

**Part B – Please use a separate sheet for each representation**

Name or organisation: CODE Development Planners Ltd

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	Evidence base documents: Sustainability Appraisal Report (April 2022), SA Report Appendices (April 2022), New Settlements Assessment Topic Paper (April 2022)	Policies Map	

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please refer to representations below.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to representations below

(Continue on a separate sheet /expand box if necessary)

**Please note.** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I have been involved in the promotion of this site throughout the preparation of the BBLP 2040 and I would be able to assist the inspector with background and contextual information.

***Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.***

# BEDFORD BOROUGH LOCAL PLAN 2040

## (REGULATION 19)

### JULY 2022 REPRESENTATIONS



Client: The Executors of the late [REDACTED]  
Project: Alington Estate, Little Barford  
LP policy ref: HOU19, Appraisal Report (April 2022), Sustainability Appraisal Report Appendices (April 2022), New Settlements Assessment (April 2022)  
LP para ref:  
Nature of comment: Support but request updated Sustainability Appraisal to update scoring  
Date: 29 July 2022

#### 1 Introduction

- 1.1 These representations are submitted on behalf of the Executors of the late [REDACTED] the owners of land at Little Barford (identified in the Bedford Borough Local Plan 2040 (BBLP 2040) evidence base documents as site 907 and Policy HOU19). The site comprises land to the east and west of Barford Road, east of the East Coast Mainline railway (ECM) and west of the Black Cat to Caxton Gibbet A428 road improvement scheme (refer to drawings 068-001-014A and 60830-PP-500B).
- 1.2 The Alington Estate – Little Barford is in a single ownership and totals 453ha. It comprises circa 309ha that will form site allocation HOU19, two areas of contingency land (one of circa 88ha and another of circa 28ha) and land included as part of the A428 Black Cat to Caxton Gibbet improvement (circa 28ha). The contingency land is available in the event that i) the route alignment chosen for East West Rail (EWR) impacts on the delivery of elements of Policy HOU19; and/or ii) additional land is required for biodiversity net gain, multifunctional green space or carbon off-setting. Drawing 60830-PP-500B identifies that not all land is proposed for built development. The western boundary of the site is defined by the River Great Ouse, whilst to the north the site shares a boundary with the RWE gas power plant and Alington Road Industrial Estate. Beyond the industrial estate, north of the existing A428 is the Huntingdonshire town of St Neots. The southern and eastern boundaries of site allocation HOU19 will be formed by the A428 Black Cat to Caxton Gibbet Road improvement scheme.
- 1.3 The site is largely in use for agricultural purposes with associated farm buildings. Along Barford Road is existing small-scale development around the Manor House, St Deny's Church, Lower Farm Barns, The Cottages and the Bungalows.
- 1.4 The site has been assessed within the BBLP 2040 Site Assessment Proforma Document (June 2021) before undergoing further assessment for the provision of a new settlement within the New Settlements Assessment Paper (April 2022). Following on from these assessments the site has been allocated



under Policy HOU19 Little Barford New Settlement of the BBLP 2040 for the provision of a new settlement to deliver at least 4,000 new homes and in the region of 4ha of employment land.

1.5 These representations are made in support of the site's allocation under Policy HOU19 and should be read in conjunction with the following documents:

- Representations to the Regulation 19 BBLP 2040 in relation to policies HOU19 and Policy TC1(S) and associated paragraphs, and paragraphs 4.12-4.13 and Table 2 of the BBLP 2040.
- Drawing 068-001-014 Rev A: Areas available for allocation, March 2022 prepared by CODE Development Planners;
- Drawing 60830-PP-500 B: Highway Access and Development Parcels – New Settlement (BBLP 2040 Reg 19 – HOU19);
- Preliminary Ecological Appraisal, September 2021 (issue 3) prepared by Southern Ecological Solutions [land west of East Coast Mainline];
- Preliminary Ecological Appraisal, July 2022 prepared by Southern Ecological Solutions [land east of East Coast Mainline line and west of A428 improvement];
- Botany Assessment of Grassland Component of Little Barford CWS, September 2021 (issue 2) prepared by Southern Ecological Solutions;
- Botany Assessment of RWE Buffer, September 2021 (issue 3) prepared by Southern Ecological Solutions;
- Transport Assessment, September 2021 prepared by Richard Jackson Ltd incorporating the following:
  - Drawing 60830-PP-014A: Sustainable travel options plan [although this drawing is embedded in the 2021 TA it has been superseded by drawing 60830-PP-018];
  - Drawing 60830-PP-017: Proposed A428 grade separated junction location;
  - Drawing 60830-S-004: Bridge at section 2 general arrangements and typical details;
  - Drawing 60830-S-005: Bridge at section 9 general arrangements and typical details;
  - Sustainable Transportation Technical Note, September 2021;
- Sustainable Transportation Technical Note Revision A, April 2022 prepared by Richard Jackson Ltd
- Drawing 60830-PP-018: Little Barford Sustainable Travel Strategy, April 2022 prepared by Richard Jackson Ltd
- Transport Technical Note, July 2022 prepared by WSP
- Site Specific Flood Risk Assessment (FRA), June 2021 (revision A) prepared by Richard Jackson Ltd;
- Surface Water Strategy, August 2021 prepared by Richard Jackson Ltd incorporating the following:
  - Drawing 60830-PP-200: Surface water strategy (sheet 1 of 5);
  - Drawing 60830-PP-201: Surface water strategy (sheet 2 of 5);
  - Drawing 60830-PP-202: Surface water strategy (sheet 3 of 5);
  - Drawing 60830-PP-203: Surface water strategy (sheet 4 of 5);



- Drawing 60830-PP-204: Surface water strategy (sheet 5 of 5);
- Services Technical Note, September 2021 prepared by Richard Jackson Ltd incorporating the following;
  - Drawing 60830-PP-100A: Existing service records (sheet 1 of 5);
  - Drawing 60830-PP-101A: Existing service records (sheet 2 of 5);
  - Drawing 60830-PP-102: Existing service records (sheet 3 of 5);
  - Drawing 60830-PP-103: Existing service records (sheet 4 of 5);
  - Drawing 60830-PP-104: Existing service records (sheet 5 of 5);
- Tree Constraints Report, December 2021 (revision C) prepared by Southern Ecological Solutions incorporating the following:
  - Tree Survey Schedule;
  - Tree Survey and Constraints Plan;
- Heritage Impact Assessment, October 2021 prepared by Bidwells' Heritage;
- Archaeological Desk Based Assessment, December 2021 prepared by HCUK Group;
- Landscape and Visual Position Statement, October 2021 prepared by Fabrik;
- Drawing 60830-PP-502A Mineral Extraction Constraints Plan prepared by Richard Jackson Ltd;
- Noise and Vibration Constraints Technical Note, July 2022 prepared by WSP;
- Education Review, July 2022 prepared by Educational Facilities Management Partnership Limited

1.6 These representations review the approach that Bedford Borough Council (BBC) has taken in its assessment and allocation of site Policy HOU19, and the reasonable alternatives through the site assessment process and specific new allocation assessment of the Sustainability Appraisal (SA).

