited on the outcome of the Bedford-Cambridge phase of East-West Rail there remains a risk that the time-limited period for funding available from the lead developers of the Wixams scheme will expire and result in the project not being delivered (or requiring additional monies to address the shortfall in project costs).
- 4.57 In the context of the above delays and uncertainty and in the absence of a clear timeframe for delivery of the station the Council's Preferred Options present no site-specific evidence of how the additional capacity at Wixams could be achieved over the Plan period and at an appropriate build-out rate (in addition to the delivery of extant commitments).
- 4.58 The characteristics of any potential increase in allocations at Wixams also represents an issue of cross-boundary strategic importance, given that the scheme is being delivered across local planning authority boundaries and the requirement for partial review of the Central Bedfordshire Local Plan 2015 to 2035. This could lead to any potential for additional development being required to address the unmet needs of neighbouring authorities (or affecting the administrative boundaries within which the most appropriate land should be identified).

Remedy

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

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

Paragraphs 3.26 – 3.28 (Small Sites) –Object

- 4.60 The Council's proposed approach to enabling the development of small sites as a source of flexibility in supply and to provide diversity within the construction sector is misconceived inconsistent with national policy, ineffective and not justified. The Council is simply seeking to ignore the requirements at paragraph 69 of the NPPF2021 and undermine the Government's objectives to support *inter alia* SME builders, prosperous rural communities, and measures to address affordability.

Reasoning

- 4.61 The Council seeks to rely on evidence of past and expected future trends in windfall development in place of the requirement in national policy to identify, through the Development Plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare.
- 4.62 The reasoning for the approach in national policy is simple: the Development Plan is the most appropriate vehicle to set out positively prepared policies to support the delivery of small sites and enable small and medium developers (who often face the greatest barriers to entry in the sector) to secure implementable planning permissions more easily.
- 4.63 The Council's own evidence in the Small Sites Topic Paper demonstrates a year-on-year fall in trends in the completion of small windfall sites against the Local Plan 2030 requirement of 970dpa. This is illustrative of issues affecting the sector. The Council must also be mindful of the fact that more recent policies in the development plan (particularly those within Neighbourhood Plans) provide a further barrier to bringing forward appropriate proposals on unidentified sites.
- 4.64 The evidence from past trends fails to support the Council's contention that windfall supply will provide for 10% of the higher requirement based on minimum annual local housing need for the period 2020 to 2040. The Council relies on expected future trends but the justification for its proposed approach fails for the following reasons:

- The Council's reference to extant commitments takes no account of any potential

- lapse rate or double-counting with assumptions of future supply
- Expected trends take no account of changes to Permitted Development Rights (including restrictions upon office-to-residential conversions and a reduction in the number of potentially suitable sites)
- Extant small-site commitments take no account of those that are effectively ‘one-off’ schemes that would not be accessible to the SME sector (e.g., backland plots or subdivision)
- The likely supply from Neighbourhood Plans, which is a tiny proportion of the 2,260 dwellings required from this source and illustrative of these Plans often focusing development on a limited number of challenging sites, is dwarfed by the resulting restrictions on additional growth.

Remedy

- 4.65 There are some positive aspects to the Council’s evidence base to support growth on small sites, such as the 136 units’ capacity identified in urban areas. In reality we consider that this total should be increased and that in order to achieve the Council’s Preferred Options to include allocation of a further 1,500 units within the urban area it will be necessary to maximise the potential contribution from small sites. The Council’s total of 1,500 is over-and-above extant development plan allocations within the Town Centre that are and will remain significantly constrained. Failure to diversify urban supply without support through the development plan will result in this component of the spatial strategy being unsound.
- 4.66 The Local Plan 2040 should also offer substantially greater support for the delivery of small sites in rural areas. This advances the case for the strategic policies of the Local Plan 2040:
- Setting out indicative requirements for all settlements within the Borough’s hierarchy (outside of Key Service Centres and Rural Service Centres) to encourage provision for appropriate levels of smaller-scale growth
 - Proactively support the delivery of rural exception sites
 - Where Policy 4S of the Local Plan 2030 is superseded in terms of the scale and distribution of growth required at Key Service Centres and Rural Service Centres ensure that any increased need for development to be provided through reviews of Neighbourhood Plan also has regard to NPPF2021 paragraph 69
- 4.67 The opportunity for the Local Plan 2040 and any Neighbourhood Plans to be prepared taking a more flexible approach towards the requirements of national policy is supported in principle. For example, where any allocations proposed would offer the opportunity for early delivery and the potential to introduce multiple developers to relevant sites it would be appropriate to treat the 1 hectare threshold pragmatically, recognising that the revised strategy will itself provide substantial opportunities for diversification.

Paragraphs 3.12 and Table 1 (Evidence Base) AECOM Transport Model: Highways Strategy – Object

4.68 The Council's Preferred Options Consultation Document (paragraph 3.12) indicates that four main spatial scenarios have been subject to highways testing as part of the assessment of Strategy Options. The Council relies upon the summary of findings from the AECOM Transport Model to support its conclusions on the individual options set out in the Development Strategy Topic Paper.

4.69 For **Option 3c** the Topic Paper indicates highways constraints as a reason to reject this strategy option based on its inclusion of 'village-related' growth and thus representing a more dispersed approach. The conclusions state:

"Given the highway constraints on the A6 north of Bedford (including both new settlements KSCs and RSCs), the need to allow villages already planning development to assimilate that growth, the more dispersed nature of the distribution of growth and the loss of focus on EWR, these options do not perform as strongly."

4.70 The Council's claims regarding the level of impact generated by any level of development at Key Service Centres and Rural Service Centres are **not justified**. The Council primarily relies on evidence of other components comprising part of these strategy options (particularly 'New Settlements' on the A6) as generating a significant element the highways impact on the highways network.

4.71 The assumed impact arising from village-related growth specifically results from the first stage of testing undertaken in the AECOM Transport Model. Paragraph 1.2.2 of the Summary Report explains that this was only considered as part of testing of four general development scenarios, relating to the 'grey' (dispersed) option providing no focus upon strategic growth locations within the corridor:

"this scenario includes all sites identified as part of the Local Plan 2040 call for sites consultation with the size of the proposed developments scaled uniformly to ensure that the overall growth in the borough is considered to be in the likely range of the new Local Plan housing and employment targets."

4.72 This approach to testing bears very little relationship with the Council's subsequent testing of strategy options where the opportunity to focus some growth on the urban area and A421 corridor is not disputed. Levels of growth required to be tested under the 'dispersed' scenario are materially higher than the relatively limited proportion of 'village-related' growth in Option 3c not otherwise associated with 'east' and 'south' corridor parishes. Moreover, the AECOM

testing of the ‘dispersed’ scenario has the same flaws as the Council’s testing of ‘village-related’ growth in the strategy options by opting for a ‘uniform’ or ‘one-size fits all’ approach to levels of development at individual settlements. This overlooks where site-specific or settlement-specific justification for site selection could reduce impact on the highway network.

- 4.73 Upon beginning the process for identifying strategy options the Council has acknowledged the need for subsequent Transport Modelling. This is set out at paragraph 1.4.1 of the AECOM Summary Paper and includes additional testing of ‘New Settlement’ options on the A6.
- 4.74 Our client has instructed Transport Consultants SDD to undertake a ‘Review of “Bedford Borough Transport Model”, including the specific assessment of impact of New Settlements on the A6. A copy is enclosed at **Appendix 5**.
- 4.75 The findings of the Review confirm:
- Beyond levels of committed growth to 2030 in the ‘reference case’ the AECOM scenarios are based upon different levels of growth at Twinwoods and Colworth only, and whether each / both sites are brought forward.
 - No sensitivity testing has been undertaken whereby the two new settlements at Colworth and Twinwoods do not come forward, and instead housing growth development at other existing villages across Bedford Borough.
 - There is no justification provided within the report as to why the focus of assessment has been focused on the development at Colworth / Twinwoods only, as opposed to assessing potential levels of ‘village-related’ growth in accordance with **Option 3c** north of Bedford from a highways capacity perspective
 - No assessment is provided of the dumbbell roundabouts off the A6 in the vicinity of Oakley, nor the junctions with Highfield Road further north along the A6
 - There is no specific testing of impacts and changes to the network resulting from the deferral of site allocations to Neighbourhood Plans – specifically the need for a new roundabout on the A6 at Sharnbrook required as part of the proposed Hill Farm development.
- 4.76 It follows from the above that the Council’s conclusions for strategy options in the Development Strategy Topic Paper and reasons for the selection of Preferred Options at Paragraph 3.12 of the Consultation Document are **not justified** and **not consistent with national policy**.
- 4.77 The Council has not only failed to justify that the impact of Option 3c on the highway network would be severe but failed to begin preparation of Transport Modelling that would in any way

allow it to test a ‘hybrid’ approach to development in providing for an appropriate strategy. The requirement for further testing is significant in terms of ensuring further site-specific and settlement-specific testing of options maximises the potential to achieve benefits for the highway network in accordance with paragraph 110 of the NPPF2021, for example:

- Assessing the opportunities to relieve congestion at Station Road, Oakley associated with Lincroft Academy through provision of a new dedicated access together with supporting sustainably located residential development within easy walking distance of Primary and Secondary education in the village
- Promoting growth adjacent and well-related to the Sharnbrook Settlement Policy Area, facilitating opportunities for the delivery of new and accessible services and facilities (including a Primary School) within walking distance from existing residents of the village in order to sustain and enhance its role.

4.78 This section of our representations (and supporting information at **Appendix 5**) confirms the requirement to undertake further detailed testing of a ‘hybrid’ strategy option including an accurate assessment of potential impacts on the highway network.

