

Bedford Borough Local Plan 2040

Response by AWG to Pre-Submission Local Plan Consultation
July 2022



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Contents

1.0	Introduction	3
2.0	Spatial Strategy and Distribution of Growth (Policy DS2(S) & DS5(S))	4
	Plan Period	8
3.0	Climate Change	9
4.0	South of Bedford (Policy HOU12) and Kempston Hardwick New Settlement (Policy HOU14)	11
5.0	Summary and Conclusions	15
	Appendix 1: Site Location Plan	16

1.0 Introduction

- 1.1 These representations have been prepared on behalf of Arnold White Group ('AWG') in response to the public consultation on Bedford Borough Council's ('BBC') Local Plan 2040 Plan for Submission April 2022 Consultation ('the Local Plan').
- 1.2 AWG are a landowner and strategic land promoter, owning and controlling significant areas of land within Bedford Borough. AWG are owners of 96ha of land at Broadmead, Marston Vale, north of Stewartby and c.12ha area of land known as Elms Farm, Kempston Hardwick. A significant part of the site has been optioned to Cloud Wing under an agreement that expires in December 2023. This response has been prepared and submitted on behalf of AWG in respect of both areas of land, as landowner.
- 1.3 The Broadmead land is part of the wider 222ha 'Bedford Business Park' being promoted by Cloud Wing UK Ltd ('Cloud Wing') and a separate set of representations have been submitted by Cloud Wing, with AWG approval, in respect of that land. Reference is made to those representations throughout this document.
- 1.4 A Site Location Plan identifying the Elms Farm site (hereafter referred to as 'the Site') is enclosed at Appendix 1.
- 1.5 AWG has been active participants in every stage of the Local Plan 2030, as well as the previous stages of consultation on the Local Plan 2040.
- 1.6 AWG support the proposed allocation HOU14. However, for the reasons set out in these representations, AWG consider that the Local Plan as drafted is not sound as the approach taken to this allocation is not an appropriate strategy having regard to available land, nor is it consistent with national policy as it does not fully enable the delivery of sustainable development. The Local Plan can be made sound through the following modifications:
- An assessment of land at and surrounding HOU14 based on recognisable boundaries (i.e. roads), rather than an arbitrary line drawn in the middle of a field;
 - The resulting inclusion of the Elms Farm Site as land allocated for residential development as part of the wider HOU14 allocation;
 - Strengthening of the Plan regarding climate change, with a Policy that promotes the development of renewable energy, in particular wind and solar, to help tackle the climate emergency and energy security.
- 1.7 This response also includes further information in relation to the Elms Farm site, providing justification as to why it should be allocated within HOU14 in accordance with national policy in order to make the Local Plan sound.

2.0 Spatial Strategy and Distribution of Growth (Policy DS2(S) & DS5(S))

- 2.1 AWG supports the principle of significant growth being directed to the south of Bedford along the A421 Corridor and at its land at Kempston Hardwick. The area is well-located for access to the strategic highway network, including the junction of the A421 with the A428, approximately 2.5 miles south of Bedford town centre. The A421 is the main thoroughfare connecting Bedford with the M1 and A1 and is the route where significant investment is proposed. The area benefits from existing rail links, with the Kempston Hardwick railway station located centrally in the parties' site on the Bedford to Bletchley line providing services into Bedford Town Centre, Bletchley, and Milton Keynes roughly every 30 minutes in each direction. There are also regular bus services on the B530 and in Stewartby to the south which provide public transport links into Bedford and nearby settlements. The area's connectivity is set to improve further as a result of the proposed improvements to the East West rail line which would connect the communities between Oxford, Milton Keynes, Bedford, and Cambridge. These national investments in infrastructure improvements are part of the wider growth strategy for the Oxford-Cambridge Arc aimed at unlocking the full economic potential of the region.
- 2.2 On this basis, the area to the south of Bedford, around Kempston Hardwick, has huge potential and is very clearly the right location for new development of significant scale.
- 2.3 As set out in detail in the representations by Cloud Wing, AWG's' view is that the Plan significantly underestimates the amount of employment land required in the Borough to meet its needs and reflect the wider economic ambitions the region. On this basis, Policies DS2(S) and DS5(S), and the Development Strategy Options Paper and Sustainability Appraisal ('SA') evidence on which they are based, only seek to deliver the scale of employment growth identified in Policy DS4(S). The policies are not, therefore, considered sound (i.e. are not positively prepared, justified, effective or consistent with national policy). Overall, Policy DS5(S) fails to identify sufficient employment land, including to the South of Bedford at Kempston Hardwick, to meet anticipated economic and employment needs over the plan period in accordance with paragraph 82 of the NPPF.
- 2.4 National Policy therefore provides a clear, positive context with a clear requirement to meet identified needs in an aspirational but deliverable fashion. Importantly, the NPPF does not state that Plans should adopt a 'do minimum' approach; instead it promotes ambitious growth, where it is carried out in a sustainable fashion.