1.7 In summary, these representations contend that whilst supporting the allocation of the land at Little Barford for a new settlement and its assessment under the 'new settlements' and 'A421 transport corridor with rail based growth' of the broad spatial options, the site itself should also be considered as a reasonable alternative within the component of sites 'adjacent to the urban area' through the sustainability appraisal process.

## 2 The Sustainability Appraisal

2.1 This section provides an assessment of the methodology used by BBC in carrying out the sustainability appraisal exercise.

2.2 Appendix 1 of this representation shows CODEs interpretation of the SA process followed by BBC and is used to provide a structure for these representations.

2.3 In considering the options, the SA first considered the amount of growth and then the options for distribution. In considering the options for the distribution of growth, five broad components for growth were identified and tested against the SA objectives. Subsequently various combinations of these broad



components for growth were devised to form a 'long list' of potential growth strategies before assessing detailed site alternatives.

### **3 Assessment of the Sustainability Appraisal Framework and reasonable alternatives**

#### **Sustainability appraisal objectives**

- 3.1 The sustainability objectives have been developed following a review of relevant international and national policies, plans and programmes, together with baseline information, taking account of international and EC objectives. For the prevalent themes and topics identified the subsequent review of evidence has led to the identification of key sustainability issues for which one or more objective encapsulates the key issues that have been identified.
- 3.2 Having established the key issues a Sustainability Appraisal Framework has been produced. This is the recognised way for testing social, economic and environmental effects of the local plan and alternatives. The Sustainability Appraisal Framework is found in Appendix 1, Pg.1 of the Sustainability Appraisal Report Appendices, (April 2022) (Appendix 2 of the representations)
- 3.3 CODE is broadly supportive of the approach used in identifying the sustainability appraisal objectives and the framework applied in assessing local plan policies, proposals and objectives. However, we have a noted amount of duplication across the assessment of Little Barford as a site in the New Settlement Assessment Document and as a part of the local plan policy assessment for Policy HOU19.

#### **Developing and refining options and reasonable alternatives**

- 3.4 The following section provides a more detailed comment on the process the Council has followed in developing a series of reasonable alternatives for growth and the assessment of those options. Particular focus is given to the growth strategy options and the consideration of the Little Barford site within the various options.

#### **Options for the amount of growth**

- 3.5 The Council has used the NPPF requirements for local planning authorities to assess local housing needs, informed by a local housing needs assessment that is conducted using the standard method in National Planning Practice Guidance as a starting point for considering the amount of growth the plan will deliver.
- 3.6 The local housing needs assessment shows that the local plan must provide a minimum 1,355 dwellings per year. Over the 20-year plan period the Council will therefore need to allocate land to enable a minimum of 27,100 dwellings to be delivered. However, with existing commitments of 14,824 dwellings there is a need to allocate sufficient land to deliver a further 12,276. The Council appointed Opinion



Research Services to undertake Bedford's local housing need assessment (May 2021) and was prepared following the Standard Method revised as of December 2020.

- 3.7 In considering reasonable alternative amounts of growth to be provided by the local plan the Council considers a figure lower than the 12,276 is not realistic due to NPPF requirement for plans to meet assessed needs in accordance with the standard method. This is the minimum amount of growth to be planned for and as such the Council has also assessed a higher growth figure where the local plan would need to allocate 14,986 new dwellings. This figure has been based on a 10% uplift to the local housing needs assessment. In assessing the options for the amount of growth, the higher growth option shows that there were likely to be more negative effects when assessed against the sustainability objectives. The Council concluded that the higher level of growth would exceed the identified needs and result in a number of negative effects on the sustainability appraisal objectives which would exceed any identified benefits and as such is not considered a reasonable option for growth. The Council concludes that the only reasonable option for the level of growth to be planned for is the growth option which meets the assessed housing needs for growth. We consider that the Council has sufficiently considered the reasonable alternatives for the amount of growth.

#### **Sustainability appraisal testing - Options for the distribution of growth – Broad spatial components**

- 3.8 Following the Issues and Options consultation in 2020 the Council worked to devise a strategy and define specific strategy options for consultation in relation to the location of development. Having consulted on six potential development locations in 2020, the Council drew these options together into five broad components of growth:
- Within the urban area (sites within the urban area boundary).
  - Adjoining the urban area (all or part of the site is within 0.5 miles of the urban area boundary).
  - Village related (Key Service Centres and Rural Service Centres).
  - New settlements (Wyboston, Little Barford, Twinwoods, Colworth).
  - A421 transport corridor with rail based growth (stations at Kempston Hardwick, Stewartby, Wixams and at a location between St Neots and Tempsford).
    - Transport corridor –growth focused on Kempston Hardwick, Stewartby and Wixams (rail-based growth)
    - 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).
- 3.9 The broad components have been derived following the 2020 Issues and Options consultation paper which considered six potential development locations. These were:
- Urban based
  - A421 based growth





- Rail growth
- East West Rail northern station growth
- Dispersed growth
- New settlement-based growth

3.10 The consultation document made clear that these locations would then form the building blocks for potential development options for further consultation in the draft plan and made clear that the final strategy would likely combine a number of the development locations listed above.

3.11 All of the potential spatial development options will be made up from one or several of the component locations for growth. As an initial exercise, and before the reasonable alternatives are considered, the Council assessed how each broad component of growth compared in principle when assessed against the sustainability appraisal objectives.

3.12 In reviewing the broad spatial components CODE notes that the site at Little Barford has been considered as part of two of the options, that of new settlements and as part of the A421 transport corridor with rail-based growth. CODE contends that the proposal at Little Barford could in fact be considered as part of a further broad spatial options component; adjacent to the urban area and benefit from the associated sustainability benefits. The following section goes on to discuss the implications of including the new settlement at Little Barford within this additional component.

#### **Broad spatial component - Adjacent to the urban area**

3.13 This section provides comment on the orange box within the CODE SA flow chart.

3.14 CODE would contend that the Council and the Sustainability Appraisal has failed to take into account the relationship between the site at Little Barford and the adjoining urban area of St Neots, instead only focusing on the areas adjoining Bedford.

3.15 The site at Little Barford shares its northern boundary with the RWE gas power plant and Alington Road Industrial Estate, which although located within Bedford Borough, is adjacent to the urban area of St Neots, Huntingdonshire. St Neots has been identified within the Huntingdonshire Local Plan to 2036 as one of four spatial planning areas. This designation is the highest order settlement and reflects St Neots' status as a traditional market town and as one of the most sustainable centres for development<sup>1</sup>. As such, the site at Little Barford should be considered within the 0.5 miles of the urban area boundary and considered as part of the broad spatial option for adjacent to urban area growth locations.

