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BEDFORD LOCAL PLAN REVIEW

LOCAL PLAN 2040
DRAFT PLAN STRATEGY OPTIONS AND DRAFT POLICIES CONSULTATION

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1.0 INTRODUCTION

1.1 These representations are made by **DLP Planning Ltd** . Comments are made on the Draft Local Plan 2040 and supporting evidence base, as far as is available at this point.

1.2 Details of our client's specific site interests have been submitted as part of the 'Call for Sites' exercise undertaken previously in 2020 and attributed reference number ID:701.

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

Summary of Local Plan 2030 and Requirement for Immediate Review

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

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

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

2.3 Paragraph 18 of the Inspector's Report confirms that Policy 1 cannot set the parameters of the updated Local Plan. While there is a desire for alignment with the delivery of cross-boundary strategic priorities (including those related to the delivery of the Oxford-Cambridge Arc) the requirement for review is a result of the deficiencies with the approach put forward by the Council in the Local Plan 2030.

2.4 The appointed Inspectors determined (in the context of the 2012 Framework) it would not be effective for the policies of the Local Plan 2030 to look beyond that date. The findings of soundness are predicated on the context of a very narrow remit of addressing the area's strategic priorities (and even then, only with the application of the three-year 'guillotine' following adoption).

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2.5 It is not open to future Inspectors to reach the same conclusion. This emphasises the importance of the of the first paragraph of Policy 1 and the overriding objective of the aim of the review to secure levels of growth that accord with government policy. This establishes grounds for a Plan that must be fundamentally deliverable / developable over than plan period and cannot further defer relevant decisions relating to options to meet the area's strategic priorities.

2.6 In not fully responding to the reasons and scope of requirements for the review and subsequent update of the Local Plan the Council risks rolling forward several of the same fundamental shortcomings in the Local Plan 2030. This is not only contrary to the objectives of sustainable development but in the context of the most recent policy and guidance simply fails to provide the basis for a sound Local Plan.

National Policy and Guidance

2.7 The most recent version of the National Planning Policy Framework was published in July 2021, following commencement of this Preferred Options consultation. However, the changes were published in draft format in January 2021 (including those relevant to the plan-making framework) and thus available for the Council to consider.

2.8 These representations highlight four important components of the 2021 Framework and the changes they necessitate for the scope of the review, relative to the 2012 version of the Framework against which the current Local Plan 2030 was assessed. Other specific provisions of the Framework and NPPG are referred to in comments relating to detailed elements of the consultation proposal.

2.9 Firstly, Paragraph 22 of the NPPF2021 confirms that strategic policies should look ahead over a **minimum 15-year period** from adoption and anticipate long-term requirements. This is a significant change from paragraph 157 of the 2012 Framework that specified that policies should be drawn up over an appropriate timeframe and only preferably a 15-year horizon.

2.10 Secondly, the second paragraph of NPPF2021 Paragraph 22 is a significant addition following the most recent revisions. This requires that **policies should the address a vision that looks further ahead (at least 30 years) where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area**. The transitional arrangements for these provisions at Annex 1 confirm their application to the preparation of all Plans except those that have already undergone consultation on the Submission version Plan. The Oxford-Cambridge Spatial Framework is also seeking to cover the period to 2050 (i.e., 30 years).

2.11 The Council's Preferred Options clearly anticipate reliance on these approaches to growth and the associated implications in terms of extended timescales for development. None of the Council's Preferred Options set out the proposed approach beyond a 20-year horizon. As a result, detailed policies for the scale and distribution of growth cannot be considered consistent with national policy without significantly extending their scope alongside provision for the other requirements of sustainable development.

2.12 Thirdly, the requirements of Policy 1 of the Local Plan 2030 accord with the circumstances outlined at Paragraph 33 of the NPPF2021 where a significant change in circumstances is identified as a result of the calculation of local housing need. Paragraph 61 of the NPPF2021 outlines that **minimum annual local housing need should be calculated using the government's standard method**. This is translated into the requirements against which plans must be assessed for soundness in terms of ensuring they are positively prepared and

seek to meet needs in full (see NPPF2021 paragraph 35 and footnote 21) alongside the consideration of unmet needs from neighbouring areas. NPPF2021 paragraph 31 also emphasises the importance of considering relevant market signals.

2.13 The NPPG provides further clarification that the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Circumstances where it may be appropriate to plan for a higher housing need figure than the standard method indicates include any growth strategies for the area and strategic infrastructure improvements that are planned for (ID: 2a-010-20201216).

2.14 The Council accepts that there are no exceptional local circumstances that justify deviating from the standard method but the Preferred Options do not assess any alternative approach identifying a higher need than calculated by the standard method (that will typically be considered sound) (ID: ID: 2a-015-20190220). The assessment of market signals should include expected changes in the labour market, engagement with stakeholders for economic development and changes that may affect the anticipated population and local housing stock (ID: 2a-027-20190220).

2.15 Finally, Paragraph 35 of the NPPF2021 confirms that the criteria for the assessment of soundness have changed since the 2012 Framework. In order to provide for a justified approach the policies for the Plan must provide for '**an appropriate strategy**' rather than the 'most appropriate' strategy when assessed against reasonable alternatives. Paragraph 32 of the NPPF2021 provides further detail on the basis for assessing the proposed strategy in terms of seeking net gains for sustainable development and ensuring that the Plan has addressed relevant economic, social and environmental objectives.

2.16 In summary, there is no longer any support in national policy for the outcomes of the Local Plan 2030 Examination in terms of pursuing constraints to the plan period and overall level of growth and deferring decisions on key components of approaches to meet strategic priorities for the area (particularly in terms of overall housing need (including affordable housing) and the delivery of social and community infrastructure (including health and education).

Other Material Considerations

Emerging Oxford Cambridge Arc Spatial Framework

2.17 The proposed Oxford-Cambridge Spatial Framework will have the status of national policy and is intended to form a material consideration for plan-making alongside the National Planning Policy Framework.

2.18 The government is currently seeking view on priorities for the Framework as part of consultation on the document 'Creating a Vision for the Oxford-Cambridge Arc' (until October 2021). The latest consultation proposals set out that it will aim to guide sustainable planning and investment decisions under four policy pillars:

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

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

2.20 Paragraph 3.8 of the policy paper sets our that the government expects:

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

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

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3.0 REPRESENTATIONS – DRAFT PLAN VISION, OBJECTIVES AND STRATEGY OPTIONS

Comments on Strategy Options / Proposed Approach and Supporting Evidence

Paragraph 1.5 (proposed plan period)– Object

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

Reasoning

3.2 The larger-scale approaches to development (including new settlements) that the Council has identified as part of its Preferred Options accord with the circumstances that national policy identifies for considering a minimum 30-year horizon, to take account of longer timescales for development.

3.3 Paragraph 1.2 of the 'Creating a Vision for the Ox-Cam Arc' consultation document also confirms that the Spatial Framework will extend to 2050 and beyond. Preparation of the Bedford Local Plan 2040 should be undertaken consistently with this aim.

3.4 The proposed plan period of 2020 to 2040, particularly when read in the context of the Council's Preferred Options resulting in a further delay to meeting development needs in full (until at least 2030) will generate a requirement for further, successive, reviews and is setting the plan up to fail.

Remedy

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

3.6 Those parts of the Council's Preferred Options relying on larger-scale development should be profiled to look further ahead to 2050.

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

Paragraph 1.10 (alignment with the Spatial Framework)– Comment

3.8 The Council's Preferred Options published for consultation contend that they draw heavily on the 'pillars' of economic development and the natural environment from the emerging

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

Reasoning

3.9 It is surprising, and inconsistent with national policy and the emerging objectives of the Arc Spatial Framework, makes no mention of the connectivity or place-making pillars of the Spatial Framework. Each should be considered of equal importance.

3.10 Specifically, paragraph 4.1 of the consultation document 'Creating a Vision for the Oxford-Cambridge Arc places significant emphasis on reducing the need to travel. Connectivity is not just about strategic road/rail links - it means:

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

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

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

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

Remedy

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

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

3.14 We do not object to the plan meeting LHN in full but the Council has not fully tested options to meet higher potential levels of growth as required by the NPPG (ID: 2a-015-20190220). The assessment of market signals should include expected changes in the labour market, engagement with stakeholders for economic development and changes that may affect the anticipated population and local housing stock (ID: 2a-027-20190220).

Paragraph 1.14 (Scope of the Plan) – Object

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

Reasoning

3.16 As set out in the Spatial Framework consultation document (paragraph 5.5) the Arc demonstrates poor affordability where development has not kept pace with need. That is exactly the position in Bedford resulting from the approach adopted in the Local Plan 2030.

3.17 This means (at paragraph 5.7) it is an aim of the Framework to ensure that the Framework sets policies to enable ***housing needs to be met in full, including much-needed affordable housing***

3.18 This sits alongside strategic decisions where direction will be provided by the Framework e.g. implementation of East-West Rail, identification of Opportunity Areas and support for the delivery of previously developed land.

3.19 What this means in practice is that prioritizing opportunities to meet full development needs is an important component of the place-making pillar as part of a joined-up approach providing for sustainable communities.