5.0 PROPOSED APPROPRIATE STRATEGY ALTERNATIVE – A ‘HYBRID’ APPROACH

- 5.1 This section of our representations should be read alongside the standalone Review of the Council’s Draft Sustainability Appraisal (copy at **Appendix 4**). The conclusions of the review support the Modifications in this part of the representations. This section also reinforces our specific comments on the Council’s Preferred Strategy Options published in the main consultation document.
- 5.2 These representations propose an alternative ‘hybrid’ spatial strategy. This is consistent with the Council’s evidence base for the emerging Local Plan 2040; would overcome the soundness issues identified with the Council’s Preferred Options; and would comprise an appropriate strategy for the purposes of Paragraph 35(b) of the NPPF2021.
- 5.3 The ‘hybrid’ strategy recognises that there is no arbitrary distinction between ‘village-related’ growth and support for development in the ‘east’ and ‘south’ corridor parishes in terms of their capacity to contribute towards sustainable development. The benefits of ‘village-related’ development do not suddenly materialise only where Key Service Centre and Rural Service Centres are located in the A421 corridor and do not evaporate altogether outside of it.
- 5.4 The Council expressly recognised this in the evidence base for the current Development Plan. In the current Preferred Options, it has taken an inconsistent approach to assessing the effects of the ‘village-related’ development component by reaching different conclusions for exactly the same settlements (in the ‘east’ and ‘south’ corridors) when they are assessed as part of the Preferred Options as opposed to other strategy options (e.g., **Option 3c**).
- 5.5 The ‘hybrid’ option assigns the ‘village-related’ growth component only to those settlements outside of the ‘east’ and ‘south’ corridors. Levels of development, for the purposes of an indicative distribution, have been retained at 500 units in Key Service Centres and 35 units in Rural Service Centres albeit these are arbitrary figures and should be determined on a case-by-case basis. Wixams has been excluded from the total for Key Service Centres (reflecting its inclusion in the locations for rail-based growth). The only exception, taking account of this, is an increase of 215 units in the distribution to Oakley based on our recommendation for it to be reclassified as a Key Service Centre and growth east of Station Road being specifically supported.

- 5.6 For the A421-based components of the strategy the total distribution to the ‘east’ corridor parishes are retained at the figure of 750 dwellings in the Council’s Preferred **Option 2d**.
- 5.7 In terms of the ‘hybrid’ strategy this could accommodate greater flexibility in terms of large-scale strategic growth included in the strategy options. We have included the Council’s minimum figures for inclusion of rail-based growth at Kempston Hardwick/Stewartby and New Settlements in either the A6 or A421 corridor, which is more likely to reflect realistic timescales for development.
- 5.8 Including both components would exceed the minimum 12,500 units required from additional allocations, with an appropriate buffer for flexibility and contingency (particularly in terms of the prospects for meeting increased needs before 2030). There is no reason higher quanta could not be included as part of an extended Plan period. Equally, this could allow some settlements to be excluded from further village-related growth albeit we would not recommend this where Neighbourhood Plans being prepared have failed to address important strategic priorities (as at Oakley and Sharnbrook, for example).
- 5.9 The ‘hybrid’ strategy based on these components are summarised in Table 2 below:

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

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

5.10 We have utilised the 'hybrid' strategy to consider an assessment of effects in-line with the Council's Sustainability Appraisal framework. When the 'hybrid' strategy is compared with the standalone findings for growth components and the Council's Options **2d** and **3c**, as well as the 'do nothing' scenario, it is apparent that the potential benefits towards sustainable development are enhanced. This is as a result of recognising that the potential negative effects the Council assigns to village-related growth are incorrect and, in any event, inaccurate because it ignores the location of some Key Service Centres and Rural Service Centres within the A421 corridor. It also recognises that some the benefits of what is in reality 'village-related' growth in the 'east' and 'south' transport corridors will be shared across settlements elsewhere in the hierarchy. The results are summarised in Table 3 below:

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

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

6.0 DELIVERY ASSESSMENT AND PROPOSED STEPPED TRAJECTORY

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

- 6.1 This section of the representations should be read alongside the separate Delivery Assessment included at **Appendix 3**. This addresses the ability of the Council approach to maintain a rolling five year supply of deliverable sites (including as part of its proposed use of a ‘stepped trajectory and upon proposed adoption of the Local Plan 2040). The Delivery Assessment also illustrates that the Council is unable to demonstrate a five year supply of deliverable sites based on its own published position (at a base date of 1 April 2019) or when this is rolled forward to 1 April 2021.
- 6.2 In summary, the Council’s proposed approach to managing the delivery of housing over the Plan period is unsound. The Council indicates a proposed 20-year Plan period (2020 to 2040) for the Local Plan Review. The Local Plan Review must meet minimum annual local housing need calculated in accordance with the Standard Method. Planning Practice Guidance ID: 68-031-20190722 answers the question ‘how can past shortfalls in housing completions against planned requirements be addressed’? and states:
- “Where the Standard Method for assessing local housing need is used as the starting point in forming the planned requirement for housing, Step 2 of the Standard Method factors in past under-delivery as part of the affordability ratio, so there is no requirement to specifically address under-delivery separately when establishing the minimum annual local housing need figure. Under-delivery may need to be considered where the plan being prepared is part way through its proposed plan period, and delivery falls below the housing requirement level set out in the emerging relevant strategic policies for housing.”*
- 6.3 Based on the emerging proposals the performance of delivery in the period 2020 to 2023 will be relevant to assessing the soundness of the Local Plan 2040. Performance for this period will therefore be substantially informed by the Council’s current evidence of deliverable supply against the Local Plan 2030 housing trajectory (and extant consents).
- 6.4 The Council’s Preferred Options consultation proposals also indicate that it is likely to rely on a ‘stepped trajectory’ for the Plan period to 2030 (retaining an annual requirement of 970 dwellings per annum). The Preferred Options principally rely on large-scale strategic sites with limited prospects for delivery within five years from adoption (2023 to 2028). The Council’s supply for this period will therefore also substantially be informed by the Local Plan 2030 trajectory (and characteristics of sites identified in Neighbourhood Plans).

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

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

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

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

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

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

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

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

7.0 SITE OPPORTUNITY AND RESPONSE TO SITE ASSESSMENT PRO-FORMA (CALL FOR SITES ID: 839/832)

Introduction to Site and Proposals

- 7.1 The site subject to this representation is Land off Station Road, Oakley, which extends to approximately 15.22ha. The site is 'triangular' in shape, and is bounded to the south by Lovell Road, on its eastern side by the Midland Main railway line, which is on an embankment along this length and hence is a strong defining feature, and properties on Lovell Road (including the land at No. 24 Lovell Road which has the benefit of planning permission for residential development), and to the west by Station Road and the built development that runs with that.
- 7.2 The site is wholly contained by development or built infrastructure and is very well related to the structure, form, and character of the village as it appears on the ground, making it a highly sustainable location for new development.
- 7.3 In the case of our client's land, the site was considered favourably in the Council's 2017 Consultation Paper as part of preferred options for site allocation. The northern portion of the site (c.2ha) is allocated for development under Policy HG1 of the Oakley Neighbourhood Plan, which was made and adopted on the 23rd of March 2020.
- 7.4 The ONP allocates two sites in accordance with the requirements of Policy 4S of the LP2030 to provide for a minimum of 25-50 dwellings up to 2030.
- 7.5 Promotion of our client's wider interests East of Station Road does not impact upon the intention to bring forward those parts of the land currently identified within the Indicative New Settlement Area and in accordance with the policies and objectives of the ONP.
- 7.6 In order to meet to ONP level of development up to 2030 and the additional level of development that would be required to satisfy the emerging Local Plan until 2040, the wider site could deliver around an additional 200 residential dwellings. Furthermore, in accordance with relevant development plan policies, the development proposal will include the provision of additional affordable housing and a mix of housing types.

Services and Facilities

- 7.7 Oakley is considered to be a sustainable location for new development on the basis of the services it currently offers and its proximity to those found in nearby Clapham (approximately 2km) and Bedford some 7km to the east. Oakley provides a good range of local employment

opportunities, including land designated for these uses at Highfield Road in close proximity to the site.

- 7.8 Furthermore, the proposed development would offer the opportunity to complement and enhance these existing facilities by enabling the existing, well-established, and popular Lincroft Academy. This is in order to both improve to better meet the needs of its pupils and staff and increase capacity to enable the school to meet the increased demands arising from planned growth within its catchment area; notably the level of growth currently planned at Bromham, Clapham and Oakley.
- 7.9 The proposal would also provide the opportunity for the school to offer its sports facilities for community use whereas now the facilities are considered unsuitable for such use.

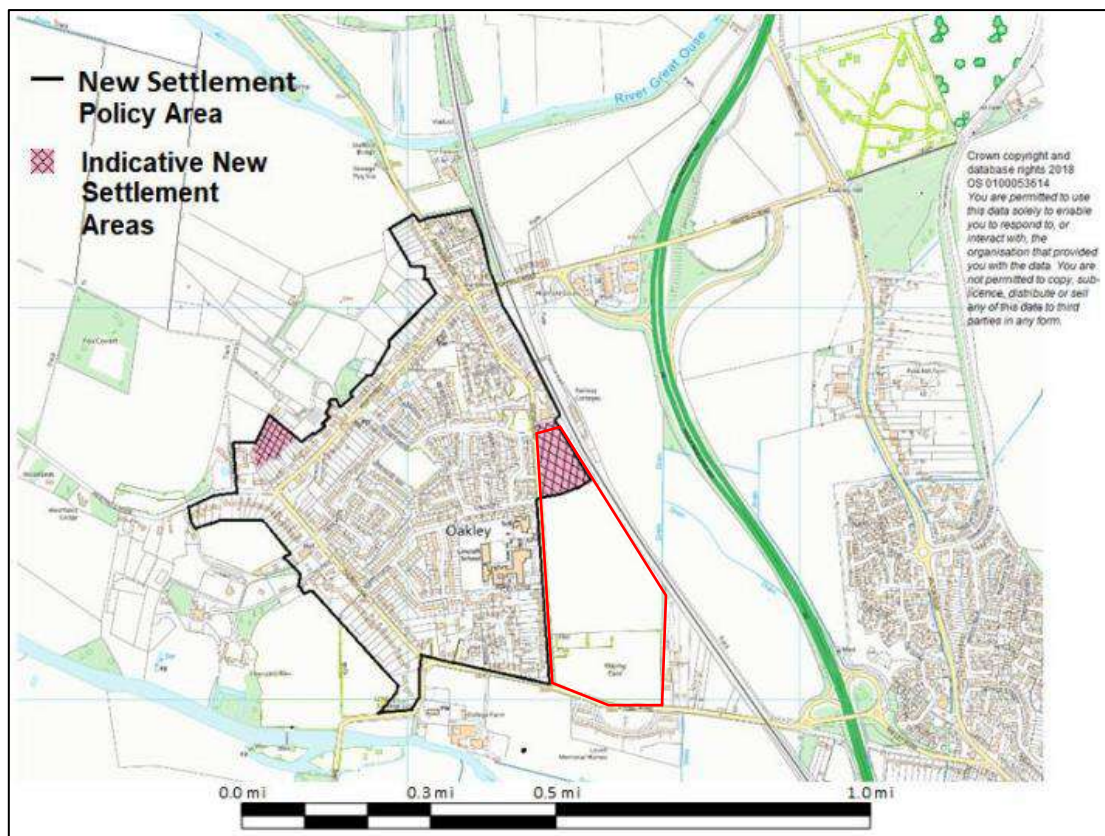


Figure 1: Oakley Settlement Boundary, with Station Road allocation outlined in red.