3.16 The relative positions of St Neots and Little Barford within the settlement hierarchy, with St Neots categorised as the equivalent of a strategic or district centre and Little Barford as a local centre: key

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<sup>1</sup> One of four 'spatial planning areas' - reflecting its status as one of the districts traditional market towns and most sustainable centres (Policy LP2: Strategy for development of the Huntingdonshire Local Plan 2036, May 2019).



service centre (policy TC1(S)) recognises that whilst the day to day needs of the residents of the new settlement of Little Barford will be provided on site, residents would travel beyond the new settlement for access to higher order facilities. The proximity of the two settlements to one another enables such journeys to be made by sustainable and active modes of travel.

3.17 Recognising that the new settlement at Little Barford should also be assessed as ‘adjacent to the urban area’ further demonstrated the site as being part of a sustainable strategy for growth when considered against the 15 sustainability objectives and should be considered as equally, if not more sustainable when assessed as part of the new settlement and A421 transport corridor with rail-based growth spatial options for development. The table below ‘Summary of broad components of growth testing’ (Pg. 45, Sustainability Appraisal Report Appendices, April 2022) shows that the option for growth adjacent to urban areas scores much more positively when considering sustainability objectives 3 - Reduce emissions of carbon dioxide and improve energy efficiency, 6 - Promote vital and viable town centres and 15 - Reduce the need to travel and promote sustainable modes of transport.

Sustainability appraisal objective	Broad component of growth				
	Within the urban area	Adjoining the urban area	Village related	New settlements	A421 transport corridor with rail based growth
1. Improve air quality.	X	X	X	X	X
2. Protect, maintain and enhance biodiversity and habitats.	?	X	X	X	X
3. Reduce emissions of carbon dioxide and improve energy efficiency.	++	++	XX	XX	+
4. Conserve, sustain and enhance the historic environment.	?	?	?	?	?
5. Promote strong, sustained and balanced economic growth, stimulating job creation across a range of sectors.	?	+	X	X	+
6. Promote vital and viable town centres.	++	++	XX	XX	XX
7. Encourage and support physical activity.	+	+	X	?	?
8. Protect and enhance landscape and townscape character and the sense of place in settlements.	?	?	X	X	X
9. Maximise development on previously developed land and avoid the loss of high quality agricultural land.	++	X	X	X	+
10. Protect the quantity and quality of water resources.	+	+	X	+	+
11. Minimise flood risk.	0	0	0	0	0
12. Promote good quality housing, ensuring an appropriate mix of house types and sizes.	+	+	+	+	+
13. Provide for residents' needs and improve access to community services and facilities.	+	+	?	?	?
14. Promote social cohesion, the prevention of crime and reduce the fear of crime.	?	?	?	?	?
15. Reduce the need to travel and promote sustainable modes of transport.	++	++	XX	X	+



- 3.18 The sustainability appraisal testing shows that development adjacent to the urban area should be assessed as a major positive when considered against the sustainability objective to reduce emissions of carbon dioxide and improve energy efficiency. Concentrating development around existing urban areas is likely to reduce the need to travel and the length of trips undertaken by private cars and commercial vehicles which are a major source of emissions. In locating development close to major destinations, in this case St Neots and the services and facilities available within, the likelihood of travel by walking and cycling for residents and employees is increased. Concentrated development also increases the viability of public transport which can further reduce emission levels as an alternative to private vehicles.
- 3.19 Similarly locating development adjacent to the urban area also provides major positives in reducing the need to travel and the promotion of sustainable modes of transport. Once again, the need to travel should be reduced due to the proximity of services and facilities and the location would benefit from an enhanced public transport service providing real alternatives to the private vehicle.
- 3.20 The Council's own evidence base in relation to transport have modelled the provision of a high frequency bus route between St Neots and Sandy, stopping at the new settlement at Little Barford, further demonstrating the benefits associated with the new settlement proximity to an urban area location with regards to sustainability objectives 3 and 15.
- 3.21 Further to the high frequency bus service the new settlement will also provide a range of alternative sustainable transport links both within the settlement and to the neighbouring urban area of St Neots which includes an existing station on the East Coast Main Line. [Paragraph 6.1.2, pg. 24, Transport Technical Note, WSP, July 2022]
- 3.22 In light of the above, CODE contends that the Little Barford new settlement does indeed fit within the parameters of adjacent to urban area spatial growth option and can demonstrate significant positives associated with the sustainability objectives 3 and 15. When compared with those assessments for new settlements and A421 transport corridor growth there is clear differences demonstrating ++ assessments against these two sustainability objectives. The rightful inclusion of Little Barford within this board spatial growth option further demonstrates the site's sustainability and supports the allocation for a new settlement.
- 3.23 The further benefit associated with adjacent to urban area development is associated with the locations ability to promote vital and viable town centres. In identifying the issues around employment, business, retail and tourism which have shaped the sustainability objective 3 the Council has identified the key issue of promoting the vitality of Bedford and Kempston town centres (Paragraph 3.71, pg. 44, Sustainability Appraisal Report, April 2022). Whilst CODE acknowledges the Little Barford site location is unlikely to benefit those town centres in Bedford and Kempston the site's location on the edge of St Neots cannot be overlooked.



- 3.24 St Neots will provide future residents of the new settlement with access to high order facilities such as cinemas, and other entertainment and leisure, and a wider range of employment that will not be provided by the new settlement. Policy HOU19 details how the new settlement will provide *'all the key services and facilities to address its own needs, including health, education, retail, culture and community components.'* The need to establish and sustain these key services and facilities to address the day to day needs of residents of the new community at Little Barford is supported by the landowners. The Transport Technical Note (July 2022) submitted in support of these representations explains the proposals commitment to self-sufficiency through inter alia the delivery of on-site social infrastructure including education, health, retail, sport and leisure and other community facilities supported by digital communications infrastructure assisting in minimising the need to travel externally from the site. However, the sites proximity to the urban area of St Neots is a positive factor, the principle of which is recognised in the other sections of the SA. High frequency bus service and new active travel would connect with existing routes and the National Cycle Network will ensure there are a greater percentage of journeys beyond the site can be undertaken by sustainable modes of transport than a site that is not adjacent to an urban area. This should be reflected in the SA in the assessment of Little Barford. It demonstrates that although the proximity to EWR is a significant advantage over other locations in the choice for Little Barford as the location for a new settlement. However, even in the absence of EWR, Little Barford's location in the borough and its relationship to other urban areas makes is a sustainable choice.
- 3.25 It would assist the BBLP2040 objective for Little Barford to cater to the day to day needs of its residents if Policy HOU19 and TC1(S) identified the new settlement as a local centre: Key service centre. Currently the Council has failed to designate the new settlement within the hierarchy of town centres as set out in Policy TC1(S). CODE therefore contends that in order to deliver the required town centre facilities as set out in Policy HOU19 the new settlement at Little Barford should be included within the town centre hierarchy as a 'Key Service Centre'. This would follow a similar approach to Wixams new settlement which *'is identified as a potential key service centre, as over the course of the plan period, the planned town centre will be constructed and, once complete, will serve the settlement'* (Paragraph 5.7, pg. 85, Local Plan for Submission, BBC, April 2022)
- 3.26 Doing so would allow for the provision of town centre uses within the new settlement and, whilst not promoting the vitality or viability of Bedford or Kempston town centres will allow for the creation of new suitably sized key service centre, within Bedford Borough as an integral part of the new settlement at Little Barford. The table produced under paragraph 2.5 of the Town Centre and Shopping Polices Topic Paper (April 2022) indicates that key service centres will serve a primarily local catchment but also the surrounding rural area through the provision of a range of shops of a local nature that could include a small supermarket, newsagent and pharmacy type facilities. In making provision within allocation Policy HOU19 for a defined 'town centre' area, BBC will remove the need to apply a sequential test for main