3.20 The Council's proposals in its Preferred Options consultation proposals would sustain a very substantial shortfall against minimum annual local housing need until at least 2030. Due to only considering a horizon to 2040 and as a result of likely timescales for the characteristics of larger-scale development (including new settlements) it is furthermore highly likely a significant shortfall against full development needs will persist until 2040 and beyond.

3.21 The Council's proposed strategy offers no flexibility and choice to address the current and persistent failure to meet needs in full. Our assessment indicates that current levels of development are likely to become significantly constrained substantially before any of the longer-term solutions proposed as part of the Preferred Options achieve significant delivery. Realistic assumptions must also be made in relation to new larger-scale developments.

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Paragraphs 1.47-1.48 (Neighbourhood Planning) – Object

3.22 The Council's consultation document considers the role for development allocations to be identified in Neighbourhood Plans (as a result of the strategy in the Local Plan 2030) in the context of updates to the development strategy explored via the Preferred Options.

3.23 These representations identify that the consultation fundamentally fails to assess the role and ability of Neighbourhood Plans in meeting the requirements for sustainable development (including housing delivery) in the period to 2030. The consultation proposals also provide no clarity on the impact of meeting additional requirements for growth in terms of whether the policies in 'made' plans will remain in general conformity with the development strategy nor how further allocations might be provided for in an effective and positively prepared manner.

Reasoning

Relationship with Delivery of the Area's Strategic Priorities

3.24 Paragraph 1.47 of the consultation proposals repeats the strategy outlined in Policy 4S of the adopted Local Plan. This does not confirm a realistic prospect that all 2,260 units will be delivered before 2030. There are outstanding objections to several of the emerging Neighbourhood Plans at Key Service Centres (e.g. Great Barford).

3.25 At paragraph 1.48 the Borough Council only provides vague indications of where further engagement might take place with parish councils to meet additional requirements for growth where a range of suitable sites are identified.

3.26 This paragraph is inconsistent with the intentions for a stepped trajectory and the NPPG for reviewing NDPs (which should encourage early review when strategic policies have changed). That is an inevitable consequence of the development plan in Bedford given its current failure to address levels of growth in accordance with the standard method. The Borough Council's own evidence indicates the strong likelihood of sites where early delivery can be prioritised. This does not demand that meeting increased requirements for growth should extend beyond 2030.

3.27 Paragraph 28 of the NPPF2021 reaffirms the role for Neighbourhood Plans in providing for non-strategic allocations. Paragraph 29 confirms this must be within the context of Neighbourhood Plans that do not promote less development than set out in adopted strategy policies (which in this case will be replaced in the Local Plan 2040). Paragraph 66 of the NPPF2021 outlines that strategic policies should set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. This is an important distinction from the 2012 version of the Framework. However, the Council's testing of options for the Local Plan 2040 rolls forward a 'one-size fits all' distribution of potential levels of growth in Key Service Centres and Rural Service Centres.

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3.28 This fundamentally fails to accord with the current requirements of national policy and guidance and, importantly, has currently precluded the Council from considering 'hybrid' alternatives to the spatial strategy that would allow appropriate levels of sustainable development to be prioritised across the settlement hierarchy.

Identification of Housing Requirements for Designated Neighbourhood Areas

3.29 The Council's proposed approach is contrary to paragraphs 66 and 67 of the NPPF2021. Paragraph 66 sets out that strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. The Council's suggestion of rolling forward the contribution from the scale and distribution of growth identified in Policy 4S of the LP2030 is not justified and not positively prepared.

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

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

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

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

3.33 Any impacts upon the evidence based for emerging Neighbourhood Plans must be read

alongside PPG ID: 41-084-20190509, which answers the question 'when will it be necessary to review and update a neighbourhood plan' and states in relation to the above issues:

> *"There is no requirement to review or update a neighbourhood plan. However, policies in a neighbourhood plan may become out of date, for example if they conflict with policies in a local plan covering the neighbourhood area that is adopted after the making of the neighbourhood plan. In such cases, the more recent plan policy takes precedence."*

Remedy

3.34 The solution to issues identified in these representations necessitates the Council complying with the requirements of paragraphs 66 and 67 of the NPPF2021. In doing so, we consider that a 'hybrid' development strategy must remain supported throughout the plan period, including recognition of the contribution that this would make towards the shortfall against local housing need for the period 2020 to 2030 i.e., through 'top up allocations'.

3.35 Without prejudice to any specific conclusions from this work this would support inclusion of 'village-related' development as a component of future growth.

3.36 For Rural Service Centres (with the exception of the reclassification of Oakley) it appears proportionate in the first instance to apply a pro-rata addition to levels of development envisaged in Policy 4S of the current LP2030 (i.e., a minimum 25-50 dwellings to 2030). Proportionate additional development in these settlements has the greatest potential to increase the pace of development and diversify supply and any increase could be achieved before 2030 in many cases.

3.37 The benefits of such an approach would significantly and demonstrably outweigh any harms given the potential to support the most appropriate locations for growth in each settlement from a range of site options.

Section 2 (Draft Vision) – Object

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

Reasoning

3.39 The draft Vision sets out:

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

3.40 This aspect of the Vision will not be achieved in the context of the Council's Preferred Options omitting a significant number of the borough's settlements from the spatial strategy and do

not seek to provide for the additional development required to secure balanced communities.

3.41 The Vision further states:

> *"Rural communities will embrace appropriate development, in many instances through the preparation of their own neighbourhood plans."*

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

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

> *"Provide appropriate amounts and types of housing to meet the needs of the borough's urban and rural communities over the lifetime of the Plan making the housing stock more adaptable and resilient*
>
> *Achieve a borough where everybody has appropriate access to high quality health and social care, as well as everyday essential services and community facilities where social and cultural wellbeing are supported, enabling all residents to lead healthy and independent lives."*

3.44 The principle of these objectives is supported but is reliant on flexibly supporting diverse opportunities for development across the settlement hierarchy. There are a substantial number of centres where the level of development identified is sufficient to secure the opportunities identified.

Paragraphs 3.15 – 3.18 (Spatial Strategy Options) – Comment

3.45 Whilst our client's first preference would be for a more dispersed approach to growth across the borough to ensure that sustainable development occurs in all settlements (i.e. Grey option in 2020 Issues and Options consultation), of the spatial strategy options the Council has indicated as 'preferred' the most appropriate in our client's case is **Option 2d):** (Development in and around the urban area, plus A421 transport corridor with rail based growth parishes, southern parishes and east parishes, plus one new settlement.)

3.46 However we cannot support this option as it erroneously omits Renhold/Salph End Parish as on of the 'eastern parishes'. There is no clear evidence to support which Parishes have been selected as either 'southern', 'eastern' or 'rail-based' parishes. If parishes are to be identified in this way, there should be a clear and justified rationale for inclusion/exclusion.

3.47 The Parish of Renhold/Salph End should be included within Option 2d) as it offers a

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sustainable location for growth that is both edge of Bedford Urban Area and within easy reach of the A421. This is evident from the Council's own Settlement Hierarchy Study (September 2018) which confirmed that when combined as Renhold incl. Salph, Green and Church End Parish, it scores as the 11th most sustainable settlement in the Borough (Table 2, Iteration 2) equal with Stewartby Parish (a parish taking a significant amount of growth). In the assessment Renhold incl. Salph, Green and Church End Parish scores higher than the settlements of Kempston Rural (=22nd), Cardington (=24th), Cople (21st), Little Barford (=62nd), Roxton (=18th), Willington (14th), Wyboston (20th) and Wixams (17th), yet falls to be categorised as a 'Group 3' settlement in the hierarchy, whereas many of those listed above fall into Group 2. This is a clear inconsistency and must be readdressed in the update to the Setttlement Hiearchy Study the Council is intending to undertake.

3.48 The evidence shows that Renhold incl Salph End is a sustainable location for growth. Given its proximity to both the Bedford Urban Area and A421 it should be identified within Option 2d).

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

3.49 The opportunity for transformative change resulting from the delivery of East-West Rail within Bedford Borough is not disputed. However, the Council's own evidence demonstrates that the level of rail-based growth at Kempston Hardwick/Stewartby and Wixams relied upon as part of its Preferred Options is unsound. National Planning Practice Guidance ID: 68-020-20190722 states that a pragmatic approach should be taken when considering the intended phasing of sites, where the authority may need to provide a greater degree of certainty than those in years 11-15 or beyond. The PPG expands on this by stating that where longer-term sites are relied upon evidence must be available to demonstrate that they will come forward within the timescales envisaged and at a rate sufficient to meet needs over the plan period (ID: 68-019-20190722).

3.50 While these sections of the PPG post-date the NPPF2012 it is the case that the Council has historically failed entirely in setting out realistic timeframes for the development of complex sites. These shortcomings have particularly affected Town Centre sites in the past, which the Council will now unsuccessfully rely upon to sustain completions against the housing requirement in the Local Plan 2030. We argued at the previous Local Plan Examination that such sites should be identified as developable no earlier than the 11-15 year period.

3.51 These issues with existing sites will be compounded in the Council's trajectory for the Local Plan 2040 (meaning that even its proposed 'stepped approach' against a requirement of 970dpa to 2030 will not be effective). These representations further demonstrate the lack of evidence to consider rail-based growth in the A421 corridor as developable any earlier than years 11-15 of the plan period (if not beyond) thus rendering the Council's Preferred Options entirely unsound.