Employment Needs

- 2.5 The evidence underpinning these policies has failed to consider all reasonable alternatives, including a larger amount of employment land. The SA's assessment of the employment land options is flawed. It considers three options: C) 90Ha (more high-density office development); D) 142Ha; and E) 206Ha (lower density office/ business park dev with more warehousing). These options do not appear to be consistent with those presented in the Employment Land Study 2022. In addition, the SA concludes that 'Option E' (i.e. the option delivering the most employment) is worst performing including in terms of 'improving air quality', 'reducing carbon dioxide', 'improving

energy efficiency’, ‘reducing the need to travel and promote sustainable modes of travel’.

- 2.6 The SA appears to have reached this conclusion on the basis that this option would result in greater increase in private car use and commercial vehicle use than other options with less warehousing. However, this assessment is overly simplistic and fails to consider that the Council’s strategy of relying on neighbouring authorities to meet strategic warehousing needs could result in promotion of less sustainable commuting patterns and freight movements than would be the case than if those needs were met locally within close proximity to the existing and proposed population in Bedford. It also fails to recognise the strategic importance of logistics as critical infrastructure nationally, regionally, and locally or the Government’s ambitions to achieve a net zero freight sector by 2050.
- 2.7 Option E also scores more poorly than Option D against the objective of promoting a strong, sustainable, and balanced economic growth stimulating job creation across a range of sectors. It is not clear why this is the case; the SA simply suggests that low density office development with greater proportion of warehousing “uncertain whether this will be viable locally”. The market evidence above clearly demonstrates that warehousing is viable in this location.
- 2.8 The Development Strategy Options Paper (‘DSO’) and SA also consider a range of strategy options as ‘reasonable alternatives’. The SA notes that for the purpose of identifying ‘reasonable alternatives’ the aim is to consider options that could meet the dwelling and employment requirement to 2040. However, it later goes on to state that the employment requirement is not considered an overriding constraint in generating options. Indeed, it is acknowledged in the DSO that most of the ‘reasonable alternatives’ identified would fail to achieve the amount of employment land contemplated in the Plan without additional sites being identified along the A421 corridor. Overall, whilst we agree with and support the identification of the area around Kempston Hardwick as a location for significant growth, AWG is concerned that the approach to the distribution of other employment land in the Borough is not appropriately justified.
- 2.9 AWG is also concerned that the approach taken means that the opportunity presented by a larger Business Park, incorporating a mix of employment uses, on AWG land to the South of Bedford as part of the overall spatial strategy and distribution of employment growth, has not been appropriately considered or assessed as a ‘reasonable alternative’ as part of the Council’s Local Plan evidence base. This approach risks missing a major opportunity for economic growth on a transformative scale that is well-located to benefit from improved rail connectivity.
- 2.10 More generally, the Council’s approach to the assessment of and selection of ‘other employment sites’, particularly those along the A421 Corridor, is not clear or transparent. Para 5.18 of the DSO states that other potential employment locations “have been assessed according to their accessibility, visibility and proximity to strategic transport routes, and their compatibility with neighbouring uses”. However, there does not appear to be any evidence of this in the evidence provided beyond the general site assessment proforma in the appendices to the HELAA and no explanation on how judgements have been reached about particular sites.
- 2.11 AWG remains concerned that the Council’s proposed spatial strategy results in a ‘piecemeal’ approach to employment development elsewhere across Borough, and an