town centre uses within the defined area. This would be one element to encourage take up and assist in establishing, in early phases of the development, services and facilities for the community to use and the associated sustainable travel patterns.

- 3.27 This demonstrates an overlap between the objectives set out within the SA where although the new settlement at Lille Barford may not support vitality and viability within Bedford and Kempston but benefits from enhanced the proximity to an out of district town centre with regards to objectives 3 and 15 and the desire to reduce emissions of carbon dioxide and promote sustainable modes of transport.

### **Development strategy options**

- 3.28 Having established the broad components for growth BBC further refined its options for growth. Using the broad components for growth in different combinations produced 16 alternative strategies for development. In developing these strategies BBC considered that all but two had the potential to meet the housing and employment figures of the plan and have therefore been considered reasonable alternatives.
- 3.29 These options are set out in the Development Strategy Topic Paper (Paragraph 3.13 – 3.14, pg. 8 – 21, May 2022)
- 3.30 Each of the 14 options have then been assessed against the 15 sustainability objectives. It is highlighted by the Council that in some instances no difference can be distinguished between the options, as the assessment at this stage is being undertaken at a strategic level and a number of the SA objectives require more detail associated with specific site circumstances. This means that a meaningful assessment of objectives relating to biodiversity, historic environment and promoting social cohesion / preventing crime is not possible. BBC explains that ‘as a result, certain sustainability objectives have been assessed as more significant in assessing the strategy alternatives’ (Paragraph 8.8, pg. 93, Sustainability Appraisal Report, April 2022).
- 3.31 Having assessed the reasonable alternatives for the distribution of growth the Council has identified Option 2bi as its preferred option for growth distribution. This shares housing growth between Stewartby / Kempston Hardwick and Wixams which has benefits for delivery, whilst maintaining a sufficient level of growth to enable housing needs to be met and to support major strategic green infrastructure projects (Paragraph 9.7, pg. 102, Sustainability Appraisal Report, BBC, April 2022). Additional to the growth at Stewartby / Kempston Hardwick and Wixams this option also includes the provision of one new settlement at either Wyboston or Little Barford.

## **4 Distribution of growth – detailed site alternatives**

- 4.1 Having established a preferred strategy for the location of development the SA then moves on to provide detailed site assessments of all the proposed sites to fit within the preferred strategy. This



helps inform the process of selecting sites for inclusion within the local plan by identifying whether a site is likely to produce positive, negative or uncertain effects in relation to the SA objectives with the exception of new settlements which are assessed separately within the New Settlements Assessment Topic Paper (April 2022)

### **New settlements assessments**

- 4.2 This section provides comment on the yellow box within the CODE SA flow chart.
- 4.3 Proposals for four new settlements have been put forward in the new local plan. The Council has made the decision that the new settlements should be assessed for allocation using a bespoke criteria specifically designed for large, standalone developments. Details of this are set out in section 3 of the New Settlement Assessment Document (Paragraph 3.1, pg. 4, April 2022). This includes a range of Council identified criteria along with an assessment of each new settlement against the 15 sustainability objectives.
- 4.4 In assessing the site at Little Barford the Council has failed to consider the points raised earlier in the representations that not only does the proposal fit within the broad spatial components of 'new settlements' and 'A421 travel corridor growth', but also as 'development adjacent to an urban area'. Failing to recognise the location on the edge of an urban area has resulted in what CODE considers an inaccurate assessment of the site against some of the sustainability appraisal objectives where most positive scores would be wholly justified. Once again these relate to issues around the reduction of emissions of carbon dioxide and the promotion of sustainable transport methods.
- 4.5 The testing goes on to show that the negative effects of the assessment against the SA objectives are less severe for Little Barford and Wyboston in relation to air quality, carbon dioxide and travel objectives than for Colworth and Twinwoods. Paragraph 8.26 of the Sustainability Appraisal Report (April 2022) indicates that these benefits are derivative of both Little Barford and Wyboston's location in relation to new stations proposed as part of the East West Rail infrastructure project. Once again CODE contends that were proper consideration given to the site's location adjacent to an urban area (one which includes a railway station on the East Coast Mainline), these negative effects should in fact be considered positive effects. The development of Little Barford not only creates a new settlement but is in a location that facilitates journeys by sustainable and active modes of travel to higher order facilities whilst also reducing the distance to be travelled. Locating development close to the major destinations or high-level facilities within the neighbouring St Neots also increases the likelihood of travelling by walking and cycling for residents and employees.
- 4.6 In explaining their preference for the land at Little Barford paragraph 9.10 of the Sustainability Appraisal Report states '*The Council prefers Little Barford because it is more conveniently located to the planned East West Rail interchange and avoids the loss of high quality agricultural land.*'



4.7 CODE believes that the justification for the selection of Little Barford should also recognise its unique geographical location positioned close to and well connected by sustainable and active modes of transport to another settlement further up the settlement hierarchy in St Neots which includes a railway station on the East Coast Mainline. The settlement hierarchy with St Neots in a higher tier of settlement than Little Barford, protects St Neots from competition from Little Barford whilst recognising that there will be a relationship between the two. The above representations further strengthen the allocation of the land and Little Barford by demonstrating that enhanced levels of sustainability should be considered when assessing the site as part of the broad spatial options considered by the Council. Had the Council assessed the site as an edge of urban area site positive effects would have been identified when assessed against sustainability objectives 3 and 15. In assessing the site in such a way it has become clear that, although the Council has stated Little Barford is the preferred option as a result of its location in relation to East West Rails proposals, the delivery of East West Rail is not fundamental to the delivery of a self-sustaining settlement at Little Barford. Internal links within the settlement to proposed town centre uses and external links to higher order services and facilities within St Neots, which supplement and complement the range of facilities to be provided within the development, serve to demonstrate the sustainability of the location and support the sites allocation.