Reasoning

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

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

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

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

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

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

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

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

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

3.57 The potential for residential development to occur in conjunction with the delivery of new stations as intended by the Council is likely to require a substantially longer lead-in timeframe.

3.58 The Council has previously acknowledged that longer lead-in timeframes must be allowed for as part of redevelopment of the Stewartby Brickworks (Policy 25) development plan allocation as it exists in the LP2030. The Local Plan trajectory anticipates delivery of only (at most) 100 units in 2029/30 before the end of the current plan period. The scheme is in effect accepted as an 11-15 year developable site.

3.59 Application proposals under reference 18/03022/EIA (validated November 2018) benefit from an Officer recommendation to grant planning permission subject to S106 agreement. In practice, this does not alter any conclusions regarding the deliverability/developability of the site and likely timescales. Discussions surrounding the draft S106 obligation would be anticipated to be extensive. This is reflective of the constraints of the site and gaps in the evidence base for the LP2030, notably:

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

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

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

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

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

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

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

3.65 Delivery of the Station has been delayed by over 11 years with the project still not expected to commence construction until 2023 at the earliest. Commissioning of a detailed design scheme for the proposed station was able to progress earlier in 2021 contingent on the basis of consultation on the proposed northern alignment of East-West Rail.

3.66 While any final decision is awaited on the outcome of the Bedford-Cambridge phase of East-West Rail there remains a risk that the time-limited period for funding available from the lead developers of the Wixams scheme will expire and result in the project not being delivered (or requiring additional monies to address the shortfall in project costs).

3.67 In the context of the above delays and uncertainty and in the absence of a clear timeframe for delivery of the station the Council's Preferred Options present no site-specific evidence of how the additional capacity at Wixams could be achieved over the plan period and at an appropriate build-out rate (in addition to the delivery of extant commitments).

3.68 The characteristics of any potential increase in allocations at Wixams also represents an issue of cross-boundary strategic importance, given that the scheme is being delivered across local planning authority boundaries and the requirement for partial review of the Central Bedfordshire Local Plan 2015 to 2035. This could lead to any potential for additional development being required to address the unmet needs of neighbouring authorities (or affecting the administrative boundaries within which the most appropriate land should be identified).

Remedy

3.69 These representations demonstrate that the rail-based growth component of the Council's Preferred Strategy Options requires substantial further refinement and site-specific testing. This is likely to substantiate a significant reduction in assumptions regarding the potential for

development within the plan period, which can be effectively mitigated through pursuing a 'hybrid' strategy for development in sustainable locations across the borough.

Paragraphs 3.26 – 3.28 (Small Sites) –Object

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

Reasoning

3.71 The Council seeks to rely on evidence of past and expected future trends in windfall development in place of the requirement in national policy to identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare.

3.72 The reasoning for the approach in national policy is simple: the development plan is the most appropriate vehicle to set out positively prepared policies to support the delivery of small sites and enable small and medium developers (who often face the greatest barriers to entry in the sector) to secure implementable planning permissions more easily.

3.73 The Council's own evidence in the Small Sites Topic Paper demonstrates a year-on-year fall in trends in the completion of small windfall sites against the Local Plan 2030 requirement of 970dpa. This is illustrative of issues affecting the sector. The Council must also be mindful of the fact that more recent policies in the development plan (particularly those within Neighbourhood Plans) provide a further barrier to bringing forward appropriate proposals on unidentified sites.

3.74 The evidence from past trends fails to support the Council's contention that windfall supply will provide for 10% of the higher requirement based on minimum annual local housing need for the period 2020 to 2040. The Council relies on expected future trends but the justification for its proposed approach fails for the following reasons:

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

restrictions on additional growth.

Remedy

3.75 There are some positive aspects to the Council's evidence base to support growth on small sites, such as the 136 units' capacity identified in urban areas. In reality we consider that this total should be increased and that in order to achieve the Council's Preferred Options to include allocation of a further 1,500 units within the urban area it will be necessary to maximise the potential contribution from small sites. The Council's total of 1,500 is over-and-above extant development plan allocations within the Town Centre that are and will remain significantly constrained. Failure to diversify urban supply without support through the development plan will result in this component of the spatial strategy being unsound.

3.76 The Local Plan 2040 should also offer substantially greater support for the delivery of small sites in rural areas. This advances the case for the strategic policies of the Local Plan 2040:

- Setting out indicative requirements for all settlements within the borough's hierarchy (outside of Key Service Centres and Rural Service Centres) to encourage provision for appropriate levels of smaller-scale growth
- Proactively support the delivery of rural exception sites
- Where Policy 4S of the Local Plan 2030 is superseded in terms of the scale and distribution of growth required at Key Service Centres and Rural Service Centres ensure that any increased need for development to be provided through reviews of Neighbourhood Plan also has regard to NPPF2021 paragraph 69

3.77 The opportunity for the Local Plan 2040 and any Neighbourhood Plans to be prepared taking a more flexible approach towards the requirements of national policy is supported in principle. For example, where any allocations proposed would offer the opportunity for early delivery and the potential to introduce multiple developers to relevant sites it would be appropriate to treat the 1 hectare threshold pragmatically, recognising that the revised strategy will itself provide substantial opportunities for diversification.

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4.0 RESPONSE TO SITE ASSESSMENT PRO-FORMA (CALL FOR SITES ID 701)

Land West of Wilden Road, Salph End, Renhold (ID: 701)

4.1 The Council's assessment of the site makes a number of assumptions and statements regarding the capacity and suitability of our client's site for development. Some of these are incorrect and therefore our response to each of the points within the assessment is provided in the table below together with a red, amber, green colour coding assessment.

Site Selection criteria	BBC Assessment	DLP Response/ Amendment Proposed
1a. Within or adjoining UAB SPA or built form of a small settlement	X The site is not within or adjoining the urban area or a defined settlement policy area, or within the built form of a small settlement	Disagree. Whilst outside of the defined SPA, the site lies within the wider village and is well related to other built development including adjoining No 34 Wilden Road to the north and properties on Wilden Road to the south. It also sits adjacent to a continuous ribbon of development along Church End.
1e. Outside, adjoining or within the air quality management area	+ The site is not within or adjoining the air quality management area.	Agree
2a. Within or adjoining site of nature conservation importance	+ The site is not within or adjoining a site of nature conservation importance	Agree
2b. In an area where protected species are known or likely to exist?	? Uncertain or insufficient information.	Detailed ecological assessment will be carried out to support a planning application or allocation, however the site is only likely to have limited potential for protected species.
2c. Potentially able to achieve a net gain in biodiversity?	? Uncertain or insufficient information	A detailed net gain assessment could be completed as part of a planning application or to support an allocation.
2d. Able to link into the green infrastructure opportunity network?	No answers chosen.	Yes – Bedford Northern Fringes Opportunity Zone is located approximately 250m to the south. Opportunities to connect to this on foot are provided by the continuous footway on the eastern side of Wilden Road then FP12 between Nos 3 and 4 Brickfield Road.
3a. Proposing a renewable energy scheme or extra energy efficiency standards?	No answers chosen.	The site is put forward for residential development, but an element of renewable energy generation would be

		incorporated.
4a. Likely to impact on designated or non designated heritage assets or their settings?	x The proposal has the potential to cause harm to heritage assets. This harm may range from low to high. There may be options to avoid, reduce or mitigate this harm and where sites have not been ruled out altogether for other reasons, further assessment will be undertaken to more fully explore impacts on significance and options for harm reduction and mitigation. This further assessment may ultimately lead to the conclusion that the site should not be allocated.	Disagree. The site does not affect any heritage assets or their setting. There is no Conservation Area in Salph End and the nearest listed building is the Old Farmhouse at 8 Ravensden Road, some 250 south west of the site.
5a. Likely to increase future economic and employment opportunities?	No answers chosen	n/a
6a. Proposing a main town centre use in, on the edge or outside of a town centre?	No answers chosen.	n/a
8b. Within the existing settlement form?	x The site is separated from a defined settlement policy area or the built form of a small settlement	Disagree – the site sit adjoins the curtilage of other residential properties and sits between the built up areas of Salph End and Church End.
9a. On previously developed land?	x The site is not previously developed land as defined in the NPPF	The southernmost end of the site is occupied by two large sheds/outbuildings, meaning that approximately 10% of the site is brownfield.
9b. On best and most versatile agricultural land ie grades, 1, 2 or 3a?	? The classification of the site is not known or it is not clear whether is classified as grade 3a or 3b.	The site is defined as 'Very Good' according to the DEFRA ALC maps. It is however not in agricultural use.
10a. Within a groundwater source protection zone?	+ The site is not located in a source protection zone.	Agree
11a. At risk of flooding?	No answers chosen.	The site lies entirely within FZ1 and therefore demonstrates a low risk of fluvial flooding.
15e. Connect highway without constraint?	? Potential access requiring mitigation Access proposed to the east of the site on Wilden Road. The site sits along a bend in the road, which is quite narrow and visibility is currently poor. There is moderate congestion in the vicinity at peak	See detailed comments below

	times which the site would contribute to. The closest bus stop is just 200m away on Church End, offering bus line 27, with 1 bus per hour. Wilden road is narrow and has a 1m wide footway on only one side. There are no cycling facilities in the surrounding area. Additional assessment would be required of access suitability given visibility on this section of Wilden Road. Footway widening required outside the site. Shared cycle paths could be implemented along Wilden Rd to the north and/or Church End. Investigate increase in bus frequency, or additional bus lines.	
Contaminated Land	No answers chosen	Greenfield site – unlikely to be any risk of contamination
Environmental Health	no noise concerns	Agreed
Minerals & Waste	No answer given	Not a minerals safeguarding area
Mineral Safeguarding Area	Site does not fall within the boundary of a MSA	Agreed