Proposed Development Option

- 7.10 In addition to the above, the Borough Local Plan Review 2040 rolls the Plan forward by 10 years. However, this is insufficient given the Ox-Cam Arc looks towards 2050 but notwithstanding this, it is clear that more development needs to be found across the Plan Area. Currently, the draft Plan focuses mainly on new settlements and rail-based growth and pays little attention to the rest of the settlement hierarchy.
- 7.11 The land provides an opportunity to provide for a carefully considered mixed residential development area, including new and better located sports facilities for Lincroft Academy.
- 7.12 The allocation of our client's Land East of Station Road in full would also enable provision a new traffic managed through-route which would be evidenced through technical reports. This proposed through-route would not only provide for the creation of a new dedicated school entrance drive and development access road for the new housing area but would also ensure that traffic would be externalised and existing issues of school traffic, parking and associated congestion on Station Road would be removed.
- 7.13 These representations should be read alongside and with those prepared on behalf of the Cambridge Meridian Academies Trust (CMAT) which seek recognition within the Plan-making process of the significant increase in the pupil roll be accommodated through the expansion of Lincroft Academy.
- 7.14 CMAT support in principle indicative land-use proposals for a 'one-site' solution incorporating land East of Station Road within the Lincroft Academy Campus through the relocation of existing sports pitches, facilitated by joint promotion of the land.
- 7.15 Submission of these representations reflects that negotiations between the parties are advanced, ongoing and expect an agreement that will satisfy the Education and Skills Funding Agency regarding the enhancement of facilities to be achieved, retain the support of other stakeholders (including Sport England), and recognise the wider benefits of developing the larger site.
- 7.16 Details of an indicative layout making provision for these improvements and wider benefits is included at **Appendix 2**.
- 7.17 The proposal would both address existing and well documented issues and deliver the

following benefits:

- 1) The creation of a new, self-contained Lincroft Academy campus (comprising both primary and secondary schools) with the existing school sports facilities, which are separated from the school at present, being moved onto land directly opposite the school, thus increasing convenience and safety, and pre-school provision. These will be re-modelled and new, modern, all-purpose facilities will be created with an indicative scheme comprising:
 - Playing fields;
 - Multi-purpose artificial sports pitches;
 - Athletics track;
 - Sports pavilion;
 - Extensive new parking and circulation area; and
 - Changing and sports teaching/admin facility.
- 2) The stopping up of Station Road north and south of Lincroft Academy and provision of a new road around the perimeter of the site provides positive benefits. A new, traffic managed 'through-route' would be created on the eastern periphery of the site, which would also provide for the creation of a new dedicated school entrance drive and would also serve as a development access road and serve the new housing area. In doing so, traffic would be externalised and existing issues of school traffic, parking and associated congestion on Station Road would be removed.
- 3) The site could provide around an additional 200 residential dwellings including the provision of affordable housing. New tree planting would also be provided to the site boundaries, which would provide a landscaped edge to the site, as well as within the site to break up the built development.
- 4) The site, as stated, is well contained on all sides and there would be no encroachment into the open countryside. Development would be defined by logical and defensible boundaries – notably the railway line to the eastern side and existing residential development on the remaining boundaries.

Summary of Draft Masterplan

7.18 The following plans are appended:

Drawing Ref.	Description
PLOC 04	Appendix 1 - Site Location Plan
SK09B	Appendix 2 - Masterplan Concept (BE1 Architects)

Response to Borough Council's Site Assessment Pro-Forma and Neighbourhood Plan Assessment

7.19 The site was submitted to the Summer 2020 Call for Sites event.

Site Assessment Pro-forma (ID:839 / ID: 832) – Objection

7.20 The resulting assessments do not provide a robust justification for the approach taken to site selection and supporting growth. The assessments do not provide a criteria-based assessment of relevant factors (including suitability, availability, and achievability). The view of Bedford Borough Council as part of its 'Initial Site Assessments' (2017) was that the land East of Station Road is suitable, available and achievable for development.

7.21 The site assessment pro-forma for the site does not identify future requirements for infrastructure provision or how these might be addressed; and does not assess any relevant constraints in terms of how they might be overcome. Identification of 'wider infrastructure issues' is frequently cited as informing the assessment findings, including in relation to highways capacity, without adequate reference to the associated evidence base and the potential benefits arising from development.

7.22 The site assessment also highlights that there are no protective designations restricting development upon the site.

Reasoning

Impact on designated or non-designated heritage assets or their setting

- 7.23 The site assessment found that the site has potential to cause harm to heritage assets. As part of external assessments relating to bringing forward application proposals on the land allocated within the Oakley Neighbourhood Plan, we can confirm these identify that development of the land may impact on the wider rural setting of nearby designated heritage assets, resulting in slight harm to one aspect of their setting. Noting the significance of the affected assets, including the contribution made by their wider setting the level of impact is likely to be limited or negligible. With the appropriate mitigation measures (stepping back the building from the road frontage, careful landscaping, planting etc.) the harm would certainly represent less than substantial harm in terms of Paragraph 202 of the NPPF.
- 7.24 Experience with the Council's Archaeology Officer also indicates that these matters are capable of being addressed by way of a geophysical survey and/or archaeological trial trenching evaluation ahead of submission of a planning application.

Ecology and Protected Species

- 7.25 In relation to ecology matters, external assessments undertaken as part of bringing forward application proposals on the land allocated within the Oakley Neighbourhood Plan demonstrate that there would be no impact on protected species or habitats that could not be appropriately mitigated.
- 7.26 As part of future development of the wider site it would be appropriate to seek preparation of a further Ecological Impact Assessment comprising a Phase 1 Habitat Survey and assessment of potential site features supporting the presence of protected species.
- 7.27 This would be an appropriate basis to assess the impact of the development proposal and set out mitigation measures required to ensure there is no net harm to ecological features and where possible identify any opportunities available for integrating ecological features within the development. It is anticipated that a number of ecological enhancements could be provided as part of proposals, such as habitat piles, hedgehog tunnels, bat boxes, bird boxes and native planting and that delivery of these enhancements would lead to an overall Neutral to Minor Beneficial impact

Best and Most Versatile Agricultural Land

- 7.28 While the Council's site assessment pro-forma records that all or a majority of the site is best and most versatile agricultural land as defined in the NPPF this ignores that a significant proportion of the site is in use as existing playing fields with around 2ha already subject to allocation within the adopted development plan. The land does not form part of a wider area used for farming and relates most closely to the existing built-up area. On this basis the impact on the supply of best of most versatile agricultural land should not be seen as significant in the context of overall development needs.

Highways

- 7.29 The key factor identified as an area of concern within the Council's site assessment proforma relates to perceived highways issues. The site assessment states that the amount of extra traffic resulting from the proposed development would likely cause increased congestion, particularly on Station Road. The issues identified relate to existing congestion on Station Road, within the village, which neither the Local Plan 2030 nor Oakley Neighbourhood Plan seeks to address.
- 7.30 The Council's assessment findings ignore altogether the expected increase in pressure that will result from the immediate expansion required in the pupil roll at Lincroft Academy. Proposals for our client's land, which are not reflected in the pro-forma, include the stopping up of Station Road north and south of Lincroft Academy and provision of a new road around the perimeter of the site. In doing so, traffic would be externalised and existing issues of school traffic, parking and associated congestion on Station Road would be removed.
- 7.31 Furthermore, the scheme proposes to include an expansion of the footpath network to create a safer environment for pedestrians as well as providing improved cycle connections for access to the schools.

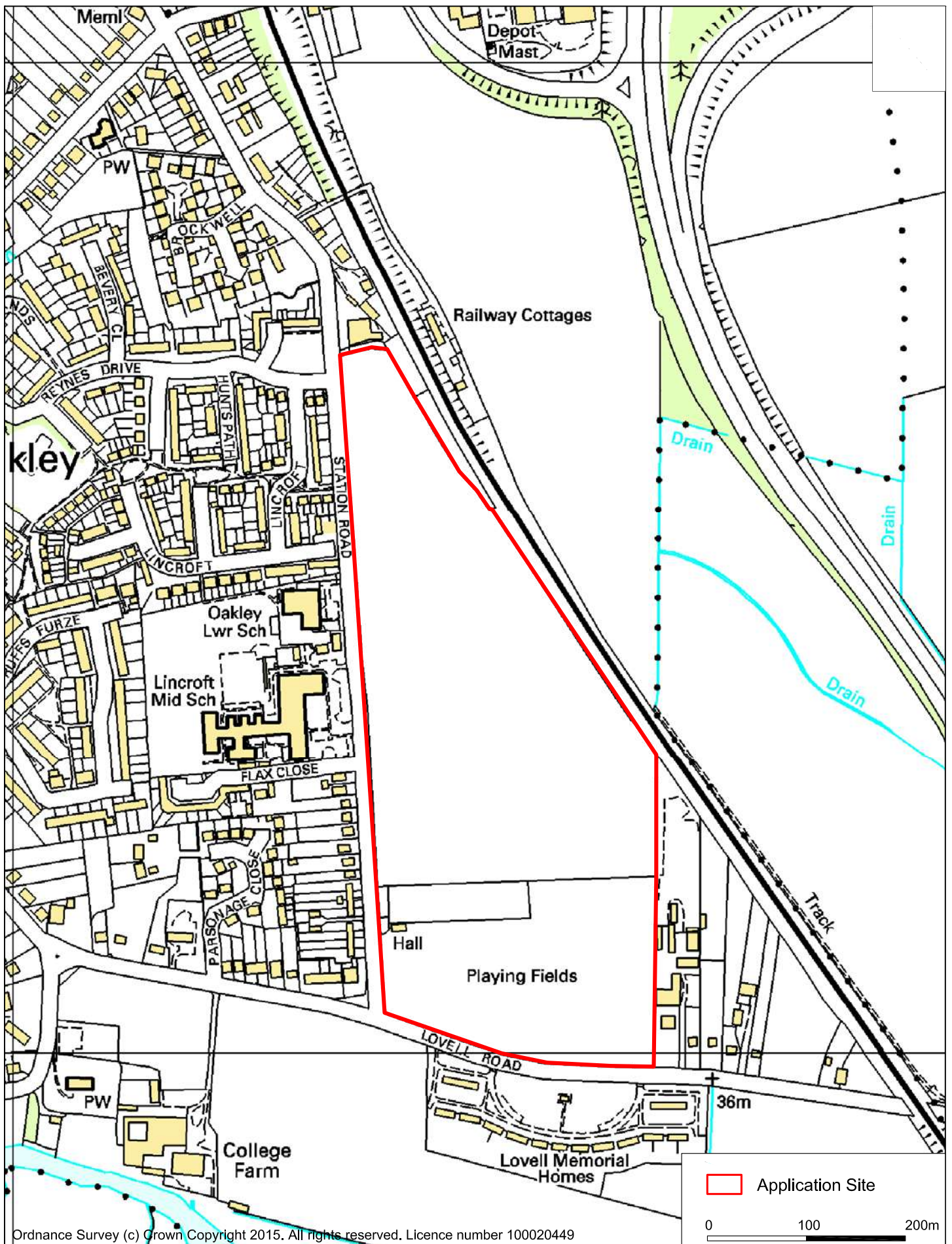
Suggested Alternative Site Assessment Finding


- 7.32 Given the findings of the assessment, Land East of Station Road appears to be suitable for development, ensuring that the appropriate assessments are conducted in terms of highways and archaeology.