4.8 In addition to changes in the assessment of the Little Barford new settlements sustainability scores for objectives 3 and 15, CODE also considers there to be additional SA objectives where the proposals have not been properly considered.

#### **Biodiversity and green infrastructure – Protect, maintain and enhance biodiversity and habitats**

4.9 As part of the New Settlements assessment the site at Little Barford has been assessed as having an 'uncertain' impact with regards to SA objective 2 (Pg. 32, New Settlements Assessment Topic Paper, April 2022). As part of the Regulation 18 consultation representations and a suite of evidence was submitted in support of the site at Little Barford, evidence which CODE feels demonstrates clear positives when considered against the assessment criteria.

4.10 A County Wildlife Site (CWS) is located on land within the Alington Estate. The CWS designation covers the field between Lower Farm Barns and St Deny's Church, the adjacent grazed field to the south of the access track to the Church and an area of wetlands/wet woodlands adjacent to the River Great Ouse. Although no development is proposed on the CWS, it is included within the land proposed for a new settlement allocation so that an appropriate programme of management can be implemented which may over time enhance the grassland habitats (refer to Botany Assessment of Grassland Component of Little Barford CWS, September 2021).



Extended phase one habitat surveys have been undertaken in respect of land within the Alington Estate, west and east of the ECM (refer to Preliminary Ecological Appraisals, September 2021 and July 2022 (PEAs)).

- 4.11 The PEAs establish that the site supports a range of protected species the likely impacts, mitigations and enhancement measures have been considered. The PEA concludes that with suitable measures there will be no negative residual effects associated with the development. Further details can be seen in table 8 of the PEA.
- 4.12 PEAs have been undertaken for the site and established that, “Through incorporation of further surveys, mitigation, and precautionary methods, it is considered that the site could deliver a significant biodiversity net gain in terms of measures to support high value habitats and protected species and to carry this out in line with current wildlife legislation, chapter 15 of the NPPF (MHCLG, 2021); and local planning policies relevant to ecology.” (Paragraph 5.2, pg.26, PEA, SES, September 2021). The proposed development provides an opportunity to deliver landscape scale biodiversity benefits that enhance habitats within and adjacent to the River Great Ouse floodplain and strengthen the ecological connectivity for priority habitats and protected and notable species. Furthermore, the relevant documents (as set out in paragraph 1.5) are submitted in support of these representations so they can continue to be considered as part of the local plan preparation process.
- 4.13 The most western area of the site is within the Lower Great Ouse River Valley green infrastructure opportunity zone under Policy AD24 of the Bedford Borough Allocations and Designations Local Plan, July 2013. Paragraph 6.3 of the Transport Technical Note (July 2022) explains of the feasibility and deliverability of a multi-user route along the River Great Ouse will be considered as an option to accommodate pedestrians and cyclists travelling through the site. This again supports the SA objective and evidence has been prepared to demonstrate positive effects of the proposal in relation to its delivery.
- 4.14 Having regard to the above CODE therefore contends that the proposal site at Little Barford should be assessed as at least having minor positive impacts in the delivery of SA objective 2.

#### **Appraisal findings – the preferred approach**

- 4.15 Having assessed the reasonable alternatives for the distribution of growth the Council has identified Option 2bi as its preferred option for growth distribution and includes a new settlement at either Wyboston or Little Barford. The Council has chosen this despite option 2a being the best performing option for the distribution of growth when considered against the sustainability objectives. Paragraph 9.5 of the Sustainability Appraisal Report (April 2022) explains that the decision has been made *‘because of its [Option a’s] extremely high concentration of growth on one location at Stewartby /*





*Kempston Hardwick, which presents challenges of delivery and increased risks to the plan's delivery as a whole.'*

- 4.16 Paragraph 10.1 of the Sustainability Appraisal Report (April 2022) explains the main focuses of the preferred option and includes reference to 'a new settlement and related employment provision at Little Barford well connected to the new East West Rail interchange with the East Coast Main Line.'
- 4.17 In assessing the new settlement proposals against the sustainability objectives (part of the New Settlements Assessment criteria) both Little Barford and Wyboston perform better than the Twinwoods and Colworth. The Council considers both Little Barford and Wyboston to be consistent with the Councils' preferred broad spatial option for growth which concentrates growth within the A421 transport corridor with rail-based growth.
- 4.18 The sustainability appraisal testing has shown that each site can deliver positive effects, particularly in relation to the following sustainability appraisal objectives:
- Promote strong, sustained and balanced economic growth, stimulating job creation across a range of sectors.
  - Encourage and support physical activity.
  - Protect the quantity and quality of water resources.
  - Promote good quality housing, ensuring an appropriate mix of house types and sizes.
  - Provide for residents' needs and improve access to community services and facilities.
  - Promote social cohesion, the prevention of crime and reduce the fear of crime.
- 4.19 The Council explains that in choosing between Little Barford and Wyboston the preferred option is Little Barford because it is more conveniently located to the planned East West Rail interchange and avoids the loss of high-quality agricultural land.
- 4.20 This fits in with the Council's preferred strategy for growth locations within the A421 transport corridor and with potential rail-based growth. However, these representations have demonstrated that the site at Little Barford should not be considered solely as a location for rail-based growth in respect of reliance upon EWR. The location on the edge of St Neots has considerable sustainability benefits which have not been fully assessed by the Council but are raised within this representation. Assessing the site in this manner clearly shows additional positives when assessed against the SA objectives and would further strengthen the allocation.
- 4.21 Having established the preferred option, this is then tested against the sustainability appraisal objectives with the results shown in paragraph 10.3 of the Sustainability Appraisal Report (April 2022). This is a broad assessment of the preferred option as a whole and is then followed by an assessment against the SA objectives of the draft local plan for submission to the Planning Inspectorate for examination on a policy-by-policy basis.



### **Sustainability appraisal testing – Local Plan Polices - Policy Hou19 Little Barford new settlement**

- 4.22 This section provides comment on the green box within the CODE SA flow chart
- 4.23 The SA appraises each of the polices that are included in the draft plan for submission. The policies are evaluated against the Sustainability Appraisal Framework (Appendix 1, Pg.1 of the Sustainability Appraisal Report Appendices, April 2022). Each policy is assessed to determine whether it supports or conflicts with each sustainability objective, the size of impact and how this may change over time. The assessment of the sites that are development allocations in the local plan is based on the detailed site assessment questions of the Sustainability Appraisal Framework. The assessment in full is set out in Appendix 11 of the Sustainability Appraisal Report, where new settlements are assessed in the separate New Settlement Assessment Topic Paper.
- 4.24 There appears to be some conflict or confusion around the exact methodology of assessment for the new settlements and the criteria they have been assessed against. Accounting for the above the Council has previously explained that the assessment of the four new settlement proposals is undertaken using bespoke criteria specifically designed for large, standalone developments as explained and set out in the New Settlements Assessment Topic Paper (April 2022).
- 4.25 We agree with the overall conclusions and outcomes, but CODE has identified inconsistencies across the assessment of SA objectives 3, 6, 7, 13 and 15 where some of the objectives seem to recognise the benefits associated with the site's location on the edge of St Neots whilst the assessment of other objectives fails to do so. Objectives 3 and 15 have, as above been highlighted, as objectives improperly assessed. Corrections to the inconsistencies we raise in the assessment would only reinforce the result that Little Barford is a sustainable location for new settlement growth.