Highways/Access Clarification

4.2 An updated Access Appraisal has been prepared by DLP's Sustainable Development Team and demonstrates that a safe and suitable access to the site can be achieved for vehicles and pedestrians. In summary;

- There is existing pedestrian infrastructure which, coupled with minor footway improvements at the site access, provide direct connectivity to the nearest bus stops. The nearest bus stops are well within the recommended maximum walking distance.
- There are various destinations, both employment and education, that are located within a reasonable walking or cycling distance of the site with footway connections to these provided via existing infrastructure on Wilden Road.
- Wilden Road is subject to a 30mph speed limit and therefore considered suitable to accommodate a new access for residential purpose. Actual vehicle speeds are lower than the posted 30mph speed limit.
- Recorded vehicle speeds on Wilden Road indicate that the road operates in 'free flow' conditions during the AM and PM peaks.
- A development of 30 units would only generate around one additional vehicle movement during the AM and PM peak hours, this is not considered material and would not have a material negative impact on the free flow operation of Wilden Road.
- A safe and suitable site access with visibility splays in line with local requirements and national guidance could be achieved with minimal highway improvements required to deliver it.

4.3 In conclusion, having notable regard to Paragraphs 110 and 111 of the NPPF, the Access

Appraisal has clearly demonstrated a safe and suitable access arrangement can continue to be provided, that the redevelopment will not unacceptably impact on wider highway safety and that the redevelopment will not lead to a severe impact on the surrounding highway network. It is therefore considered that a residential development of 30/40 dwellings would comply with both national and local transport planning policy and best practice.

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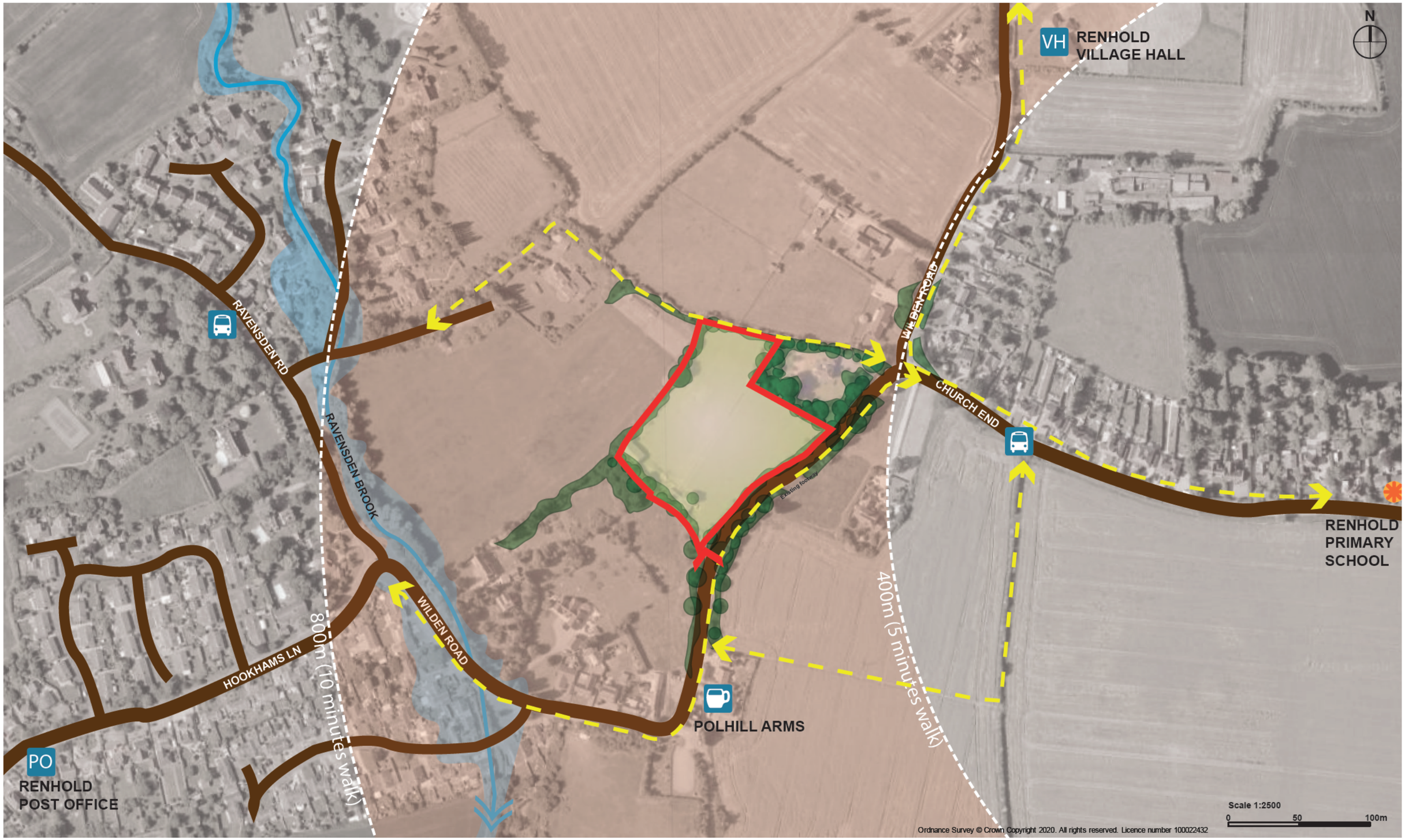
Appendix 1 Land at Wilden Road, Salph End, Renhold - Site Appraisal and Indicative Masterplan (BE1 Architects)

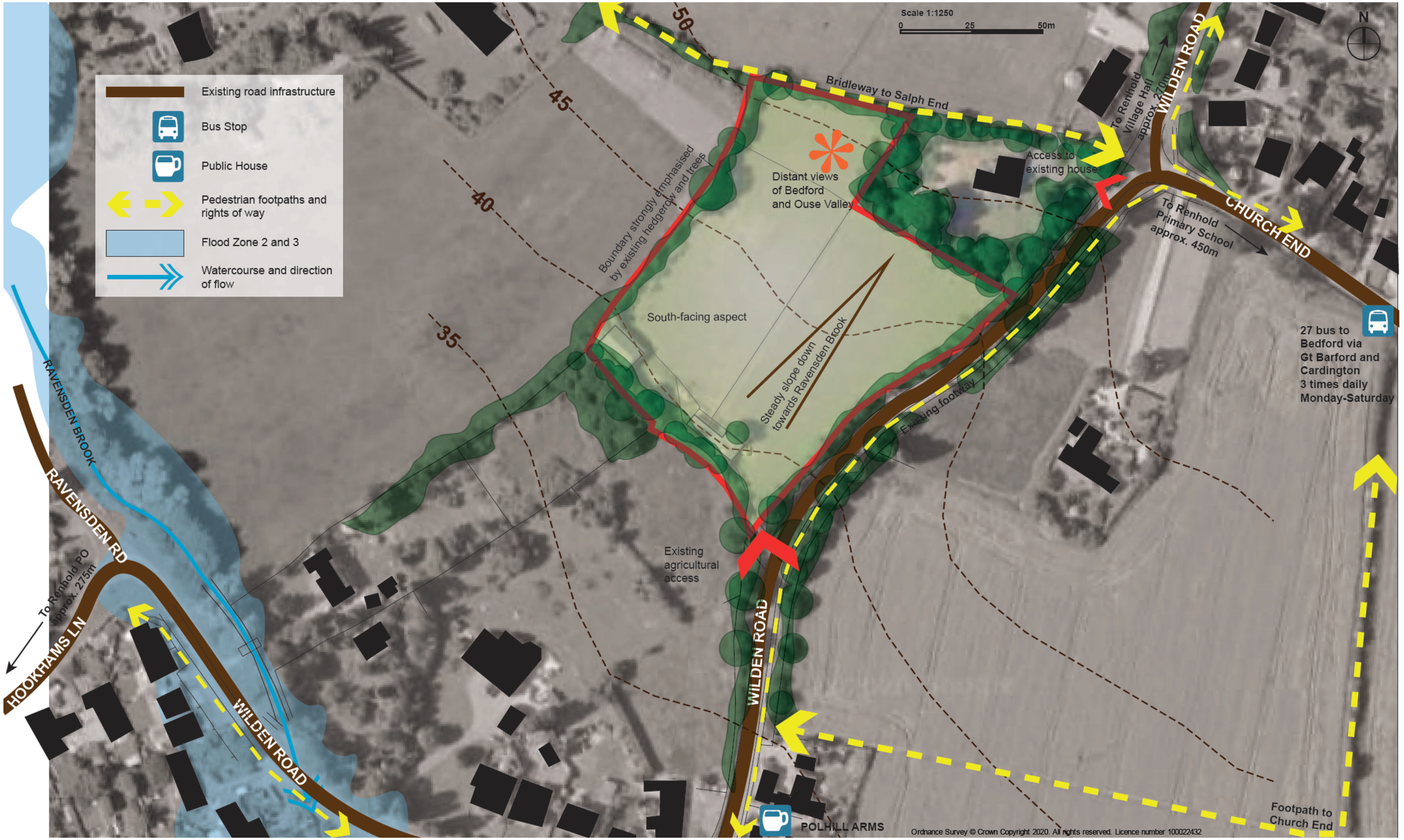
LAND WEST OF WILDEN ROAD, SALPH END RENHOLD