BE1564-16P – Land at Station Road, Oakley
Bedfordia Developments Ltd
Bedford Local Plan 2040 Representation
September 2021

Appendix 1 Location Plan (Land East of Station Road (ID: 832 / ID: 839))



CLIENT Bedfordia	DATE 27.11.2015	OS REF 501451, 253370	DRAWN BY PMG	DLP PLANNING LIMITED 4 Abbey Court, Fraser Road, Priory Business Park Bedford, MK44 3WH t 01234 832 740 f 01234 831 266 e bedford@dlpconsultants.co.uk	 dynamic development solutions™
	SCALE 1:5000 @ A4	DRWG NO PLOC 04	CHECKED GF		
	JOB NO N-BE1565	REV			
PROJECT Land off Station Road Oakleigh	DRAWING TITLE Location Plan		Offices also at: Bristol, Cardiff, Leeds, London, Milton Keynes, Nottingham, Rugby and Sheffield		



BE1564-16P – Land at Station Road, Oakley
Bedfordia Developments Ltd
Bedford Local Plan 2040 Representation
September 2021

Appendix 2 Land East of Station Road Indicative Masterplan (Site ID: 832 / 839)



Ordnance Survey © Crown Copyright 2013. All rights reserved. Licence number 100022432

CLIENT Bedfordia	Date	08.12. 2015	OS Ref.	501478,253364	Drawn By	SK
	Scale	1:2500 @ A3	Drawing no.	SK09B	Checked By	MEH
	Job no.	BE1564-2	Rev.	B		
PROJECT Land at Station Road, Oakley	DRAWING TITLE Masterplan Concept		be1 Architects 5 Abbey Court, Fraser Road, Priory Business Park, Bedford MK44 3WH Tel: 01234 261 266 Fax: 01234 831 437 Email: enquiries@be-1.co.uk Web: www.be1architects.co.uk <small>Offices also at: Bristol, Cardiff, East Midlands, Leeds, London, Milton Keynes and Sheffield</small>			





BE1564-16P – Land at Station Road, Oakley
Bedfordia Developments Ltd
Bedford Local Plan 2040 Representation
September 2021

Appendix 3 Bedford Local Plan 2030 Delivery Assessment



Strategic Planning Research Unit
A specialist team within DLP Planning Ltd

For and on behalf of
Various Clients

Bedford Local Plan 2030 Delivery Assessment

District Wide

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

September 2021



Prepared by:	[REDACTED]
Checked by:	[REDACTED]
Approved by:	[REDACTED]
Date: September 2021	Office: Bedford

Strategic Planning Research Unit

**V1 Velocity Building
Ground Floor
Tenter Street
Sheffield
S1 4BY**

Tel: 01142 289190

**Broad Quay House (6th Floor)
Prince Street
Bristol
BS1 4DJ**

Tel: 01179 058850

**4 Abbey Court
Fraser Road
Priory Business Park
Bedford
MK44 3WH**

Tel: 01234 832740

DLP Consulting Group disclaims any responsibility to the client and others in respect of matters outside the scope of this report. This report has been prepared with reasonable skill, care, and diligence. This report is confidential to the client and DLP Planning Ltd accepts no responsibility of whatsoever nature to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk.

CONTENTS	PAGE
1.0 Introduction and Purpose	4
2.0 Review of the Council’s Published Position	5
3.0 Indicative Up-To-Date Supply Position at 1 April 2021.....	8
4.0 Indicative Supply at 1 April 2023	16

1.0 INTRODUCTION AND PURPOSE

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

2.0 REVIEW OF THE COUNCIL'S PUBLISHED POSITION

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Insert Job Number

Insert Site Name

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

Insert Job Number
Insert Site Name

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

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

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

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

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

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

With LP oversupply adjustment

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

4.0 INDICATIVE SUPPLY AT 1 APRIL 2023

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

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

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

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

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

- 4.6 We make four points:

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

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

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

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

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

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

Minimum Annual LHN

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

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

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

Stepped

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



BEDFORD

Planning / SDD / SPRU

bedford@dlpconsultants.co.uk

BRISTOL

Planning / SDD / SPRU

bristol@dlpconsultants.co.uk

EAST MIDLANDS

Planning/ SDD

nottingham@dlpconsultants.co.uk

LEEDS

Planning

leeds@dlpconsultants.co.uk

LONDON

Planning

london@dlpconsultants.co.uk

MILTON KEYNES

Planning

miltonkeynes@dlpconsultants.co.uk

RUGBY

Planning

rugby.enquiries@dlpconsultants.co.uk

SHEFFIELD

Planning/ SDD / SPRU

sheffield@dlpconsultants.co.uk





BE1564-16P – Land at Station Road, Oakley
Bedfordia Developments Ltd
Bedford Local Plan 2040 Representation
September 2021

Appendix 4 Review of Draft Sustainability Appraisal Findings obo Bedfordia Property



dynamic development solutions™

For and on behalf of
Bedfordia Property

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

Various Sites

**Prepared by
DLP Planning Ltd
Bedford**

September 2021



Prepared by:	████████████████████ ████████
Approved by:	████████████████████ ████████
Date:	September 2021

DLP Planning Ltd
4 Abbey Court
Fraser Road
Priory Business Park
Bedford
MK44 3WH

Tel: 01234 832740

DLP Consulting Group disclaims any responsibility to the client and others in respect of matters outside the scope of this report. This report has been prepared with reasonable skill, care, and diligence. This report is confidential to the client and DLP Planning Ltd accepts no responsibility of whatsoever nature to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk.

CONTENTS	PAGE
1.0 Introduction and Structure of Report.....	4
2.0 National Policy and Guidance.....	6
3.0 Overview of the Draft Sustainability Appraisal Report.....	9
4.0 Sustainability Appraisal Checklist.....	13
5.0 Criticism of the ‘Do-Nothing’ Approach	20
6.0 Failure to Provide Robust Reasons to Reject Village-Related Growth Within Strategy Options	24
7.0 Proposed Appropriate Strategy Alternative – A ‘Hybrid’ Approach.....	26

1.0 INTRODUCTION AND STRUCTURE OF REPORT

1.1 This Report has been prepared on behalf of Bedfordia Property and should be read alongside site-specific representations submitted as part of the current consultation:

- **Land at School Approach and Land east of Odell Road, Sharnbrook** (ID: 918 / ID: 932) – provision for up to 500 dwellings as part of comprehensive Masterplan Proposals incorporating new Green Infrastructure and community facilities
- **Land East of Station Road, Oakley** (Site ID: 832 / 839) – provision of c.250 dwellings together with substantial benefits to community facilities and highways infrastructure
- **Land at Marsh Lane/Rushden Road, Milton Ernest** (Site ID: 910) – relating to land proposed for allocation within the emerging Neighbourhood Plan, identifying opportunities to contribute towards additional needs for development
- **Land at Green End, Kempston** (Site ID: 1247) – located within the ‘south’ corridor parishes to provide growth well-related to the urban area including scope to make provision for specialist accommodation for older people
- **Land at Rushden Road, Milton Ernest** (Site ID: 852) – supporting the intensification and enhancement of existing commercial floorspace
- **Land at Highfield Road, Oakley** (Site ID: 1000) – providing opportunities for economic development and jobs growth adjacent existing employment provision
- **Land at Radwell Lakes, Moor Lane, Radwell** (Site ID: 703) – for the purposes of tourism, leisure, and recreation to support a prosperous rural economy
- **Land off Memorial Lane, Felmersham** (Site ID: 827) – supporting growth of between 10-30 dwellings over the plan period at this defined settlement
- **Land at Town Farm, Stocking Lane, Souldrop** (Site ID: 1245) – supporting growth of c.10 dwellings over the plan period at this defined settlement through the re-use or redevelopment of existing agricultural buildings and hardstandings
- **Manor Farm, Knotting** (Site ID: 633) – supporting the re-use or redevelopment of redundant agricultural buildings

1.2 This Report undertakes an assessment of the Council’s current evidence in terms of the assessment of reasonable alternatives in the Council’s Draft Sustainability Report (May 2021), prepared to inform the Draft Plan Strategy Options Consultation.

1.3 This Report provides a summary of national policy and guidance together with best practice and sets out an overview of the draft Sustainability Appraisal. The Report considers the Council’s SA Scoping exercise and identification of reasonable alternatives and undertakes review of the assessment findings regarding the effects of different strategy options, taking account of the Sustainability Appraisal Framework prepared to inform this exercise.

1.4 In summary, this Report identifies that the Sustainability Appraisal does not assess individual site options and thus provides no standalone basis to support the selection or rejection of

potential locations for growth or the Preferred Strategy options, without appropriate modification.

1.5 In-particular, the Council's rejection of **Option 3c** (including village-related growth) is not justified. While some aspects of those Preferred Options that focus on development in the A421 corridor with growth in 'east' and south parishes are supported, with reservations, the following observations are key:

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

1.6 The conclusions of the Report provide alternative assessment findings for a '**hybrid**' scenario that would contribute towards the achievement of sustainable development through village-related development outside of the A421 corridor, delivering a greater overall balance of net gains in accordance with national policy and guidance.

1.7 Our client's combined opportunities summarised in Paragraph 1.1 above are individually and collectively consistent with the '**hybrid**' approach endorsed on their behalf. Each should thus be subject to further detailed testing as part of strategy options and for the purposes of site selection.