### **SA objective 3. Reduce emissions of carbon dioxide and improve energy efficiency**

- 4.26 The Council has commented that as a 'self-contained' new settlement it is expected that the settlement be largely self-supporting in terms of amenities and services and therefore reduces the needs for residents to travel outside of the settlement. Where travel, out from the settlement is required walking and cycling provision, together with the high frequency bus service between St Neots and Sandy means there is the potential to minimise car use. As explained in the table on page 36 of the Sustainability Appraisal Appendix '*Ensuring that major destinations are close together means that there is a greater likelihood of travel by walking and cycling for residents and employees. Concentrated development also increases the viability of public transport, which is a lower producer of carbon dioxide per head than private car travel.*' And should be considered a major positive when assessed against the SA objective. This is before considering the additional sustainability benefits and public transport options that could be further provided by the East West Rail line.



**SA objective 15. Reduce the need to travel and promote sustainable modes of transport.**

- 4.27 The assessment of policy HOU19 against SA objective 15 has resulted in the scoring of minor negative effects across the short, medium and long term. The comments provided by the Council explains that a self-contained new settlement would be expected to be largely self-supporting in terms of amenities and services thus reducing the need for residents to travel outside of the settlement. Walking and cycling provision, together with improved bus links to St Neots and proximity to a planned East West Rail station mean that car use is likely to be minimised. However, there are still likely to be trips by car for employment and services that cannot be met within the settlement and are not easily accessible by public transport.
- 4.28 CODE would refute the final sentence of the Council's assessment and highlight the assessment SA objective 15 when considered against the edge of urban area growth spatial option. Scoring a major positive it is recognised that *'Concentrating development is likely to reduce the need to travel and length of travel by private car and commercial vehicles. Ensuring that major destinations are close together means that there is a greater likelihood of travel by walking and cycling by residents and employees. Concentrated development also increases the viability of public transport.'* (Sustainability appraisal testing, broad components of growth, Adjacent to urban area table, pg. 35 - 38, Sustainability Appraisal Report Appendices, April 2022)
- 4.29 The location of Little Barford adjacent to St Neots will provide future residents of the new settlement with access to high order services and facilities that may not be provided by the new settlement itself. Access to these facilities will be promoted through a range of sustainable modes including walking and cycling [Transport report, WSP, July 2022] or public transport facilities (high frequency bus service between St Neots and Sandy) [Transport report, WSP, July 2022].
- 4.30 East West Rail would provide an additional benefit by providing a sustainable alternative to the car for those long-distance journeys. However, given the proximity of St Neots and the high order facilities that are on offer there it is considered that a majority of the needs of future residents of the new settlement at Little Barford could be met whether by the settlement itself or St Neots train station.

**5 Conclusions**

- 5.1 CODE Development Planners considers that the BBLP 2040 is broadly in accordance with the legal requirements and meets the tests of soundness have been met.
- 5.2 Despite this CODE has some concerns over the assessment of the site at Little Barford and the application of assessments of broad spatial components in assessing the sustainability of the site. In recognising the site's location on the edge of St Neots the Council would identify additional positive effects against sustainability objectives 3 and 15 of both the site assessment and assessment of Policy



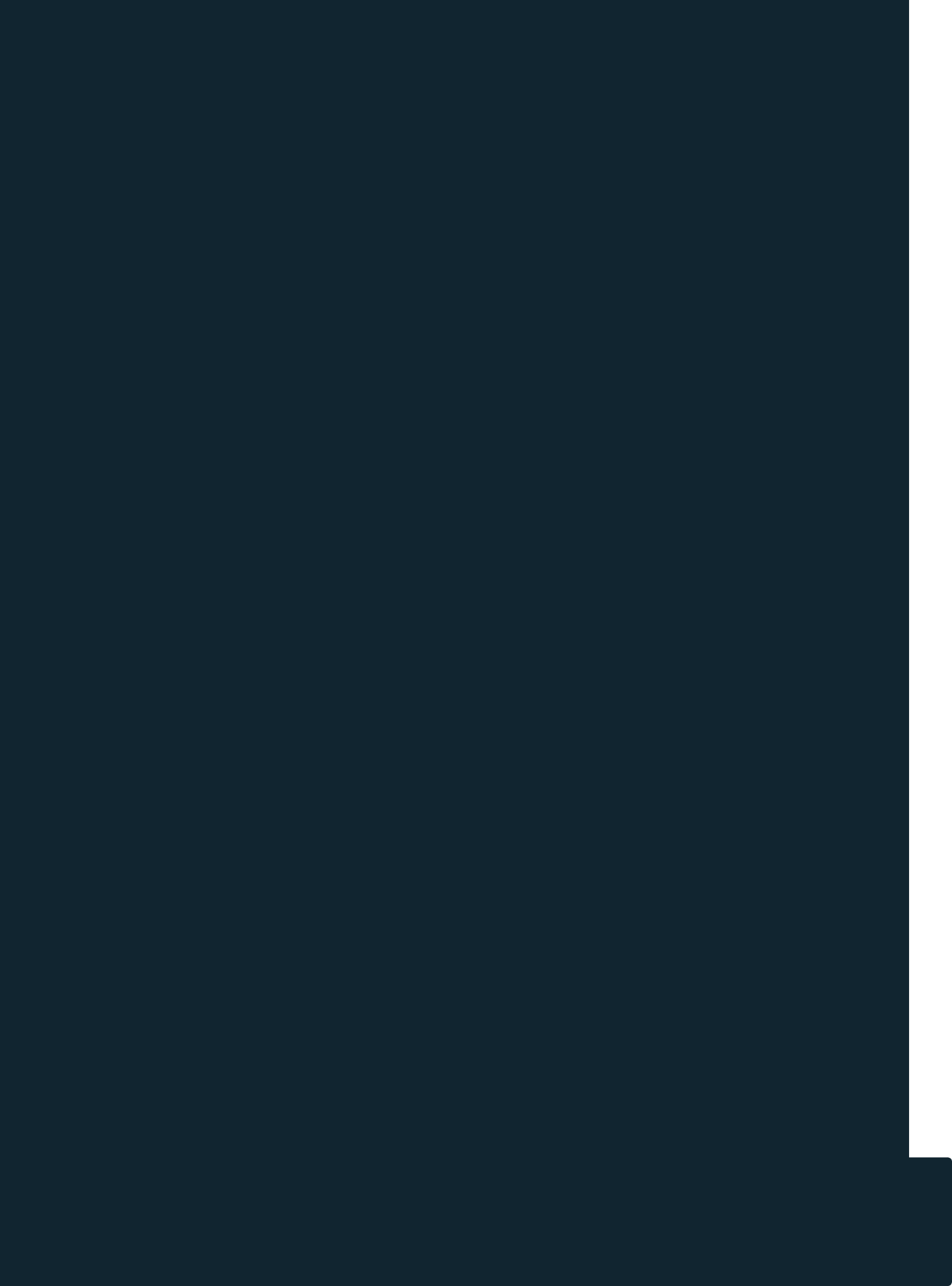
HOU19. Assessing the site with proper consideration of the location on the edge of St Neots provides further justification for the allocation, additional to the Councils reasoning for allocating. The Council have stated that Little Barford is the preferred option for a new settlement because of its convenient location in relation to the planned East West Rail interchange and because the site avoids the loss of high-quality agricultural land. The above representations have demonstrated that whilst the site does benefit from the East West Rail the selection of Little Barford new settlement is justified even in the absence of East West Rail. Where there is a need to leave the new settlement the location adjacent to St Neots and planned pedestrian, cycle and public transport enhancements provide highly sustainable means of access.