Site Promotion
Site Appraisal

For and on behalf of:

21 July 2020




Scale 1:1250
0
25
50m
N
Existing road infrastructure
Bus Stop
Public House
Pedestrian footpaths and rights of way
Flood Zone 2 and 3
Watercourse and direction of flow
50
45
40
35
Bridleway to Salph End
Boundary strongly emphasised by existing hedgerow and trees
Distant views of Bedford and Ouse Valley
South-facing aspect
Steady slope down towards Ravensden Btook
Existing footway
Access to existing house
To Renhold Village Hall approx. 270m
WILDEN ROAD
To Renhold Primary School approx. 450m
CHURCH END
27 bus to Bedford via Gt Barford and Cardington 3 times daily Monday-Saturday
RAVENSDEN BROOK
RAVENSDEN RD
To Renhold PO approx. 275m
HOOKHAMS LN
WILDEN ROAD
Existing agricultural access
WILDEN ROAD
POLHILL ARMS
Footpath to Church End
Ordnance Survey © Crown Copyright 2020. All rights reserved. Licence number 100022432

Opportunities

- Potential to provide good quality, well-designed homes that respect the village character of Salph End
- Existing pedestrian paths and bridleways provide good connectivity to Salph End and Church End
- Easy walking distance to Renhold Village Hall, Public House and existing public transport links
- Potential to provide family housing within 5mins of Renhold Primary School, reducing term-time congestion
- Long-distance views from the top of the hill towards Bedford and Great Ouse Valley
- Within cycling distance of Bedford town centre and employment opportunities at Elm Farm Estate
- Current use of the site as paddocks for horses limits ecological value across the site
- Contiguous with the village of Salph End
- Obscured from nearby vantage points by mature hedgerows and trees
- Potential to introduce appropriate traffic calming measures to improve traffic flows on Wilden Road, noted anecdotally as a 'rat-run'

Constraints

- Long distance views from Bedford towards Renhold hill
- Strong hedgerow boundaries with potential ecological value
- Distinct sloping topography and relevant impacts on surface water drainage and street design

Top: Local public house and Wilden Road looking northeast
Above: Distant views of Bedford and Ouse Valley villages

Below: Existing site access
Bottom: Bridleway to Salph End looking west

View northeast along Wilden Road towards Church End at the outside of the bend

View southwest along Wilden Road towards Polhill Arms and Salph End taken at the same point as photo to Top Left

Sloping topography

Current site use limits ecological value

Distant views of Bedford and outlying villages

- Northern extent of the site retained as public open space to reduce potential impact on views of the site from surrounding villages
- Potential to connect public open space to existing bridleway and through the site towards the southern end of the village
- Relocation of site access to achieve visibility criteria along Wilden Road
- 30 units achievable at an average density of 45 dwellings per hectare
- Housing mix to include one and two storey houses in a range of types and tenures to suit the needs and character of Salph End village
- Attenuation or infiltration ponds possible at the southern boundary if required
- Subject to detailed design, passive traffic calming such as road narrowing, pinch points or gateway features and 30mph repeater signs could be introduced to discourage 'rat-run' behaviour along Wilden Road

Appendix 2 Site Access Appraisal – September 2021 update (SDD)

SUSTAINABLE DEVELOPMENT AND DELIVERY

A specialist team within DLP Planning Ltd

SITE ACCESS APPRAISAL – SEPTEMBER 2021 UPDATE

Land at Wilden Road, Renhold, Bedford

Prepared by
Sustainable Development and Delivery
DLP Planning Ltd

September 2021

Prepared by:		
Checked by:		
Approved by:		
Date: September 2021	Office: Bristol	Issue: September 2021 Update

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SUSTAINABLE DEVELOPMENT AND DELIVERY

CONTENTS PAGE

1.0 INTRODUCTION

1.1 This Site Access Appraisal Note has been produced in order to review the development potential of land to the west of Wilden Road in Renhold village, Bedfordshire, and provide support in promotion of the site through the Local Plan. **Figure 1** below shows the parcel of land under consideration.

Figure 1: Study Area

1.2 This appraisal has been based upon the site being brought forward for circa 30 to 40 dwellings, with access to be provided directly off Wilden Road.

1.3 An initial version of this Note was provided to Bedford Borough Council (BBC) to inform the Local Plan Call for Sites in 2020. The Note submitted to BBC in 2020 confirmed that the proposed site could deliver an appropriate access junction based on the 30mph speed of Wilden Road from which access would be provided.

1.4 However, the review of the site provided in the BBC Call for Sites Response states for Site 701 (site of interest), it is considered that the *"current access is unsuitable/requires improvement"*. In addition, the BBC comments also note that *"improvements and the relocation of the existing access onto Wilden Road"* would be required. These comments are expanded upon in the 'Site Assessment' section of the BBC response which in terms of Highways states:

"Access proposed to the east of the site on Wilden Road. The site sits along a bend in the road, which is quite narrow and visibility is currently poor. There is moderate congestion in the vicinity at peak times which the site would contribute to. The closest bus stop is just 200m away on Church End, offering bus line 27, with 1 bus per hour. Wilden road is narrow

and has a 1m wide footway on only one side. There are no cycling facilities in the surrounding area. Additional assessment would be required of access suitability given visibility on this section of Wilden Road. Footway widening required outside the site. Shared cycle paths could be implemented along Wilden Rd to the north and/or Church End. Investigate increase in bus frequency, or additional bus lines

1.5 The objective of this updated Note is to provide a rebuttal to the Highways related comments set out in the BBC Call for Sites Response and to confirm that BBC's concerns around the deliverability of an appropriate site access junction, the sustainability of the site and the potential impact on congestion are unfounded.

1.6 This Note takes into account current policy contained within the revised National Planning Policy Framework (NPPF), which was released in July 2021. The report also sets out the access strategy produced in accordance with the geometric requirements set out in Manual for Streets (MfS) 2007, MfS 2 2010 and the BBC Highway Development Control Design Guidance (1995).

2.0 EXISTING CONDITIONS

Site Location

2.1 The site measures approximately 1.16 hectares in area and is bound by Wilden Road to the east, undeveloped fields to the south and west, and a residential property to the north. Further afield, Bedford is located approximately 4km to the southwest of the site.

2.2 The site is currently accessed via a 4m wide access track which ties into Wilden Road with 7.2m wide dropped kerb (see **Figure 2**). An existing access gate is set back approximately 10m from the edge of the carriageway.

Figure 2: Existing Access

Local Highway Network

2.3 Along the site frontage, Wilden Road is a single carriageway subject to a 30mph speed limit, with a dashed centre line and solid white lined edge of carriageway markings. No streetlighting is currently provided. Wilden Road is approximately 5.5m wide in the vicinity of the site. This is appropriate to allow two HGVs to pass and cannot be considered to be *"narrow"* as set out in the BBC Call for Sites Highways response. There is an existing footway which extends along the eastern edge of Wilden Road, whilst the western edge is bound by a verge.

2.4 Approximately 180m to the north of the existing access, at the Wilden Road / Church End junction, the footway continues north along Wilden Road on the eastern edge of the carriageway, and then along the northern edge of Church End. At this junction, an informal crossing is provided in the form of a dropped kerb and tactile paving crossing.

2.5 Notwithstanding the BBC comments on the width of the footway in the vicinity of the site, a desktop review indicates that the existing footway varies in width between 1.4m and 2m to the north and south of the site which is significantly wider than the 1m width stated by BBC. In addition to this, if required, there is available verge to widen any pinch points in the footway between the site and Church Road to the north. As such, it is considered that an appropriate

pedestrian route can be provided between the site and Church End to the north and to the wider pedestrian provision on the north eastern side of Bedford to the south.

2.6 On-site observations confirm that Wilden Road slopes downhill from north to south past the site frontage. Ordnance Survey information confirms that the carriageway gradient level changes by 10m over a distance of 160m, which highlights an approximate gradient of 6%. This information would be confirmed following the completion of a topographical survey.

Vehicle Speeds – ATC Survey Results

2.7 A 7-day Automatic Traffic Counts (ATC) survey was commissioned between Friday 20th and Thursday 26th August 2021 to ascertain vehicle speeds on Wilden Road in the vicinity of the site. The ATC was placed in the location of the existing gated site access junction.

2.8 Full details of this survey are contained within **Appendix A** with a summary of the speeds provided in **Table 2.1.**

Direction	7-Day Average	7-Day 85th Percentile
Northbound	24mph	29mph
Southbound	25mph	29mph

Table 2.1: ATC Results (August 2021)

2.9 The survey data confirms that both 85 h percentile and average vehicle speeds are below the designated 30mph speed limit of the road.