2.0 NATIONAL POLICY AND GUIDANCE

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

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

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

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

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

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

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

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

2.10 This allows consideration of alternatives to **need/demand**, the **mode/process** of achieving the strategy, **locations** for change and predicting how the **phasing/implementation** may impact on the Sustainability Appraisal’s objectives. The strategy within the adopted Local Plan 2030 was not subject to a robust assessment of alternatives in terms of the level of development and how this should be provided for to meet a greater proportion of needs over a longer plan period.

2.11 The Council’s testing of strategy options as part of this consultation has been subject to similar arbitrary constraints in seeking to reject flexibility in the approach towards village-related growth that would provide additional flexibility and delivery of a greater proportion of increased needs in the period to 2030.

2.12 The Courts have further emphasised that reasons for selecting the preferred land use allocations and the rejection of alternatives must be given and inform the justification for the

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

Council's site selection process. In *Save Historic Newmarket v. Forest Heath DC* [2011] (J.P.L. 1233), where the primary ground of challenge was that the Core Strategy and accompanying SA/SEA Environmental Report did not explain which reasonable alternatives to the proposed policies [or sites] had been considered and why they had been rejected. Collins J considered the requirement to consider alternatives in the context of an iterative Plan making process (various drafts consulted upon, sifting the options, then final draft consulted upon, examined, and adopted) and held that:

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

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

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

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

3.0 OVERVIEW OF THE DRAFT SUSTAINABILITY APPRAISAL REPORT

(a) Overall Approach

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

appropriate or positively prepared.

- 3.7 These representations on the Council's Sustainability Appraisal, when read in the context of issues with the emerging Plan as a whole, demonstrate that the Council's current position is inconsistent, and that further testing of 'hybrid' strategy options cannot be ignored even with recognition of the role of the A421-based corridor over the Plan period.

(b) Options for the Amount of Growth

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

(c) Options for Components/Strategy for Distribution of Growth

- 3.12 The Council's approach to test components of growth ahead of strategy options (summarised

at Paragraph 7.8 of the draft SA) but without conclusions following individual site and settlement-level assessments fundamentally undermines the exercise of testing reasonable alternatives. The assessment does not represent a realistic or robust measure for how these components perform in principle.

3.13 The 'village-related growth' component treats all settlements in the same manner as part of a general approach. The assessment of the A421 transport corridor component is even more problematic as while only one set of appraisal findings for this component are included at Appendix 3 of the SA it in fact comprises a number of separate elements which are not distinguished within the assessment, namely:

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

3.14 It is plain that the A421-based corridor is a 'hybrid' of locational characteristics that can all support contributions towards sustainable development. What the Council's assessment does not do, however, is distinguish what proportion or specific findings for significant effects for growth in the A421-corridor result from the ability to provide for development in those parishes listed within its geography (and which cover settlements that the Council already accepts as important in the hierarchy). Without the opportunity to support growth in these locations, which is in-effect and by definition village-related growth, the significant effects of development related only to rail-based investment and new settlements would be different.

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

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

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

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

- 3.16 It is therefore relevant to the Council's own assessment findings that the contribution towards sustainable development from the A421 corridor are dependent on supporting the role and function of existing centres. The exact nature of positive effects will be site-specific but logically will be greatest where the capacity for growth exists and specific benefits can be provided.
- 3.17 In effect the Council is ignoring the evidence of its own settlement hierarchy and existing patterns of development at Key Service Centres and Rural Service Centres that contribute to the sustainability of growth in the A421 corridor. While the prospect of future investment and further improved transport links complement these opportunities, the reality is that the existing characteristics of settlements within the corridor have been shaped by their existing connections and how this contributes to their role and function.
- 3.18 There are at least three major implications of this:
- Inclusion of the 'east' and 'south' transport corridor parishes within the A421-corridor component by definition reduces the component of growth assessed as 'village-related' elsewhere in the borough (and would also, by definition, reduce the Council's perception of negative effects associated with that component)
 - The potential positive effects ascribed to village extensions in the east and south corridor parishes are not limited only to Key Service Centres and Rural Service Centres within the corridor. Similar benefits can be secured at other centres, which are acknowledged to be amongst the most sustainable locations in the borough and where growth, if supported, would nonetheless comprise a relatively minor proportion of the overall strategy.

4.0 SUSTAINABILITY APPRAISAL CHECKLIST

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

Table 1: Review of Sustainability Appraisal Checklist - Relevant Issues

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

	<p>options. The Council has provided no reasons to reject identifying levels of growth in each component of a 'hybrid' option determined by the requirements and site-specific opportunities within individual settlements.</p>
<p>10. Realistic alternatives are considered for key issues, and the reasons for choosing them are documented.</p>	<p>The draft Sustainability Appraisal has undertaken no detailed assessment of site-specific reasonable alternatives and their potential contribution towards sustainability objectives.</p> <p>Reasonable alternative sites are required to undergo the same level of analysis as the preferred option in order to establish the most suitable option.</p> <p>In providing reasons to reject broad components of growth and strategy options, tested on a 'one-size fits all' approach to levels of development in individual settlements, the Council is precluding the objective assessment of site options to contribute towards the SAs key issues and objectives.</p>
<p>12. The sustainability effects (both adverse and beneficial) of each alternative are identified and compared.</p>	<p>No testing has been undertaken to reflect the potential sustainability effects of a 'hybrid' strategy. The approach in the draft Sustainability Appraisal also precludes the ability to test the effects of alternatives to a stepped trajectory and potentially (subject to the evidence base for strategic locations for growth) either provide flexibility and contingency to levels of growth or provide a genuine alternative that would ensure</p>

	<p>minimum local housing needs <i>are</i> met within the plan period.</p>
<p>13. Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained.</p>	<p>The draft Sustainability Appraisal makes no reference to the emerging Oxford-Cambridge Arc Spatial Framework. Specifically, it makes no reference to the requirement in national policy to consider a plan period to 2050. The draft Sustainability Appraisal lacks the necessary evidence to support assumptions for delivery to 2040.</p> <p>Further inconsistencies relate to the Council’s evidence base and Sustainability Appraisal for the Local Plan 2030. The Council has previously identified that options to meet the Local Plan 2030’s housing requirement over the period to 2035 providing for higher growth in villages would be “just as sustainable” as the new village option that was selected in January 2018 (see Jan 2018 SA Option 8, 19 and 33). The Council has provided no adequate alternative reasons to reject village-related growth in the emerging Preferred Options.</p>
<p>14. Reasons are given for selection or elimination of alternatives.</p>	<p>No reasons are given for the rejection of a ‘hybrid’ strategy and no reasons are given to reject the ‘village-related’ component of growth. The Council will be unable to substantiate or repeat these reasons (and specifically their absence) when undertaking the detailed appraisal of sites that is still required.</p>

Baseline Information	
<p>15. Relevant aspects of the current state of the environment and their likely evolution without the plan are described.</p>	<p>Relevant sustainability issues are informed by the Council's July 2020 Scoping Report. However, this will require review upon completion of key parts of the evidence base (including Settlement Hierarchy Study and Open Space Study). There is no reference to the issues and opportunities created by made/emerging Neighbourhood Plans and likely deficits in local community infrastructure and services over the extended Plan period to 2040.</p>
<p>16. Characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan where practicable.</p>	<p>The draft Sustainability Appraisal report makes no reference to the Duty to Cooperate or the characteristics of committed and emerging proposals in neighbouring areas (notably Huntingdonshire and Central Bedfordshire). The Central Bedfordshire Local Plan 2015-2035 itself requires early review together with proposing significant growth at Marston Vale. This is likely to have effects when assessing strategic-scale alternatives at Kempston Hardwick, Stewartby and New Settlements at Wyboston and/or Little Barford in terms of potential cumulative impacts and barriers to phasing/implementation.</p>
<p>17. Difficulties such as deficiencies in information or methods are explained.</p>	<p>As previously mentioned, there are key pieces of information missing to justify the outputs of the assessment of options and the level of development at various locations.</p>

Prediction and Evaluation of Likely Significant Effects	
<p>18. Likely significant social, environmental, and economic effects are identified, including those listed in the SEA Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage, and landscape), as relevant.</p>	<p>The likely significant environment effects of reasonable alternative options have not been correctly or accurately assessed.</p> <p>No site options have yet been assessed in the SA process. The Council has relied on a general, 'one-size fits all' approach to assessing components of growth that does not consider the potential for the difference in effects between individual settlements. The Council has not, for example, differentiated the different elements of A421-based growth in assessing this component (i.e., rail-based growth vs settlement-level growth in the east/south corridor parishes).</p> <p>The conclusions on significant effects for each component of growth and strategy option are derived using a different (and narrower) set of indicators in the SA Framework (Appendix 1) than is proposed for assessing individual sites. This is an inconsistent approach and the full testing of effects for individual site options will not support the reasons given to select/reject entire components of growth in the preferred strategy options.</p>
<p>19. Both positive and negative effects are considered, and where practicable,</p>	<p>While positive and negative effects are given for strategy options and components of growth there is no indication on the duration of these or potential barriers to</p>

<p>the duration of effects (short, medium, or long-term) is addressed.</p>	<p>phasing/implementation. This also reflects the absence of individual site assessment and the lack of consideration of detailed mitigation options at this stage.</p> <p>An objective approach to undertaking this element of the SA cannot be provided using a 'one-size fits all' approach to levels of development in each component of growth and at individual settlements. Variation in these factors as part of a 'hybrid' strategy has scope to maximise the contribution towards sustainable development and limit any adverse effects to short-term/minor in nature, given the proportionally limited levels of village-related growth that would support an appropriate strategy.</p>
--	--

5.0 CRITICISM OF THE 'DO-NOTHING' APPROACH

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

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

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

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

- **Development of brownfield land is unlikely to occur unless the site is particularly well located or does not require remediation.** This makes the case that unviable poorly located brown field sites will not be developed. If sites are poorly located the question is, should they be developed? If they are unviable then even an allocation will not alter this and bring them forward.
- **This also assumes that there will be the delivery of sites:** In terms of the Preferred strategy options for the Local Plan 2040 the difference between any benefits associated with plan-led approaches is likely to be moderated (or reversed) by their long-term development timescales, reliance on a stepped trajectory and potential barriers to delivery whereas ‘do minimum’ scenarios would offer genuine opportunities to meet the uplift in needs that is required now.

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

5.5 In reality the exact opposite is likely in terms of development outcomes. Development in the Borough’s most sustainable settlements (outside of Bedford) is more likely to secure policy-compliant levels of affordable housing contributions. This is different to known and likely viability constraints and Town Centre sites and within large-scale strategic growth locations where the delivery of affordable housing is suppressed. Likewise, the conclusion of negative effects for specialist housing for older people is not justified. The Council has not set out any policy position on overall levels of need or whether these could be provided within the preferred strategy options (likely necessitating a ‘general’ policy approach to encourage provision on larger sites).