over-reliance on ‘innovation’ uses to deliver its economic needs. This approach would result in a number of individual developments without the critical mass to generate the level of investment required to facilitate the infrastructure needed and deliver sustainable economic development. It is also unlikely that innovation uses would be able to generate the significant uplifts in land value that major industrial and logistics schemes generate and that are often needed to fund strategic infrastructure requirements (e.g. new and improved junctions on the strategic road network and link roads).

- 2.12 A piecemeal approach to employment development across Bedford and over-reliance on innovation uses would result in individual developments each without the critical mass and market conditions to generate the level of investment required to facilitate the infrastructure needed to support the scale of development anticipated and deliver sustainable economic development.

Housing Needs

- 2.13 Paragraph 15 of the NPPF (2021) requires Local Plans to, inter alia, provide a framework for addressing housing needs and other economic, social, and environmental priorities.
- 2.14 Paragraph 16 states that Local Plans should be prepared with the objective of contributing to sustainable development and be prepared positively in a manner that is aspirational as well as deliverable.
- 2.15 The NPPF also requires (para 23) that the Strategic Policies of the Plan should provide a clear strategy for bringing land forward to meet objectively assessed needs in line with the presumption in favour of sustainable development (para 11), and, in doing so, allocating sufficient sites to deliver the strategic priorities of the area.
- 2.16 National Policy therefore provides a clear, positive context with a clear requirement to meet identified needs in an aspirational but deliverable fashion. Importantly, the **NPPF does not state that Plans should adopt a ‘do minimum’ approach; instead it promotes ambitious growth**, where it is carried out in a sustainable fashion.
- 2.17 Bedford Borough sits in a key location within a national area of strategic importance, being at the heart of the Oxford-Cambridge Arc (‘the Arc’). Whilst the timetable for the Local Plan does not align with that of the Arc Spatial Framework, our client supports the approach being taken by BBC of progressing the Local Plan in advance of the Arc Spatial Framework and consider it is crucial that the Plan is adopted in a timely fashion.
- 2.18 The Local Plan 2030 was adopted on the basis of an early review and was examined against the 2012 NPPF under transitional arrangements. The Local Plan 2030, therefore, whilst being relatively “young” in Local Plan terms, is quite outdated in terms of its approach to housing needs. The level of growth identified and allocated in the Local Plan was based upon historic methods for identifying housing need, and, therefore, suppresses housing need for a recently adopted Plan.
- 2.19 The Local Plan 2040 must, therefore, address this issue in addition to considering housing needs associated with the Arc.
- 2.20 The Standard Method requirement (para 4.7 of the Local Plan) meanwhile, finds the Borough’s housing need to be 1,355dpa, which the Local Plan applies across the plan period of 2020 to 2040, creating a total of 27,100 dwellings.