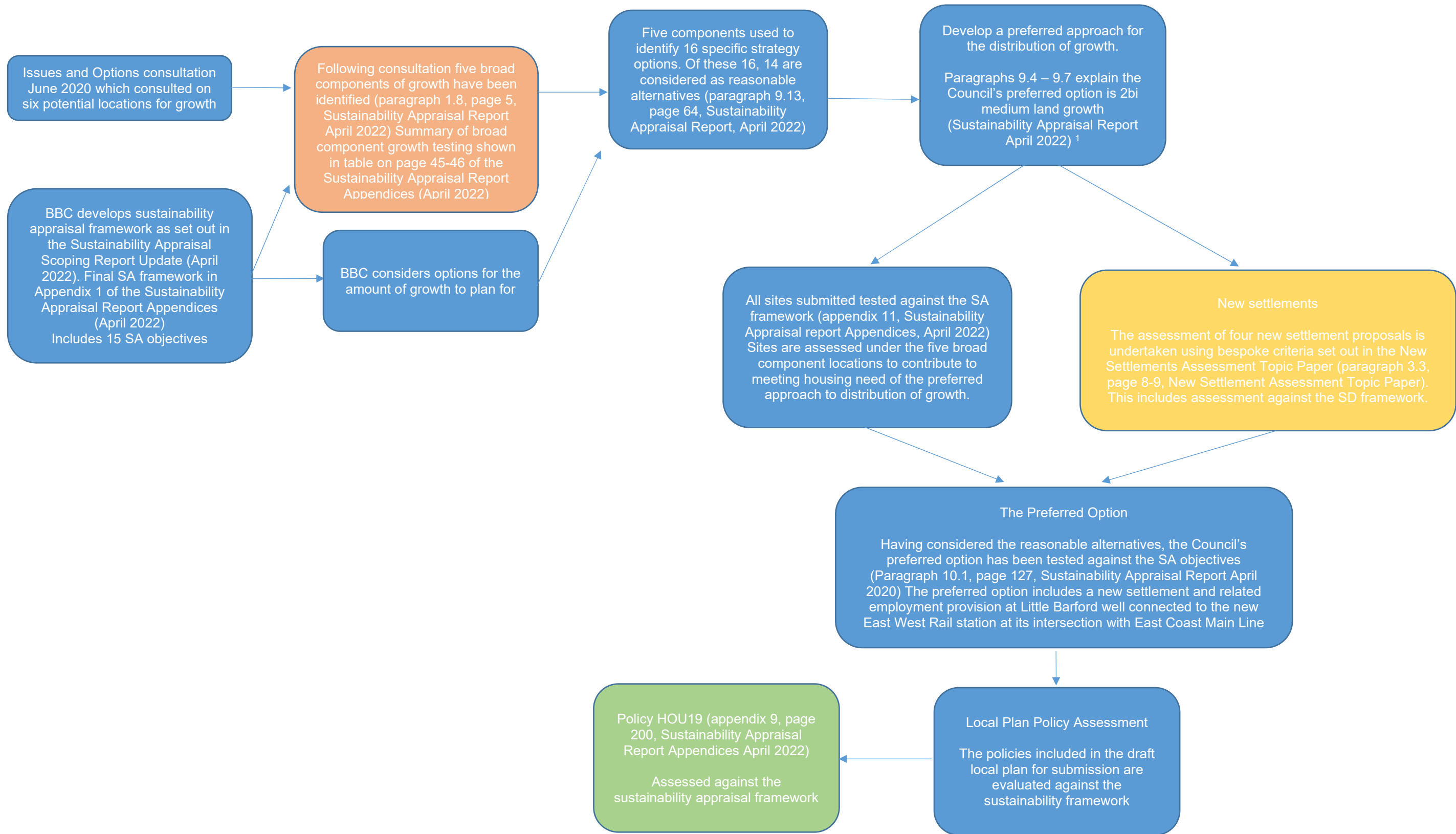
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## Appendix 1

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**Appendix 1 - CODE interpretation of Sustainability Appraisal process**



<sup>1</sup> Note option 2a performed best against SA objectives but is not the preferred option. This is due to the extremely high concentration of growth in one location. 2bi is preferred as it maintains a sufficient level of growth to enable housing needs to be met and support major strategic green infrastructure (paragraph 9.4 – 9.9 Sustainability Appraisal Report April 2022)



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## Appendix 2

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# **Local Plan 2040**

Have Your Say on the Future of Your Borough

## **SUSTAINABILITY APPRAISAL REPORT APPENDICES**

**April 2022**

## Sustainability appraisal framework

Sustainability appraisal objectives	Assessment questions	
	Strategy / policy Will the option / policy help to:	Sites Is the site:
<b>Air quality</b>		
1. Improve air quality.	<ul style="list-style-type: none"> <li>• Reduce the need to travel?</li> <li>• Encourage more sustainable transport?</li> <li>• Locate and design development so that current and future residents will not regularly be exposed to poor air quality?</li> </ul>	<ul style="list-style-type: none"> <li>• Within or adjoining the urban area, a defined settlement policy area or the built form of a small settlement?</li> <li>• Accessible on foot to a food store?</li> <li>• Accessible on foot to a primary school?</li> <li>• Accessible on foot or by bus to a major employer?</li> <li>• Outside, adjoining or within the air quality management area?</li> </ul>
<b>Biodiversity and green infrastructure</b>		
2. Protect, maintain and enhance biodiversity and habitats.	<ul style="list-style-type: none"> <li>• Protect, restore, create or enhance habitats?</li> <li>• Achieve a net gain in biodiversity?</li> <li>• Support enhancements to multi-functional green infrastructure networks?</li> </ul>	<ul style="list-style-type: none"> <li>• Within or adjoining a site of nature conservation importance / within the impact risk zone of an SSSI / national site network site?</li> <li>• In an area where protected species are known or likely to exist?</li> </ul>