2.10 The 85th percentile speeds recorded by the ATC have (as set out later in this Note) been used to calculate the actual visibility required at the proposed site access junction into the site.

2.11 In terms of *"congestion"* on Wilden Road as cited in the BBC Call for Sites Response, it should be noted that 85th percentile speeds during the AM and PM peak hours are the same or higher as the 7-day averages set out in **Table 2.1** above. This indicates that vehicle movements are still 'free flowing' with no significant queuing or delays even during peak times.

Accessibility

2.12 Table 3.2 of the Institute of Highways and Transportation 'Guidelines for Journeys on Foot' (2000) provides suitable walking distances, with 2000m being a preferred maximum walking distance for commuting and education land uses. **Figure 3** shows a 2000m isochrone, which confirms that areas such as Renhold and parts of Bedford are within a comfortable walking distance of the site, which include employment areas such as Viking Industrial Estate and Elms Farm Industrial Estate. Furthermore, Renhold VC Primary School, Mark Rutherford Upper School & Community College and Putnoe Primary School are also located within 2000m.

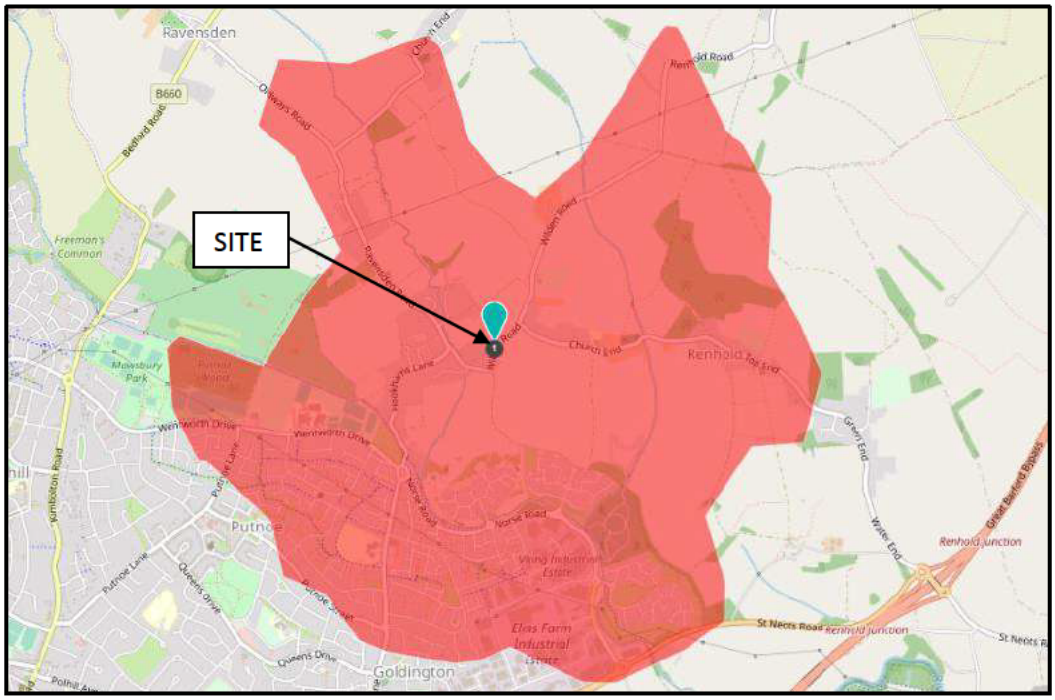


Figure 3: Pedestrian Isochrone (2000m)

2.13 In addition to the proximity of local facilities, it should be noted that a footway route is provided between the site and the local facilities provided to the north and south of the site.

2.14 In the wider area, **Figure 4** shows that there are several Public Rights of Way (PRoW), which lie in the vicinity of the site. Public Bridleway 'RENHOLD 27' is located to the north of the site and extends between Wilden Road and Brook Lane to the east. To the south, Public Footpath 'RENHOLD 12' provides a more direct route into Bedford, extending between Brickfield Road and Hookhams Lane.

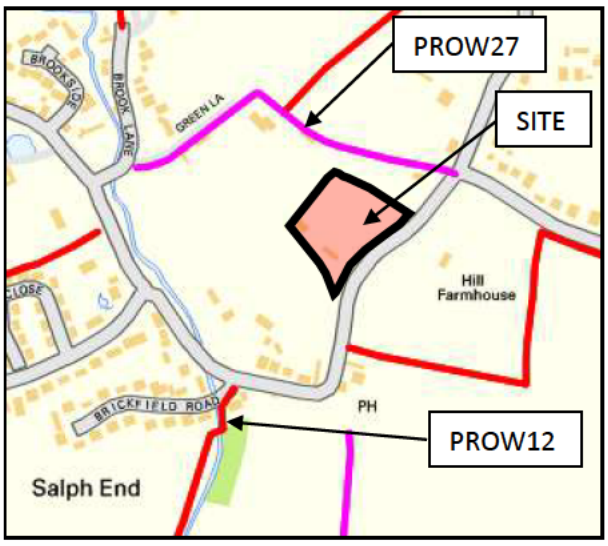


Figure 4: Public Rights of Way

2.15 **Figure 5** is an extract of the Bedford and Kempston Cycling and Walking map which shows that there are various facilities available to the south. These include facilities such as an on-road and off-road cycle lane along Wentworth Drive, as well a recommended on-road cycle

route into Bedford centre. The information provided by the Bedford and Kempston and Cycle map clearly contradicts the BBC Highways statement in the Call for Sites Response which states that *"there are no cycling facilities in the surrounding area"*.

Figure 5: Bedford and Kempston Cycling and Walking Map

2.16 Typically, it is widely accepted that people are prepared to walk up to 400m to the nearest bus stop. The nearest pair of bus stops are located on Church End to the north west, within a 280m walking distance of the site, with on-site photos of the facilities shown within **Figure 6**. These stops are served by Route Number 27, operated by Grant Palmer, which provides a connection to Bedford, Ravensden, Wilden and Renhold at a frequency of one service an hour, Monday to Saturday, with no service provided on a Sunday. These stops can be accessed via the footway that is provided along the eastern edge of Wilden Road and the northern edge of Church End.

Figure 6: Bus Shelter and Stop on Church End

2.17 In line with comments from BBC Highways in the Call for Sites Response, a financial contribution could be secured as part of any planning consent for improvements to existing bus services in the immediate area of the site and in particular, those which operate from the

Church End bus stops which are within appropriate walking distance of the site.

2.18 The above review demonstrates that the site is well served by existing footway infrastructure, which provides access to education, employment, leisure and transport public transport services such that future residents could access key facilities.

3.0 POTENTIAL ACCESS STRATEGY

Potential Traffic Generation

3.1 In order to determine a suitable access strategy to serve the site, it is important to establish the likely level of traffic that could be associated with a residential use on the site.

3.2 At this stage, it is anticipated that the site could be developed to serve up to 30/40 dwellings. A high-level analysis of the TRICS database has been undertaken to determine typical residential trip rates for similar sites. The category 'Residential – Houses Privately Owned' was searched, specifying sites between 20 and 40 dwellings that were surveyed on a weekday, and that were located within an 'Edge of Town' or 'Neighbourhood Centre' areas. Sites located within the Greater London, Ireland, Scotland and Wales regions were deselected.

3.3 The above search produced a total of 14 sites, from which an average trip rate was taken (see data contained at **Appendix B**). The following trip rate per dwelling, and trip generation for up to 30 dwellings were therefore deemed appropriate (see **Table 3.1**) for the proposed use.

Time Period	Arrivals	Departures	Two-Way
08:00 – 09:00 Trip Rate (per dwelling)	0.136	0.324	0.460
08:00 – 09:00 Trip Generation (30 dwelling)	4	10	14
17:00 – 18:00 Trip Rate (per dwelling)	0.299	0.153	0.452
17:00 – 18:00 Trip Generation (30 dwellings)	9	5	14

Table 3.1: Potential Vehicle Trip Generation

3.4 The above has demonstrated that a future development of 30 residential units could generate in the order of 14 two-way vehicle trips during any given peak period. This equates to around one additional vehicle movement every five minutes during development and road network peak hours. If developed for 40 units, this only increases the peak hour trip generation to 18 vehicles.

3.5 Contrary to the comments provided by BBC Highways in the Call for Sites Response, it is not considered that this limited increase in traffic would have any material negative impact on the free-flowing operation of the road. As such, it is concluded that the development would not have a significant or severe impact along Wilden Road or any off-site junction, in accordance with Paragraph 111 of the NPPF.

Proposed Site Access

3.6 The existing access into the sites lies at the southernmost site frontage at Wilden Road and comprises a 4m wide access track, that ties into the carriageway at a 60-degree angle with a dropped kerb. This existing access would not conform to the BBC geometric requirements

to serve a residential development of up to 30/40 dwellings in its current form, and as a result, a new or modified site access would be provided.

3.7 Table 3.1 of Bedford Borough Council Highway Development Control Design Guidance (1995) document provides a design criterion that varies based on the number of dwellings. A 'Minor Access Road' is suitable to serve up to 100 dwellings from a single point of access and would require a 5.5m wide carriageway bound by a 2m wide footway at both edges. The next step below this would be a ''Accessway', which can only serve up to 25 dwellings from a single point of access, and should comprise a carriageway of between 4.1 to 6m wide bound by a 2m wide verge at both edges.