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- 2.21 The Local Plan 2030 did not, therefore, meet the housing needs as now identified based on the Standard Method. The Inspector’s Report into the 2030 Local Plan recognised (IR para 40) that if the Standard Method had been applied in that instance, then the housing need figure of 1,280dpa would have applied.
- 2.22 The Local Plan then proposes a stepped trajectory approach to deal with housing need, with only 970 homes per annum in 2020-2025, and 1,050 between 2025-2030. There would then be a significant increase to 1,700dpa in the final 10 years of the Plan.
- 2.23 The justification for this approach is due to the over reliance upon strategic allocations which large infrastructure requirements.
- 2.24 This is not considered a sound approach and is effectively putting all the Council’s ‘eggs in one basket’. It is not justified by the evidence and the Local Plan.
- 2.25 In particular, the Sustainability Appraisal testing of the ‘stepped approach’ is fundamentally flawed, with the justifications given for positive scores around items such as previously developed land (see SA Appendix 8 p. 113) being conjecture. The statement that the stepped approach would have a more beneficial effect on development on previously developed land is incorrect; sites which are previously developed land can come forward irrespective of the stepped approach and the SA does not identify any previously developed land south of Bedford that benefits from the new rail stations and links. Indeed, the allocations at locations such as the Wixams are not on previously developed land but greenfield land. The SA must, therefore, be re-run with a correct assessment of the stepped approach.
- 2.26 A correct assessment of the stepped approach in the SA would identify that there are risks with being reliant upon so much growth linked to strategic infrastructure outside of the control of developers and the Council. This would in turn mean that many of the benefits may not be realised, or realised later in the plan period, pushing housing delivery outside of the plan period.
- 2.27 This is particularly evident in this area, with the still awaited deliver of the Wixams rail station. That station was due to be completed in 2015 and is now timetabled for opening in 2024.
- 2.28 Instead, the Plan should take a more balanced approach, with a reduction in numbers on some of the strategic sites and the delivery of smaller strategic allocations which can come forward earlier and increase housing delivery in the period to 2030.
- 2.29 The Local Plan is not sound, as it is not justified or effective. To make the Plan sound the trajectory should be amended. Reflecting the fact that the Local Plan may not be adopted until 2023, and thus higher delivery in 2024 (compared to the Local Plan 2030), the trajectory should be as follows:
- 2020/21- 2023/24: 970dpa
- 2024/25 – 2039/40: 1,423dpa
- 2.30 Aligned with this, new allocations will be required, and a reduction in the number of dwellings on some strategic sites may be required. These matters are dealt with below.

Plan Period

- 2.31 Turning to the matter of Plan length, AWG consider that the Plan Period should run to 2050. A period to 2040 is only 10 years beyond the existing Local Plan and is not a sufficiently long enough extension to effect real change.
- 2.32 As the Council will be aware, strategic growth and development, along with wide scale change, takes many years to deliver. Sites take a long time to plan correctly and then commence delivery, and thus a longer Plan Period should be allowed for.
- 2.33 Furthermore, by extending to 2050, this would bring the Plan in line with others in the Arc, such as the MK2050 Vision and the Oxford 2050 Plan. Given the strategic and important role that Bedford Borough plays within the Arc, **it would represent 'good planning' and a holistic approach to align the Local Plan Period with those other areas.** The next review of the Local Plan would then not need to extend the Plan Period, but instead revise housing and employment growth to reflect the latest position as relevant at that time