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

- **Objective 13 (Community Services and Facilities) (Uncertain):** if development is in the form of village extensions, this option may help support existing village community facilities. This is consistent with the assessment findings for the village-related component of growth (Appendix 4) and strategy options including village-related growth (Appendix 5 – including **Option 3c**).
- **Objective 7 (Encourage and Support Physical Activity) (Negative):** *“Dispersed growth is unlikely to encourage travel by non-car modes and increase travel to the*

urban area” – we disagree with this conclusion as once again appropriate extensions could also delivery improvements to open space and recreation and provide good access to day-to-day services and facilities. For option findings including village-related growth (including **Option 3c**) the finding for the same objective is ‘Uncertain’

- **Objective 5 (Economic Growth) (Neutral):** Business development is likely to locate near to existing businesses and areas with good accessibility – we agree with this conclusion as some growth at Key Service Centres and Rural Service Centres would enhance local employment opportunities. However, for the village-related growth component the Appraisal findings show negative effects, which is inconsistent.
- **Objective 2 (Biodiversity) (Negative):** ‘Do nothing’ appraisal findings note minor adverse impacts should be capable of mitigation and could lead to the creation or enhancement of habitats. The appraisal finding for the ‘do nothing’ scenario is the same as for all spatial options tested in Appendix 5 (all shown potential negative effects) and the village-related component of growth. The appraisal fails to reflect that only appropriate greenfield sites, primarily in Key Service Centres and Rural Service Centres, are likely to offer site-specific opportunities to enhance natural assets through the provision of additional land or mitigation measures.
- **Objective 1 (Air Quality) (Negative):** Effects associated with increased number of journeys and private car movements. A lower magnitude of negative effects is identified for the ‘do nothing’ scenario than for the strategy options including village-related growth in Appendix 5 (including **Option 3c**) identifying major negative effects. This is inconsistent given that the ‘do nothing’ scenario anticipates more dispersed growth. The village-related component itself (in Appendix 4) also only identifies some negative effects. The conclusions regarding testing of strategy options therefore fail to reflect that village-related growth will typically be related in areas away from existing poor air quality and with good access to day-to-day facilities. The conclusions relating to the adverse effects of strategy options including village-related growth are inconsistent with the SA Framework for sites (Appendix 1) that recognises that the accessibility of services will reduce any harmful effects.
- **Objective 15 (Sustainable Travel) (Major Negative):** The ‘do nothing’ appraisal findings are the same as the Appendix 4 and Appendix 5 conclusions on harmful effects associated with village-related growth and strategy options that include this component. The Council suggests this aspect of ‘do nothing’ strategy options perform no worse than the reasons it has given to exclude any element of village-related growth from its preferred options. We disagree. The ‘do nothing’ scenario is distinct from strategy options to provide for appropriate levels of growth in Key Service Centres and Rural Service Centres to sustain and enhance their role and use of existing facilities (which are specifically recognised in the SA Framework for individual sites). The Council identifies positive effects for all elements of the A421-based component of growth and some negative effects for New Settlements as part of the appraisal findings for this objective. This fails to reflect the uncertainty that any benefits are likely to be long-term and subject to constraints regarding phasing, viability and achieving a population density sufficient to support new services and facilities and uptake of public transport options.

5.7 In reality, the negative effects associated with failing to provide for opportunities that

contribute towards the achievement of sustainable development are likely to be more severe as part of the Council's Preferred Options (which exclude village-related growth outside of transport corridor parishes) than its own testing of a 'do nothing' strategy. This would enable a more flexible distribution of growth, in accordance with the presumption in favour of sustainable development, allowing site-specific benefits of development to be realised.

- 5.8 The Council's Preferred Options, which effectively put an embargo on further growth in the majority of Key Service Centres and Rural Service Centres, act contrary to the interests of sustainable development over the Plan period to 2040 and beyond. The negative consequences of this are magnified where Neighbourhood Plans have provided for some growth under the requirements of the Local Plan 2030 but have fundamentally failed to address local priorities for matters including community, social and green infrastructure and enhancing existing facilities and job opportunities, where appropriate.

6.0 FAILURE TO PROVIDE ROBUST REASONS TO REJECT VILLAGE-RELATED GROWTH WITHIN STRATEGY OPTIONS

- 6.1 The Sustainability Appraisal provides inaccurate and insufficient reasons to reject strategy options providing for village-related growth, particularly **Option 3c**. The summary table of the findings for components of growth at pp.66 of Appendix 3 suggests major negative effects against certain objectives including objective 3 (climate change) and objective 15 (sustainable travel) for any growth in Key Service Centres or Rural Service Centres. In this part of the assessment the Council does not appear to distinguish settlements relative to their relationship with A421-based growth (i.e., 'east' and 'south' corridor parishes).
- 6.2 We fundamentally disagree with the Council's assessment of the village-related growth component, given that during preparation of the current Local Plan higher levels of growth (up to 5,100 units 2015 to 2035) at the Borough's most sustainable centres was considered just as sustainable as New Settlement options. We also consider that testing of this component is undermined by a 'one-size fits all' approach to assessing settlements within the hierarchy with no attempt to distinguish effects based on varying levels of growth at individual settlements (or including some and excluding others).
- 6.3 In testing strategy/spatial options (Table at pp.111-112 of Appendix 5) the Council has taken a more proportionate approach to distinguishing potential effects. There are in-fact only significant differences between **Option 3c** (providing support for village-related growth amongst other components) and the Council's Preferred Options 2a-2d in relation to Objectives 1, 3 and 15 (air quality, climate change and sustainable transport). The lack of distinction in effects across other objectives reflects the absence of any detailed site testing at this stage and reflects the uncertainty of positive effects within the other components of growth.
- 6.4 The testing of strategy options has regard to the scale and relative proportion of growth in each component. It is therefore appropriate that, as per the findings of Objective 3 for example, the potential negative effects for climate change related to a proportion of village-related growth have been moderated downwards from the findings for this specific component. This reflects the relatively minor contribution to the overall strategy and the opportunity for net gains across other parts of this objective (e.g., improving access to day-to-day services, renewable energy generation and energy-efficient design).

- 6.5 It is, however, fundamentally inconsistent that the **Major Negative** effects associated with Objectives 1 (air quality) and 15 (sustainable travel) have not been moderated in a similar way. Major adverse impacts on air quality are **only** identified for Options 3a-3c and Option 6. The Council is indicating that Option 3c will perform **worse** than the ‘do-nothing’ scenario. This is despite no individual component of growth in Appendix 3 being associated with major adverse effects for **Objective 1** (air quality) and despite the fact that as part of strategy options, and managing the relative proportions of growth, the process of site selection will lead to the inclusion of sites and locations with the least impacts.
- 6.6 Likewise for **Objective 15** (sustainable travel) there is no justification to state that **Options 3b, 3c and Option 6** would be associated with major negative effects and to rely on these limited reasons to reject village-related growth as a component of the strategy.
- 6.7 The Council’s position is further undermined by the fact that it relies on indicating the specific percentage of ‘village-related’ growth in testing each strategy option (35% in the case of **Option 3c**) when concluding on the extent of adverse effects. There are three principal issues with this:
- The 35% total quoted is not ‘fixed’ – this could be changed by altering the specific expected levels of growth at individual settlements upwards or downwards, or by excluding some altogether some settlements where the most significant impacts may be associated; and
 - The 35% total is based on the expected contribution from the village-related component of growth **at all Key Service Centres and Rural Service Centres including those in the ‘east’ and ‘south’ corridors** – the Council’s own evidence indicates different effects associated with those locations aligned to A421-based growth. This means that the proportionate scale of growth (and thus adverse impacts, if any) outside of these corridors is materially lower than the total quoted by the Council in its assessment; and
 - The 35% (or any altered figure) is also associated with a dimension of potential positive effects within the strategy options. This will not be realised or contribute to the overall net effects for sustainable development if village-related growth is excluded altogether (as per the Council’s Preferred Options).
- 6.8 To summarise, there can be no support for the Council’s conclusions in the draft Sustainability Appraisal that a ‘hybrid’ approach providing the basis for further testing of village-related growth would not provide the basis for an appropriate strategy. It is essential that a hybrid approach is tested before, for example, concluding the requirement for a stepped trajectory and delaying meeting increased housing needs until beyond 2030.

7.0 PROPOSED APPROPRIATE STRATEGY ALTERNATIVE – A ‘HYBRID’ APPROACH

- 7.1 These representations propose an alternative ‘hybrid’ spatial strategy. This is consistent with the Council’s evidence base for the emerging Local Plan 2040; would overcome the soundness issues identified with the Council’s Preferred Options; and would comprise an appropriate strategy for the purposes of Paragraph 35(b) of the NPPF2021.
- 7.2 The ‘hybrid’ strategy recognises that there is no arbitrary distinction between ‘village-related’ growth and support for development in the ‘east’ and ‘south’ corridor parishes in terms of their capacity to contribute towards sustainable development. The benefits of ‘village-related’ development do not suddenly materialise only where Key Service Centre and Rural Service Centres are located in the A421 corridor and do not evaporate altogether outside of it.
- 7.3 The Council expressly recognise this in the evidence base for the current Development Plan. In the current Preferred Options, it has taken an inconsistent approach to assessing the effects of the ‘village-related’ development component by reaching different conclusions for exactly the same settlements (in the ‘east’ and ‘south’ corridors) when they are assessed as part of the Preferred Options as opposed to other strategy options (e.g., **Option 3c**).
- 7.4 The ‘hybrid’ option assigns the ‘village-related’ growth component only to those settlements outside of the ‘east’ and ‘south’ corridors. Levels of development, for the purposes of an indicative distribution, have been retained at 500 units in Key Service Centres and 35 units in Rural Service Centres albeit these are arbitrary figures and should be determined on a case-by-case basis. Wixams has been excluded from the total for Key Service Centres (reflecting its inclusion in the locations for rail-based growth). The only exception, taking account of this, is an increase of 215 units in the distribution to Oakley based on our recommendation for it to be reclassified as a Key Service Centre and growth east of Station Road being specifically supported.
- 7.5 For the A421-based components of the strategy the total distribution to the ‘east’ corridor parishes are retained at the figure of 750 dwellings in the Council’s Preferred **Option 2d**.
- 7.6 In terms of the ‘hybrid’ strategy this could accommodate greater flexibility in terms of large-scale strategic growth included in the strategy options. We have included the Council’s minimum figures for inclusion of rail-based growth at Kempston Hardwick/Stewartby and

New Settlements in either the A6 or A421 corridor, which is more likely to reflect realistic timescales for development.