Sustainability appraisal objectives	Assessment questions	
	Strategy / policy Will the option / policy help to:	Sites Is the site:
		<ul style="list-style-type: none"> <li>• Potentially able to achieve a net gain in biodiversity?</li> <li>• Able to link into the green infrastructure opportunity network?</li> <li>• Likely to impact on an area currently providing ecosystem services?</li> </ul>
<b>Climate change and energy</b>		
3. Reduce emissions of carbon dioxide and improve energy efficiency.	<ul style="list-style-type: none"> <li>• Increase energy efficiency in the construction of buildings?</li> <li>• Encourage the generation of renewable energy?</li> <li>• Reduce the need to travel?</li> <li>• Improve and encourage public transport, cycling and walking?</li> </ul>	<ul style="list-style-type: none"> <li>• Proposing a renewable energy scheme or extra energy efficiency standards?</li> <li>• Within or adjoining the urban area, a defined settlement policy area or the built form of a small settlement?</li> <li>• Accessible on foot to a food store?</li> <li>• Accessible on foot to a primary school?</li> <li>• Accessible on foot or by bus to a major employer?</li> </ul>
<b>Cultural heritage and historic environment</b>		
4. Conserve, sustain and enhance the historic environment.	<ul style="list-style-type: none"> <li>• Protect and not adversely impact the borough's historic environment?</li> </ul>	<ul style="list-style-type: none"> <li>• Likely to impact on designated or non-designated heritage assets or their settings?</li> </ul>
<b>Employment, business, retail and tourism</b>		

Sustainability appraisal objectives	Assessment questions	
	Strategy / policy Will the option / policy help to:	Sites Is the site:
5. Promote strong, sustained and balanced economic growth, stimulating job creation across a range of sectors.	<ul style="list-style-type: none"> <li>• Provide more employment opportunities?</li> <li>• Encourage business growth?</li> </ul>	<ul style="list-style-type: none"> <li>• Likely to increase future economic and employment opportunities?</li> </ul>
6. Promote vital and viable town centres.	<ul style="list-style-type: none"> <li>• Support the vitality and viability of established town centres?</li> </ul>	<ul style="list-style-type: none"> <li>• Proposing a main town centre use in, on the edge or outside of a town centre?</li> </ul>
<b>Health and wellbeing</b>		
7. Encourage and support physical activity.	<ul style="list-style-type: none"> <li>• Direct development to areas which are either well served by open space or have the capacity for providing more open space?</li> <li>• Promote the provision of sports and recreation facilities?</li> </ul>	<ul style="list-style-type: none"> <li>• Within 400m of an existing open space or proposing open space within it?</li> <li>• Within 800m of a sports facility or proposing a sports facility within it?</li> </ul>
<b>Landscape and townscape</b>		
8. Protect and enhance landscape and townscape character and the sense of place in settlements.	<ul style="list-style-type: none"> <li>• Promote development that recognises and responds to the landscape?</li> <li>• Promote development that recognises and responds to the existing townscape?</li> </ul>	<ul style="list-style-type: none"> <li>• Likely to have a significant adverse impact on the surrounding landscape?</li> <li>• Within the existing settlement form?</li> </ul>
<b>Land, soil and water</b>		

Sustainability appraisal objectives	Assessment questions	
	Strategy / policy Will the option / policy help to:	Sites Is the site:
9. Maximise development on previously developed land and avoid the loss of high quality agricultural land.	<ul style="list-style-type: none"> <li>• Enable the use of land that has previously been developed in preference to land that has not been developed?</li> <li>• Promote development on lower grade agricultural or non-agricultural land in preference to higher grades?</li> </ul>	<ul style="list-style-type: none"> <li>• On previously developed land?</li> <li>• On best and most versatile agricultural land ie grades, 1, 2 or 3a?</li> </ul>
10. Protect the quantity and quality of water resources.	<ul style="list-style-type: none"> <li>• Protect surface water and groundwater resources?</li> <li>• Support improvements to water quality?</li> </ul>	<ul style="list-style-type: none"> <li>• Within a groundwater source protection zone?</li> </ul>
11. Minimise flood risk.	<ul style="list-style-type: none"> <li>• Avoid development in areas at risk of flooding both now and in the future?</li> </ul>	<ul style="list-style-type: none"> <li>• At risk of flooding?</li> </ul>
<b>Population, housing and community</b>		
12. Promote good quality housing, ensuring an appropriate mix of house types and sizes.	<ul style="list-style-type: none"> <li>• Provide a range of house types and sizes, including affordable housing?</li> <li>• Meet the needs of all sectors of the community?</li> </ul>	<ul style="list-style-type: none"> <li>• Likely to provide a mix of housing, including affordable housing?</li> <li>• Able to address a particular housing need?</li> </ul>
13. Provide for residents' needs and improve access to	<ul style="list-style-type: none"> <li>• Promote the development of a range of accessible community facilities?</li> </ul>	<ul style="list-style-type: none"> <li>• Within 800m of a facility where cultural or social activities can be accessed?</li> </ul>

Sustainability appraisal objectives	Assessment questions	
	Strategy / policy Will the option / policy help to:	Sites Is the site:
community services and facilities.		
14. Promote social cohesion, the prevention of crime and reduce the fear of crime.	<ul style="list-style-type: none"> <li>• Encourage social cohesion and active involvement in community activities?</li> <li>• Promote a reduction in levels of crime or the fear of crime?</li> </ul>	<ul style="list-style-type: none"> <li>• Likely to encourage social cohesion?</li> <li>• Likely to help make the area safer?</li> </ul>
<b>Transport</b>		
15. Reduce the need to travel and promote sustainable modes of transport.	<ul style="list-style-type: none"> <li>• Reduce the need to travel?</li> <li>• Support the use of sustainable modes of transport (walking, cycling, and public transport)?</li> </ul>	<ul style="list-style-type: none"> <li>• Within or adjoining the urban area, a defined settlement policy area or the built form of a small settlement?</li> <li>• Accessible on foot to a food store?</li> <li>• Accessible on foot to a primary school?</li> <li>• Accessible on foot or by bus to a major employer?</li> <li>• Able to connect with the highway without constraint?</li> <li>• Able to be developed without causing highway or junction capacity issues?</li> </ul>