3.0 Climate Change

- 3.1 The first statement contained within the Local Plan's Vision (Chapter 2) rightly sets an aim of tackling climate change and adapting to and mitigating its effects being at the heart of new development in the Borough.
- 3.2 This is then reinforced, with Theme 1 (p.13) setting an objective to making Bedford Borough a carbon neutral Borough. The Local Plan, however, does not currently carry this commitment through in such a way as to suggest meaningful action.
- 3.3 Firstly, the Local Plan does not include any proposed strategy or approach concerning renewable energy development. If the Borough is serious about becoming carbon neutral and tackling climate change, it is essential that the Local Plan includes positive policies which encourage both renewable energy developments, and net zero carbon developments, to come forward.
- 3.4 The NPPF is clear (Chapter 14 – para 152 in particular) that the planning system should, inter alia, support renewable and low carbon energy and associated infrastructure. Para 153 states that Plans should take a proactive approach to mitigating and adapting to climate change.
- 3.5 Moreover, para 155 states that Plans should both provide a positive strategy for energy from renewable and low carbon sources and consider identifying suitable areas for such developments.
- 3.6 The Local Plan fails to tackle this issue. As currently drafted, it lacks any meaningful proposals or aims in order to meet these requirements of national policy.
- 3.7 AWG supports the principle of Policy DS1(S) and in particular, the importance of development being located to minimise the need to travel and where there are opportunities to maximise the ability to make trips by sustainable modes of transport.
- 3.8 It must encourage growth that comes forward where renewable energy goes hand in hand with development proposals, with positive policies encouraging such developments (be they as allocations and/or applications) to be considered favourably. The NPPF makes particular reference (para 155 c) to identifying opportunities for development to draw its energy supply from decentralised, renewable, or low carbon energy supply, and for co-locating heat customers and suppliers. AWG therefore consider that the Plan is unsound as it is not consistent with national policy. To make the Plan sound, Policy DS1(S) should be revised to include reference to strategic renewable energy, such as onshore wind and solar. There should also be a requirement within the strategic allocations to deliver renewable energy as part of these developments.
- 3.9 Of further concern is the lack of any focused evidence base document(s) addressing these matters. The list of Local Plan 2040 Supporting documents provided by the Council is absent any topic papers, studies or the like which address these matters.
- 3.10 It is essential that BBC undertake such work as a matter of urgency and revise the Local Plan ahead of submission.

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- 3.11 The Sustainability Appraisal ('the SA') should also be updated to reflect this requirement. The climate crisis is a significant, national issue and the SA methodology must be amended to provide greater weighting to matters relating to climate change and energy.

4.0 South of Bedford (Policy HOU12) and Kempston Hardwick New Settlement (Policy HOU14)

- 4.1 For the reasons set out earlier in this response, AWG strongly supports the principle of the South of Bedford Area as a focus for environmental-led and sustainable growth. However, for the reasons set out below, AWG considers the focus of the Plan and Policy HOU12 on the delivery of an “*innovation hub*” at Kempston Hardwick to be unsound. This fails to recognise the importance of other sectors and locational advantages of the south of Bedford area and the Kempston Hardwick site, particularly for industrial and logistics uses. The overreliance on innovation uses also poses a threat to the delivery of the overall employment and economic needs of the area. Furthermore, the proposed mix of uses, density and quantum of housing is likely to lead to a shortfall in housing across the HOU12 area. This is considered in more detail below.
- 4.2 AWG support the principle of Policy HOU14 and the proposed new settlement at Kempston Hardwick. Cloud Wing set out, in detail, their comments in respect of the Vision, and Policy HOU12 (south of Bedford Area) and these representations should be read in conjunction with that submission.
- 4.3 The strategy of focusing growth on the south of Bedford area (Policy HOU12) is supported by AWG. However, AWG find that the approach taken to allocating sites and, in particular, the quantum of development allocated on certain sites, is not justified nor consistent with national policy, for the following reasons.
- 4.4 Firstly, the Local Plan does not put dwelling numbers against allocations HOU13, HOU15, HOU16 and HOU17. The Policy must be amended to do so that there is a clear understanding and expectation as to the quantum of development that the Plan is proposing in these locations.
- 4.5 Upon review of the Stepped Trajectory Topic Paper (April 2022), numbers have been proposed against these sites as follows:
- HOU13: 500
HOU15: 300
HOU16: 1800
HOU17: 1000
- 4.6 What is not evident from the evidence base or the Local Plan, is the approximate developable areas and thus whether these are realistic densities. Upon examination of the Policies for each site, and the Figures in the Local Plan which accompany each, the only way to achieve all the Policy requirements, in particular the amount of open space and green infrastructure, would necessitate very high densities on most of these sites (c. 50/60+ dph).
- 4.7 There is no evidence accompanying the Local Plan which justifies this approach; the HEDNA does not identify such a high requirement for small (1-2 bedroom homes) which a high density would lead to, nor is there market evidence supporting housing demand for such a high quantum of small units in these locations.