7.7 Including both components would comfortably exceed the minimum 12,500 units required from additional allocations, with an appropriate buffer for flexibility and contingency (particularly in terms of the prospects for meeting increased needs before 2030). There is no reason higher quanta could not be included as part of an extended plan period. Equally, this could allow some settlements to be excluded from further village-related growth albeit we would not recommend this where Neighbourhood Plans being prepared have failed to address important strategic priorities (as at Oakley and Sharnbrook, for example).

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

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

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

7.9 We have utilised the ‘hybrid’ strategy to consider an assessment of effects in-line with the Council’s Sustainability Appraisal framework. When the ‘hybrid’ strategy is compared with the standalone findings for growth components and the Council’s Options **2d** and **3c**, as well as the ‘do nothing’ scenario, it is apparent that the potential benefits towards sustainable development are enhanced. This is as a result of recognising that the potential negative effects the Council assigns to village-related growth are incorrect and, in any event, inaccurate because it ignores the location of some Key Service Centres and Rural Service Centres within the A421 corridor.

7.10 It also recognises that some the benefits of what is in reality ‘village-related’ growth in the ‘east’ and ‘south’ transport corridors will be shared across settlements elsewhere in the hierarchy. The results are summarised in Table 3 below:

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

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

7.11 These findings reinforce the essential requirement for the Council to update its Preferred

Options to reflect a hybrid strategy in order to provide a sound basis for preparation of the Local Plan 2040.



BEDFORD

Planning / SDD / SPRU

bedford@dlpconsultants.co.uk

BRISTOL

Planning / SDD / SPRU

bristol@dlpconsultants.co.uk

EAST MIDLANDS

Planning/ SDD

nottingham@dlpconsultants.co.uk

LEEDS

Planning

leeds@dlpconsultants.co.uk

LONDON

Planning

london@dlpconsultants.co.uk

MILTON KEYNES

Planning

miltonkeynes@dlpconsultants.co.uk

RUGBY

Planning

rugby.enquiries@dlpconsultants.co.uk

SHEFFIELD

Planning/ SDD / SPRU

sheffield@dlpconsultants.co.uk



IEMA Transforming the world to sustainability



RTPI
Chartered Town Planner



BE1564-16P – Land at Station Road, Oakley
Bedfordia Developments Ltd
Bedford Local Plan 2040 Representation
September 2021

Appendix 5 Review of the AECOM “Bedford Borough Transport Model” – SDD Consultants

TECHNICAL NOTE: JOB REF BE5229-18PD

Re: Bedford Borough Transport Model – Technical Note Review
Date: August 2021
Subject: Review of “Bedford Borough Transport Model” report (AECOM, April 2021)
Client: Bedfordia Developments Ltd

1.0 Introduction

1.1 This Technical Note (Note) has been prepared by DLP Planning’s Sustainable Development and Delivery (SDD) team on behalf of Bedfordia Developments Ltd in order to provide a review of the Bedford Borough Council Transport Model report ‘New Settlements and the A6’ (April 2021) which was prepared by AECOM on behalf of Bedford Borough Council.

1.2 The purpose of the transport model and subsequent report is stated as being as follows:

“to develop a multi-modal transport model (the Bedford Borough Transport Model, or BBTM) covering the borough and areas adjacent to the borough in neighbouring authorities. This model has been developed to assess the forecast impacts of growth set out in spatial scenarios for the new Local Plan for growth through to 2040 and to assess potential mitigation transport schemes to assist in delivering this growth.”

As part of the development of the new Local Plan for Bedford Borough, potential new settlements to the north of Bedford along the A6 corridor have been identified, namely the proposed developments at Twinwoods (to the south-east of Milton Ernest) and Colworth (to the north-west of Sharnbrook). This technical note details the modelling methodology and forecast results of an initial transport assessment of the proposed developments.

As part of this assessment, an initial set of mitigation measures defined by Bedford Borough Council has been assessed and these have been supplemented with further, additional proposed mitigation measures developed by AECOM. These additional proposed mitigation measures have considered the forecast locations of delay and congestion within the highway network and have considered only schemes which could be ‘deliverable’ in the context of the proposed development.”

1.3 This technical review focuses upon whether any assessment has been made of a scenario whereby growth is dispersed across Bedford at existing villages, or whether the focus is upon solely the creation of new settlements. The key issues reviewed are as follows:

- How constrained does the AECOM transport model state the existing highway network is, and how accurate is their assessment?
- In terms of village-related growth in North Beds the Local Plan Options indicate an additional 500 units at Sharnbrook/Bromham/Clapham and 35 at Oakley and Milton Ernest (over and above current NDP requirements). Has the AECOM study looked at

TECHNICAL NOTE: JOB REF BE5229-18PD

any flexibility in those numbers, or any potential growth in jobs or demand for community facilities (specifically expansion at Lincroft Academy in Oakley)?

- The Transport Model report assesses potential New Settlements at Twinwoods and Colworth. However, does it look at different levels of village-related growth including and excluding these?
- Does the report mention at all the proposed competing “Site 901 - Hill Farm” site and the associated new access roundabout proposed off the A6? What impact would this have on AECOM assumptions should this junction have been omitted from assessment?

- 1.4 For reference, **Figure 1** shows the location of the “Site 901- Hill Farm” site and the applicants land at “Site Ref 620” and “Site Ref 527” adjacent to the A6. Whilst Figure 1 is not included with the AECOM report, it demonstrates the proximity of the sites to the A6 in order to determine whether an assessment has been made of these sites.

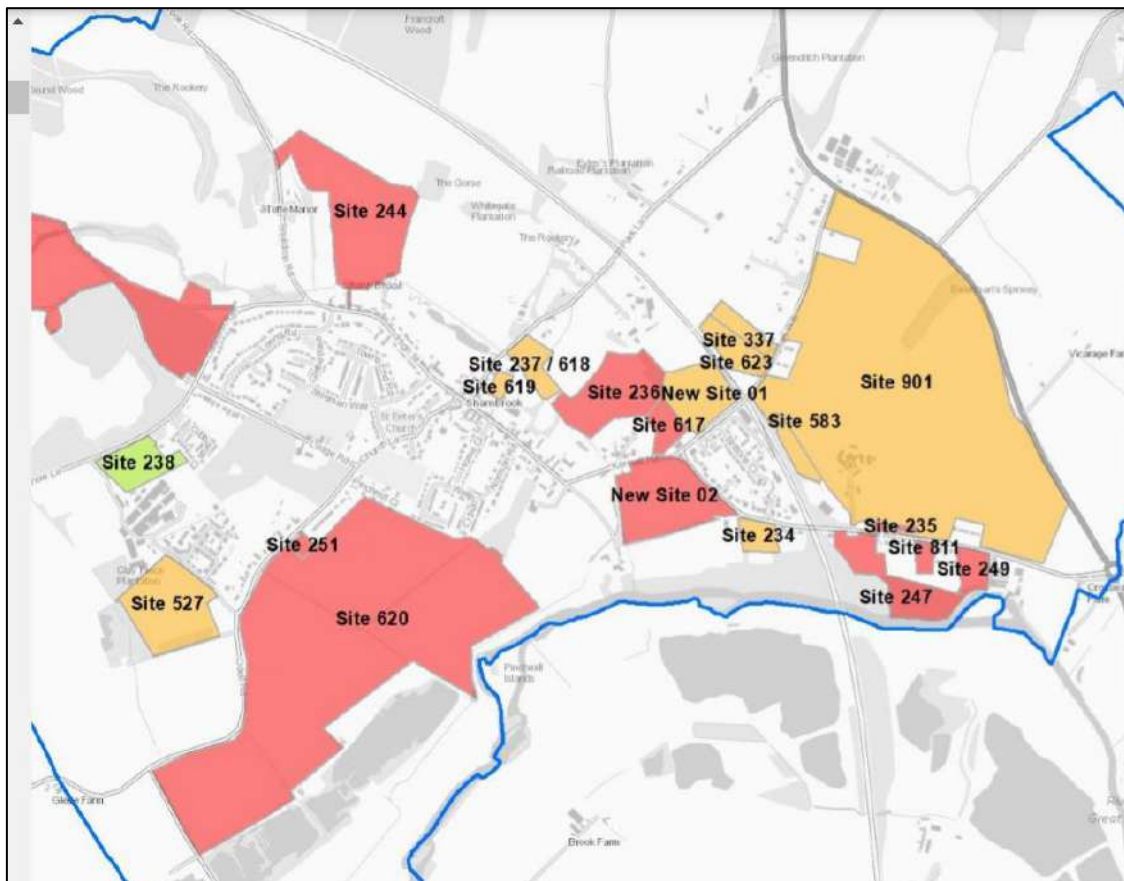


Figure 1: Site 901 – Hill Farm Location Plan

2.0 Review of Existing Highway Network

- 2.1 Within the AECOM report, the ‘reference case’ is classed as being the baseline for assessment. However this ‘reference case’ year is actually 2030. This ‘reference case’ represents the scenario whereby there is no further growth beyond that identified in the current / adopted Local Plan 2030.

TECHNICAL NOTE: JOB REF BE5229-18PD

- 2.2 The growth in housing and employment within Bedford Borough is based upon committed developments and growth as set out in the adopted Local Plan 2030.
- 2.3 Paragraph 2.2.1 of the AECOM reports states that:
- “Further details on the underlying assumptions and outturn changes in land-use from the 2018 base year model for the reference case can be found in Section 2 of ‘BBTM Draft Local Plan Assessment Report.’”*
- 2.4 Therefore, throughout the report, the baseline / ‘reference case’ referred to is always 2030, and no information is provided on the “current” highway conditions.
- 2.5 In addition to the above, the ‘2030 reference case’ makes assumptions regarding the changes to transport infrastructure from 2018. The list of transport improvement schemes was provided by Bedford Borough Council, with assumptions for transport schemes outside of the borough sourced from assumptions provided by Highways England and through consultation with neighbouring authorities.
- 2.6 A summary of the highway infrastructure schemes (22 schemes) which are included within the baseline ‘2030 reference case’ are provided. However, none of these highway improvement schemes are within the vicinity of Sharnbrook or the A6 to the east of Sharnbrook.
- 2.7 The baseline ‘reference case’ is therefore based upon the 22 highway infrastructure schemes being implemented. However, no confirmation is provided regarding the sources of funding for such schemes, and whether this could preclude their delivery. The delivery of these works as a baseline assessment cannot be guaranteed – in particular where they may also be reliant on the acquisition of third-party land.
- 2.8 Should the above highway improvement schemes not be delivered, the reassignment of traffic could impact upon congestion at key locations across the highway network. Therefore, should any schemes aimed at relieving congestion not be delivered, the future assessment of the operation of the highway network assessed in the 2030 ‘reference case’ could be skewed.
- 2.9 Notwithstanding the above, Table 3.9 of the AECOM report provides a summary of the forecast average junction delay at key junctions across Bedford Borough. for both 2018 and 2030 ‘reference case’ scenarios. In relation the highway network in the vicinity of Sharnbrook, junction delay data is provided at the following key junctions:
- A6 / Mill Road (Sharnbrook) A6 (N)
 - A6 / Mill Road (Sharnbrook) Thurleigh Road
 - A6 / Mill Road (Sharnbrook) A6 (S)
 - A6 / Mill Road (Sharnbrook) Mill Road
 - A6 / Souldrop Lane
- 2.10 At the above locations, the maximum delay is 6 seconds in the 2018 scenario and 7 seconds in the 2030 reference case AM peak hour scenarios and this occurs at the A6 / Mill Road (A6 north) roundabout junction.
- 2.11 In relation to Volume-Capacity ratios at the above locations, Tabel 3.13 shows the maximum capacity of the junctions reaches 50% during the peak period. Once again this occurs at the A6 / Mill Road roundabout.