3.8 In light of the above and given that the proposals are to serve up to 30/40 dwellings, **Drawing Number BE5504-2PD-001 Rev A** shown as a snapshot **Figure 7** below and in a scalable form at **Appendix C,** demonstrates how a new 'Minor Access Road' junction could be provided in accordance with local design guidance. The drawing shows that the new access would be located 30m north of the existing access, and would comprise a 5.5m wide carriageway which ties into Wilden Road with 10m kerb radii, bound by a 2m wide footway at both edges. The priority-controlled T-junction would meet Wilden Road at a 90 degree-angle.

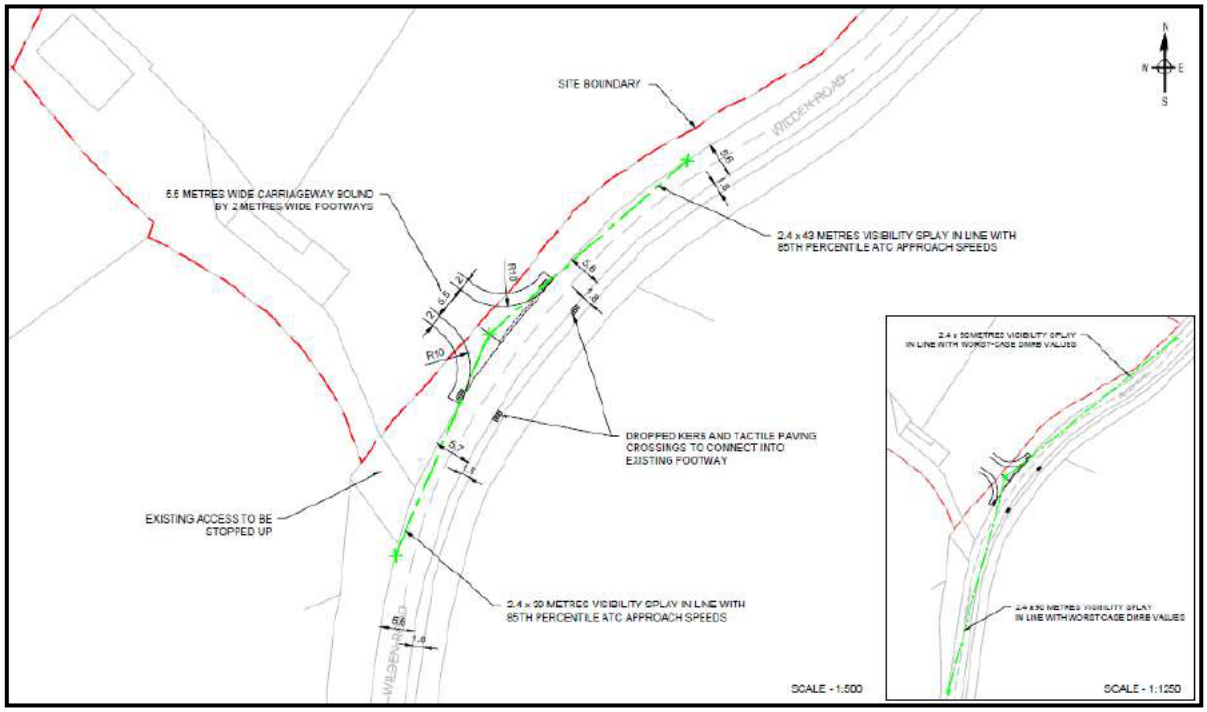


Figure 7: Potential Site Access

3.9 Given the existing pedestrian infrastructure is located at the eastern edge of Wilden Road, it would be recommended that as part of any future planning application, a short footway spur should be provided to the north and south of the proposed site access, with dropped kerb and tactile paving crossings provided in order to connect residents to the existing footway, as shown in **Drawing Number BE5504-2PD-001 Rev A**. Alternatively, dedicated pedestrian access could be provided at the northern and southern edge of the site frontage, as this is

closer to the built-up environment.

3.10 With regard to visibility, Wilden Road is subject to a 30mph speed limit and would typically require 2.4m x 43m visibility splays in accordance with Table 7.1 of MfS. It should be noted that following historic discussions with BBC in relation to other schemes, visibility can be required in accordance with DMRB as opposed to MfS guidance. This would require more onerous 90m splays being required. However, as shown in **Drawing Number BE5504-2PD-001 Rev A**, these more onerous visibility splays could also be achieved from the proposed site access within land that is either controlled by the client or under highway ownership.

3.11 In addition to the compliance with MfS and DMRB standards, 85th percentile vehicle speeds taken from the August 2021 ATC have also been assessed to confirm that visibility commensurate with actual vehicle speeds can be provided.

3.12 The results of the speed survey contained at **Appendix A** and summarised in **Table 2.1,** show that both 85th percentile and average vehicles speeds are below the 30mph speed limit in both north and southbound directions.

3.13 Chapter 10 of MfS2 provides a detailed formula for calculating visibility splays, taking into account the percentage of HGV movements, vehicle speeds and road gradient.

3.14 The speed survey data confirms that visibility splay distances of 43m to the north (for southbound traffic) and of 39m to the south (for northbound traffic) would be required from any site access. This takes in to account the gradient of Wilden Road past the site.

3.15 These visibility requirements are below the 90m that could be required by DMRB guidance and again, are achievable within land owned by the Client or within the extent of adopted highway owned and maintained by BBC.

3.16 Overall, the geometry of the proposed site access is compliant with the standards contained within BBC's adopted design guide for a development of this scale with visibility provided in line with the posted speed limit of the road, DMRB standards and the actual 85th percentile vehicle speeds recorded by the ATC. In light of this, it is considered that the proposed site access would be 'safe and suitable', and therefore is in accordance with Paragraph 110 of the NPPF.

3.17 As set out above, the visibility at the access is compliant with key local and national guidance and as such, cannot be considered to be *'poor'* as set out in the BBC Call for Sites Response.

Servicing

3.18 In terms of refuse collection, Paragraph 6.8.9 of MfS states that:

> *"Schedule 1, Part H of the Building Regulations (2000) defines locations for the storage and collection of waste. The collection point can be on-street or may be at another location defined by the waste authority. Key points in the Approved Document to Part H are:*
>
> *• Residents should not be required to carry waste more than 30 m to the storage*

points; and
• Waste collection vehicles should be able to get within 25m of the storage point…."

3.19 It is likely that any future site masterplan would need to accommodate internal refuse collection and as a result the above maximum drag distances should be adhered to. It should be noted that a 5.5m wide carriageway and 10m radii at the site access junction are appropriate to accommodate a BBC refuse vehicle. A suitable turning head would also be provided within the site.

4.0 KEY CONCLUSIONS

4.1 The key conclusions of this Site Access Appraisal Note are as follows:

- There is existing pedestrian infrastructure which, coupled with minor footway improvements at the site access, provide direct connectivity to the nearest bus stops. The nearest bus stops are well within the recommended maximum walking distance.
- There are various destinations, both employment and education, that are located within a reasonable walking or cycling distance of the site with footway connections to these provided via existing infrastructure on Wilden Road.
- Wilden Road is subject to a 30mph speed limit and therefore considered suitable to accommodate a new access for residential purpose. Actual vehicle speeds are lower than the posted 30mph speed limit.
- Recorded vehicle speeds on Wilden Road indicate that the road operates in 'free flow' conditions during the AM and PM peaks.
- A development of 30 units would only generate around one additional vehicle movement during the AM and PM peak hours, this is not considered material and would not have a material negative impact on the free flow operation of Wilden Road.
- A safe and suitable site access with visibility splays in line with local requirements and national guidance could be achieved with minimal highway improvements required to deliver it.

4.2 In conclusion, having notable regard to Paragraphs 110 and 111 of the NPPF, this Note has clearly demonstrated a safe and suitable access arrangement can continue to be provided, that the redevelopment will not unacceptably impact on wider highway safety and that the redevelopment will not lead to a severe impact on the surrounding highway network. It is therefore considered that a residential development of 30/40 dwelling would comply with both national and local transport planning policy and best practice.

4.3 For the above reasons, it is considered that there are no highways or transport related reasons to object to the use of the site for residential development and is therefore recommended that the site should be allocated for residential use in the BBC emerging Local Plan.