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- 4.8 This is likely to lead to future applications which either decrease the number of homes, resulting in unmet need (in terms of overall quantum and/or mix) and possibly non-delivery of key infrastructure. Alternatively, it may lead to non-delivery of green infrastructure due to pressures to deliver housing numbers.
- 4.9 The quantum for each allocation is not based on a proportionate or robust evidence base and are therefore not sound.
- 4.10 To make the Local Plan sound, additional allocations are therefore necessary to make up this shortfall in numbers. Doing so would have the further benefit of addressing the stepped trajectory shortcomings as set out in Section 2 of these representations.
- 4.11 AWG supports the principle of the allocation of the land at Kempston Hardwick for development. However, for the reasons set out in detail in Cloud Wing's representations, Policy HOU14 proposes insufficient employment land on the parties' land at Kempston Hardwick. AWG also has significant concerns over the overreliance and inappropriate emphasis on delivery of innovation uses at the site, which do not appear to be justified and pose risks to the delivery of economic needs and the overall effectiveness of the Plan. The allocation should state "employment uses", rather than specifically identifying innovation uses.
- 4.12 AWG is also concerned by references in the draft Plan and its supporting evidence which suggest that development at Kempston Hardwick and other strategic sites would only be able to come forward post-2030 following the delivery of East-West Rail and completion of various highway improvements, which in turn appears to be driving the Council's proposed approach to a stepped housing trajectory.
- 4.13 For the reasons set out in detail at paragraphs 6.9 to 6.69 of Cloud Wing's representations, a larger amount of employment land, including industrial and logistics uses, could start to be delivered earlier than 2030. The site is already a suitable location for employment growth. It is accessible by public transport and would be capable of supporting early delivery of infrastructure improvements including improvements to the surrounding highway network (i.e. the package of improvement works to Junction 13 of the M1 and the junction of the A6 and A421 which have been developed in detail through discussion with Highways England as part of the outline planning application for the Bedford Business Park) and deliver sustainable transport improvements (i.e. improvements to pedestrian and cycle accessibility and public transport).
- 4.14 Residential development, meanwhile, can come forward in advance of much of the necessary infrastructure. The land at Elms Farm (considered below) is one such location where homes can be delivered early, without the requirement for strategic infrastructure.
- 4.15 On this basis, the Plan and draft Policy HOU14 risks unnecessarily delaying delivery of housing and job growth in a sustainable, suitable location and failing to meet economic needs in the short-term.
- 4.16 AWG supports the principle of mixed-use development and the allocation of the land in HOU14 as a strategic allocation for growth in Bedford Borough. For the reasons set out above, the quantum of employment development should be increased, and the loss of residential development can be made up through allocating additional land which directly adjoins the HOU14 area.