TECHNICAL NOTE: JOB REF BE5229-18PD

- 2.12 No assessment is provided of the dumbbell roundabouts off the A6 in the vicinity of Oakley, nor the junctions with Highfield Road further north along the A6. Whilst these do not comprise at-grade junctions directly along the A6, they do represent the points at which any future traffic growth within Oakley would access the A6. Ordinarily, it would be expected that an assessment at the junction where the on-slip / off-slip meets the A6 would be undertaken. There is no explanation as to why these junctions in the vicinity of Oakley have not been assessed, or whether this is because BBC do not envisage capacity issues at these locations. As part of any future development in the vicinity of Oakley, detailed capacity assessments of these junctions adjacent to the A6 would be required to determine whether more localised highway mitigation improvements are indeed required.
- 2.13 In the wider context, the greatest delay is experienced at the A6 Clapham Road / Manton Lane junction to the immediate northwest of Bedford. However Table 2.2 sets out that the proposed infrastructure mitigation is due to be complete at this location in 2021 which seeks to improve the operation of this junction.

3.0 Village-Related Growth

- 3.1 As part of the AECOM study, it is stated at Paragraph 2.2.2 that the 2030 'Reference Case' represents:

"The scenario where there is no further growth beyond that identified in the current, adopted Local Plan 2030. Development scenarios being considered as part of the new Local Plan 2040 and key individual developments, such as the proposed Twinwoods and Colworth developments, are added to this reference case."

- 3.2 Within Bedford Borough, the growth in housing and employment is based upon committed developments and growth set out in the Local Plan 2030. Population forecasts are derived using the forecast housing data, information on observed base year average household sizes, and the forecast change in average household sizes set out in the Department for Transport's TEMPro v7.3 forecasts.
- 3.3 However no detail is provided as to whether an assessment has been made of solely village related growth occurring (i.e development at Sharnbrook, Milton Ernest and Oakley), and whether any sensitivity testing has been undertaken of different levels of growth occurring at villages across Bedford.
- 3.4 In addition to the 2030 'reference case' scenario as set out above, additional forecast scenarios have been assessed for year 2040 and 2050. These scenarios are based upon different levels of growth at Twinwoods and Colworth only, and whether each / both sites are brought forward.
- 3.5 However, no sensitivity testing has been undertaken whereby the two new settlements at Colworth and Twinwoods do not come forward, and instead housing growth development at other existing villages across Bedford Borough.
- 3.6 The focus of the AECOM report is on assessing the forecast impacts of proposed development along the A6 corridor to the north of Bedford – namely the proposed schemes at Twinwoods and Colworth. The future year assessments at 2040 and 2050 assume that either Colworth or Twinwoods would come forward. There is no option assessed whereby a dispersed pattern of smaller housing schemes are provided across the borough instead of the large settlement options.

4.0 Assessment of Local Plan site ref “901 – Hill Farm”

4.1 Within the AECOM report, no specific reference is made to the site at Hill Farm, nor its associated proposed access via a new roundabout onto the A6. **Figure 2** shows the location of residential developments between 2018 and 2040 that form part of the ‘reference case’ assumptions by AECOM. No development site is shown between the railway line and the A6 to the east of Sharnbrook (i.e where Site 901 Hill Farm is proposed).

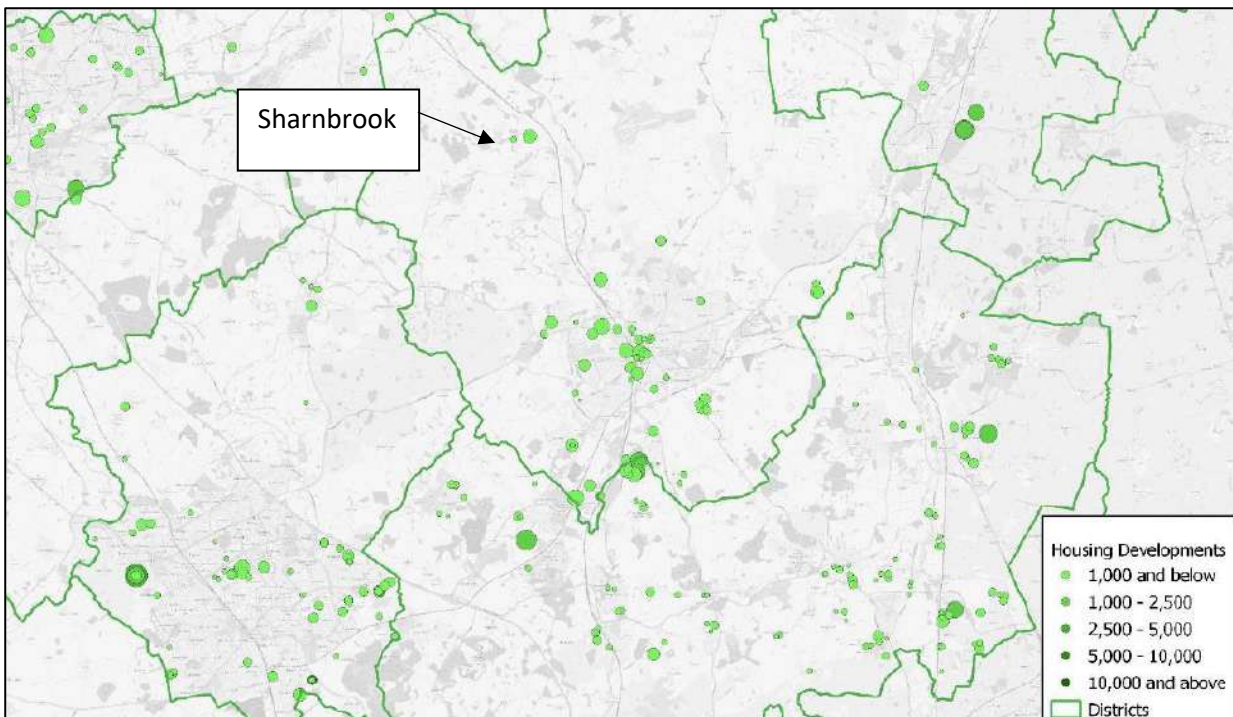


Figure 2: AECOM Reference Case residential developments (2018 – 2040)

- 4.2 In terms of new access points onto the A6, traffic has only been loaded onto the network at the proposed access points associated with the Twinwoods and Colworth developments. No assessment has been made for new traffic being loaded onto the network via a new access onto the A6 associated with the Hill Farm site. Indeed no assessment has been undertaken of only the Hill Farm / associated site access onto the A6 coming forward, excluding the two new settlements.
- 4.3 Therefore, whilst the AECOM Transport Study does take account of growth set out in the Local Plan and committed developments, no specific reference is made of the impact of the “Site 901-Hill Farm” site. The cumulative impact of traffic along the A6 corridor has been assessed in terms of junction capacity and delay, however this is not attributed to this particular site and it is not possible to assess the impact that traffic associated with Site 901 could have on the operation of the surrounding road network.
- 4.4 Whilst the AECOM traffic model excludes any sensitivity testing relating to the impact of the new roundabout, this is understandable given the early stages of assessment. The impact of the site access new roundabout on to the A6 would ordinarily be assessed on a site specific basis as part

of capacity assessments undertaken to inform the planning application for the Hill Farm Site. This would allow for an assessment of impact upon capacity on the more localised road network. However, at this stage, it is unlikely that the introduction of a new roundabout onto the A6 would have a significant bearing on the result of the AECOM traffic model which is undertaken at a 'high level'.

- 4.5 At this stage SDD's view is that it is unlikely that the new junction would result in traffic diversions or traffic being reassigned to different routes. Given its distance from existing junctions along the A6, it is unlikely that any queuing would block back to adjacent junctions.

5.0 Summary

- 5.1 The focus of the AECOM report is solely upon the assessment of growth within Bedford being provided in the form of a new settlement at "either" Colworth or Twinwoods, or both coming forward. There appears to have been no assessment has been made of the ability of the local highway network to accommodate a more dispersed pattern of growth across local villages as opposed to being solely at Colworth / Twinwoods.
- 5.2 The highway improvement schemes assessed are implemented to mitigate the impact of development at the two new settlements. There appears to be no assessment of whether mitigation measures are required on a more local level, to facilitate a more dispersed pattern of housing growth across the borough.
- 5.3 There is no justification provided within the report as to why the focus of assessment has been focused on the development at Colworth / Twinwoods only, or whether further work has been undertaken to determine that this is the preferred approach to housing delivery (as opposed to a dispersed approach) across the borough from a highways capacity perspective.



BEDFORD

Planning / SDD / SPRU

bedford@dlpconsultants.co.uk

BRISTOL

Planning / SDD / SPRU

bristol@dlpconsultants.co.uk

EAST MIDLANDS

Planning/ SDD

nottingham@dlpconsultants.co.uk

LEEDS

Planning

leeds@dlpconsultants.co.uk

LONDON

Planning

london@dlpconsultants.co.uk

MILTON KEYNES

Planning

miltonkeynes@dlpconsultants.co.uk

RUGBY

Planning

rugby.enquiries@dlpconsultants.co.uk

SHEFFIELD

Planning/ SDD / SPRU

sheffield@dlpconsultants.co.uk



IEMA Transforming the world to sustainability



RTPI
Chartered Town Planner