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- 4.17 In this context, AWG’s view is that it is entirely inappropriate for development at the site to be delayed until late in the plan period and for the policy to prevent permission being granted until such time that a Supplementary Planning Document has been prepared by the local authority. Whilst we agree that further work would be required to develop a robust Infrastructure Delivery Plan for the site and support the Council’s view that development at Kempston Hardwick should be landscape-led and of high-quality design, underpinned by an appropriate masterplan, the proposed approach has the potential to delay and undermine delivery of development early in the plan-period. The Policy should, therefore, be amended to allow flexibility for the landowners/ developers to prepare their own masterplan and design code, in accordance with paragraph 129 of the NPPF.
- 4.18 The detailed criteria set out in Policy HOU14, the concept plan and the infrastructure identified in the Infrastructure Delivery Plan and Transport Strategy would also need to be reviewed, updated, and amended, as appropriate, to reflect changes to the quantum and mix of residential and employment development proposed in response to our comments earlier in this response.
- 4.19 The next section of these representations puts forward a case as to one such location for growth within the southern parishes, which would deliver growth in accordance with Policy HOU12, on a site which has erroneously been discounted from the site selection process
- 4.20 These remainder of these representations focus on an area of land, known as Elms Farm, which is partly included and partly excluded from Policy HOU14.
- 4.21 As set out earlier in this response, Elms Farm is located in a sustainable location, adjacent to Woburn Road, Manor Road, and the roundabouts on Fields Road. It is a gateway location at the key entrance to the HOU14 allocation area when travelling from the west and along the A421, and is, therefore, a prime location for a high-quality development as part of this wider allocation.
- 4.22 The land at Elms Farm does not appear to have been assessed by the Council, despite its location and the fact that part of the site is included within the HOU14 area. Whilst the site has not previously been put forward through the Call for Sites process, it is in a sensible and logical location for development.
- 4.23 Planning Practice Guidance (PPG) Housing and economic land availability assessment paragraph 11 (reference ID: 3-011- 20140306) states:
- “Plan makers should not simply rely on sites that they have been informed about but actively identify sites through the desktop review process that may have a part to play in meeting the development needs of an area.”
- 4.24 Neither the SA, nor any other evidence base document, make any reference to any such action having taken place.
- 4.25 HOU14, instead, is presented with an arbitrary boundary through the middle of a field partly within the Elms Farm premises. Instead, the boundary for HOU14 should be extended to Manor Road and Woburn Road, as a logical and clear permanent boundary for the allocation.
- 4.26 This would increase the amount of land available for residential development, contributing to the housing shortfall identified earlier in this response. Moreover, as the

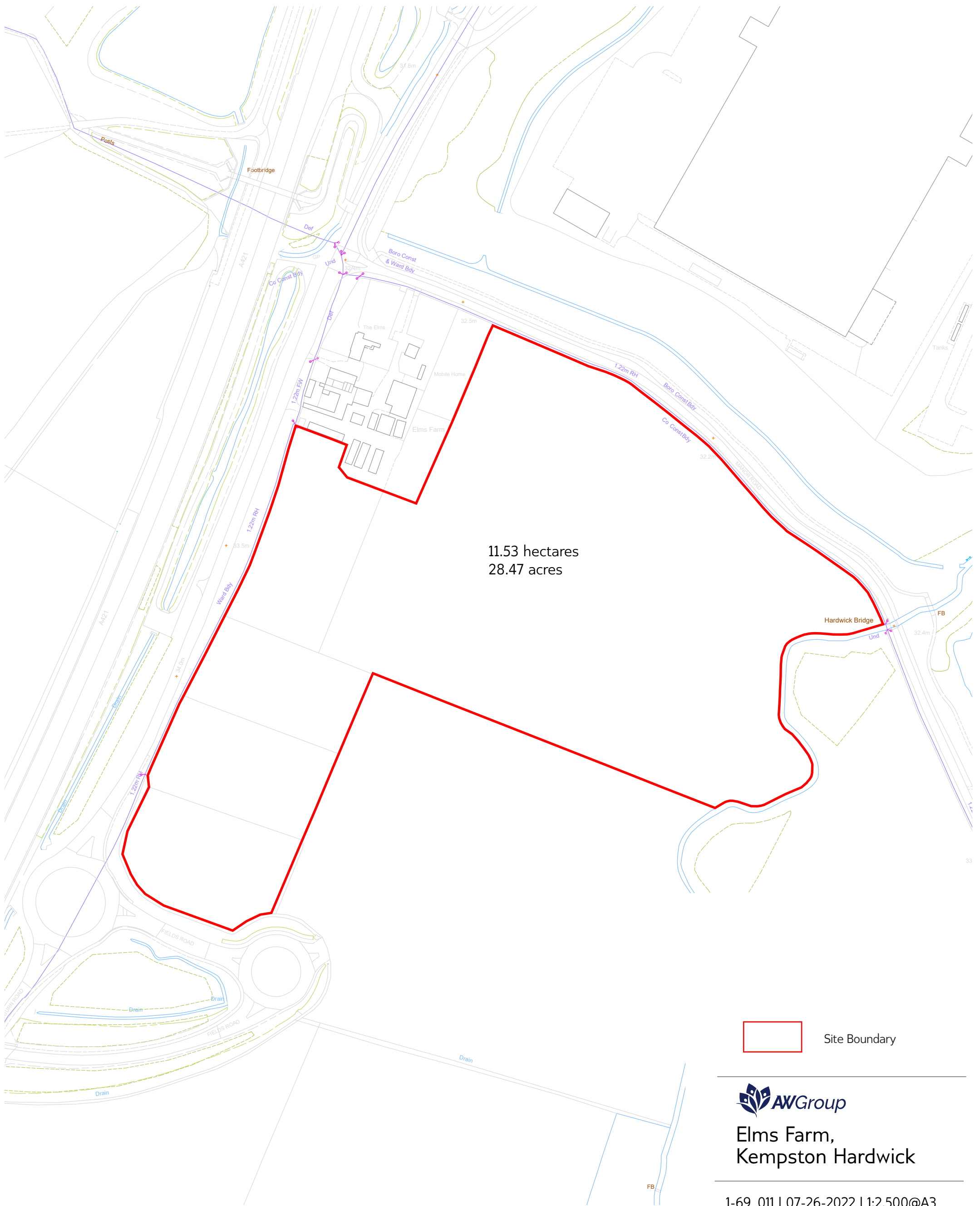
Elms Farm site adjoins the roundabouts on Fields Lane and is a gateway site, it can deliver early and also contribute to the housing trajectory, similarly responding to the stepped trajectory point.

- 4.27 The land at Elms Farm, is readily available, in single ownership from a company with a proven track record of delivery.
- 4.28 The Local Plan evidence base finds that this location is a logical and appropriate location for residential development; The Site would accord with the development strategy for BBC and would deliver housing in a sustainable location, as advocated in the NPPF.
- 4.29 As currently drafted, the Local Plan is unsound as it is not justified based on the evidence base, nor is it effective given it will create an arbitrary boundary, leave an area of land that is not practical for modern day farming, and will fail to deliver sufficient housing to meet identified needs.
- 4.30 The boundaries for HOU14 should therefore be amended and the allocation must include the land at Elms Farm to make the Local Plan sound.

5.0 Summary and Conclusions

- 5.1 These representations have been prepared on behalf of Arnold White Group, a strategic landowner and promoter with a proven track record of delivery of housing, commercial and renewable energy developments in Bedfordshire.
- 5.2 This response finds that the Local Plan is not sound as drafted, but is capable of being made sound. It does not meet housing or employment needs. The level of employment growth proposed in the Plan is not sufficient to meet local needs, nor does it facilitate Bedford Borough's active shaping of the Arc Spatial Framework in this area. Meanwhile, a number of allocations are overly ambitious regarding the quantum of residential development allocated and additional land is therefore needed to fully meet the identified local needs.
- 5.3 The approach to the timing of development coming forward, and the stepped trajectory, is not based on a proportionate evidence base and is not justified. An alternative approach, as set out in these representations, is required to make the Local Plan sound.
- 5.4 The Local Plan also fails to adequately address climate change, with a complete failure to meet the NPPF requirements and an absence of any evidence base documents that grapple with this issue.
- 5.5 The proposed allocation HOU14 fails to fully take into account all available land and draws an arbitrary boundary, not based on any recognisable features on the ground. Policy HOU14 must be updated with a new boundary on Manor Road and Woburn Road, taking in the full extent of Elms Farm, in order to make the Local Plan sound.

Appendix 1: Elms Farm Location Plan



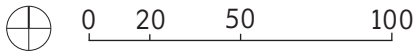
11.53 hectares
28.47 acres

 Site Boundary



Elms Farm,
Kempston Hardwick

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built form
resource





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