Appendix A ATC Data

Wilden Road, Renhold, Bedfordshire ATC

Site Ref. 555001 **Site No.** 555001

Site 1

Speed Report (Speed Limit 30 Mph) **20 Aug 2021**

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <5Mph	Bin 2 5-<10	Bin 3 10-<15	Bin 4 15-<20
00:00	3		26		0	0	0	0
01:00	3		29		0	0	0	1
02:00	0				0	0	0	0
03:00	2		25		0	0	0	0
04:00	4		26		0	0	0	0
05:00	9		25		0	0	1	0
06:00	26	28	25	3	0	0	0	2
07:00	50	29	25	4	0	0	0	3
08:00	75	29	24	4	0	0	0	7
09:00	80	29	24	5	0	1	1	14
10:00	79	27	22	5	1	2	0	15
11:00	79	29	23	5	2	0	3	12
12:00	82	28	23	5	3	0	0	13
13:00	84	28	23	5	0	1	3	9
14:00	82	28	24	5	0	1	0	11
15:00	93	28	23	5	2	0	2	13
16:00	81	29	25	4	1	0	0	4
17:00	99	29	24	5	0	3	0	8
18:00	54	29	23	5	1	1	1	9
19:00	41	29	24	4	0	0	0	6
20:00	26	26	22	4	0	0	0	7
21:00	17	28	25	3	0	0	0	1
22:00	8		21		0	0	1	3
23:00	6		25		0	0	1	0
Total								
12H(7-19)	938	29	24	5	10	9	10	118
16H(6-22)	1048	29	24	5	10	9	10	134
18H(6-24)	1062	29	24	5	10	9	12	137
24H(0-24)	1083	29	24	5	10	9	13	138
AM Peak	09:00	07:00	01:00	11:00	11:00	10:00	11:00	10:00
	80	29	29	5	2	2	3	15
PM Peak	17:00	16:00	16:00	18:00	12:00	17:00	13:00	15:00
	99	29	25	5	3	3	3	13

Site No. 555001 **Site Ref.** 555001

Site 1

Speed Report (Speed Limit 30 Mph) **20 Aug 2021**

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <5Mph	Bin 2 5-<10	Bin 3 10-<15	Bin 4 15-<20
00:00	2		30		0	0	0	0
01:00	0				0	0	0	0
02:00	4		26		0	0	0	0
03:00	0				0	0	0	0
04:00	0				0	0	0	0
05:00	3		24		0	0	0	1
06:00	13	29	26	3	0	0	0	1
07:00	26	28	25	3	0	0	0	0
08:00	59	28	24	4	0	0	0	7
09:00	78	28	24	4	0	0	1	8
10:00	83	27	23	4	0	0	4	6
11:00	82	28	24	4	0	0	0	5
12:00	86	29	25	4	0	0	0	8
13:00	76	30	26	4	0	0	0	4
14:00	97	29	25	4	0	0	0	7
15:00	88	28	24	5	0	0	0	13
16:00	100	30	25	4	0	0	0	7
17:00	86	29	24	4	0	0	0	8
18:00	40	29	25	4	0	0	1	0
19:00	42	27	24	3	0	0	0	2
20:00	22	28	23	4	0	0	0	6
21:00	14	30	25	5	0	0	0	2
22:00	12	29	26	3	0	0	0	0
23:00	6		25		0	0	0	0
Total								
12H(7-19)	901	29	25	4	0	0	6	73
16H(6-22)	992	29	25	4	0	0	6	84
18H(6-24)	1010	29	25	4	0	0	6	84
24H(0-24)	1019	29	25	4	0	0	6	85
AM Peak	10:00	06:00	00:00	10:00	-	-	10:00	09:00
	83	29	30	4	0	0	4	8
PM Peak	16:00	21:00	22:00	21:00	-	-	18:00	15:00
	100	30	26	5	0	0	1	13

Site No. 555001 **Site Ref.** 555001

Site 1

Speed Report (Speed Limit 30 Mph) **20 Aug 2021**

	Total Volume	85th Percentile	Mean Average	Standard Deviation	Bin 1 <5Mph	Bin 2 5-<10	Bin 3 10-<15	Bin 4 15-<20
00:00	5		28		0	0	0	0
01:00	3		29		0	0	0	1
02:00	4		26		0	0	0	0
03:00	2		25		0	0	0	0
04:00	4		26		0	0	0	0
05:00	12	30	25	5	0	0	1	1
06:00	39	29	25	4	0	0	0	3
07:00	76	29	25	4	0	0	0	3
08:00	134	28	24	4	0	0	0	14
09:00	158	29	24	5	0	1	2	22
10:00	162	27	23	5	1	2	4	21
11:00	161	28	24	5	2	0	3	17
12:00	168	29	24	5	3	0	0	21
13:00	160	29	25	4	0	1	3	13
14:00	179	29	24	4	0	1	0	18
15:00	181	28	24	5	2	0	2	26
16:00	181	30	25	4	1	0	0	11
17:00	185	29	24	5	0	3	0	16
18:00	94	29	24	5	1	1	2	9
19:00	83	28	24	4	0	0	0	8
20:00	48	27	23	4	0	0	0	13
21:00	31	29	25	4	0	0	0	3
22:00	20	29	24	5	0	0	1	3
23:00	12	29	25	4	0	0	1	0
Total								
12H(7-19)	1839	29	24	5	10	9	16	191
16H(6-22)	2040	29	24	5	10	9	16	218
18H(6-24)	2072	29	24	5	10	9	18	221
24H(0-24)	2102	29	24	5	10	9	19	223
AM Peak	10:00	05:00	01:00	05:00	11:00	10:00	10:00	09:00
	162	30	29	5	2	2	4	22
PM Peak	17:00	16:00	16:00	22:00	12:00	17:00	13:00	15:00
	185	30	25	5	3	3	3	26

PCC Traffic Information Consultancy Ltd.

Channel: Northbound

Bin 5 20-<25	Bin 6 25-<30	Bin 7 30-<35	Bin 8 35-<40	Bin 9 40-<45	Bin 10 45-<50	Bin 11 50-<55	Bin 12 55-<60	Bin 13 =>60
2	0	1	0	0	0	0	0	0
0	1	0	0	1	0	0	0	0
0	0	0	0	0	0	0	0	0
1	1	0	0	0	0	0	0	0
2	1	1	0	0	0	0	0	0
3	3	2	0	0	0	0	0	0
15	7	0	2	0	0	0	0	0
27	14	5	1	0	0	0	0	0
42	20	5	1	0	0	0	0	0
30	28	6	0	0	0	0	0	0
43	14	3	1	0	0	0	0	0
29	29	4	0	0	0	0	0	0
38	25	3	0	0	0	0	0	0
43	23	4	1	0	0	0	0	0
40	25	5	0	0	0	0	0	0
43	28	4	1	0	0	0	0	0
36	31	8	1	0	0	0	0	0
48	30	8	2	0	0	0	0	0
18	20	4	0	0	0	0	0	0
19	13	3	0	0	0	0	0	0
13	6	0	0	0	0	0	0	0
10	5	0	1	0	0	0	0	0
3	0	1	0	0	0	0	0	0
2	1	2	0	0	0	0	0	0
437	287	59	8	0	0	0	0	0
494	318	62	11	0	0	0	0	0
499	319	65	11	0	0	0	0	0
507	325	69	11	1	0	0	0	0
10:00	11:00	09:00	06:00	01:00	-	-	-	-
43	29	6	2	1	0	0	0	0
17:00	16:00	17:00	17:00	-	-	-	-	-
48	31	8	2	0	0	0	0	0

Channel: Southbound

Bin 5 20-<25	Bin 6 25-<30	Bin 7 30-<35	Bin 8 35-<40	Bin 9 40-<45	Bin 10 45-<50	Bin 11 50-<55	Bin 12 55-<60	Bin 13 =>60
0	1	1	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0
2	1	1	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0	0
1	0	1	0	0	0	0	0	0
4	6	2	0	0	0	0	0	0
15	9	2	0	0	0	0	0	0
29	22	1	0	0	0	0	0	0
30	39	0	0	0	0	0	0	0
49	22	2	0	0	0	0	0	0
47	27	3	0	0	0	0	0	0
36	36	4	1	0	0	0	0	1
27	37	7	1	0	0	0	0	0
42	40	7	1	0	0	0	0	0
44	25	6	0	0	0	0	0	0
45	36	9	3	0	0	0	0	0
44	28	6	0	0	0	0	0	0
17	20	2	0	0	0	0	0	0
29	10	1	0	0	0	0	0	0
8	7	0	1	0	0	0	0	0
6	3	3	0	0	0	0	0	0
6	4	2	0	0	0	0	0	0
3	3	0	0	0	0	0	0	0
425	341	49	6	0	0	0	0	1
472	367	55	7	0	0	0	0	1
481	374	57	7	0	0	0	0	1
484	376	60	7	0	0	0	0	1
10:00	09:00	11:00	-	-	-	-	-	-
49	39	3	0	0	0	0	0	0
16:00	14:00	16:00	16:00	-	-	-	-	12:00
45	40	9	3	0	0	0	0	1

Channel: Total Flow

Bin 5 20-<25	Bin 6 25-<30	Bin 7 30-<35	Bin 8 35-<40	Bin 9 40-<45	Bin 10 45-<50	Bin 11 50-<55	Bin 12 55-<60	Bin 13 =>60
2	1	2	0	0	0	0	0	0
0	1	0	0	1	0	0	0	0
2	1	1	0	0	0	0	0	0
1	1	0	0	0	0	0	0	0
2	1	1	0	0	0	0	0	0
4	3	3	0	0	0	0	0	0
19	13	2	2	0	0	0	0	0
42	23	7	1	0	0	0	0	0
71	42	6	1	0	0	0	0	0
60	67	6	0	0	0	0	0	0
92	36	5	1	0	0	0	0	0
76	56	7	0	0	0	0	0	0
74	61	7	1	0	0	0	0	1
70	60	11	2	0	0	0	0	0
82	65	12	1	0	0	0	0	0
87	53	10	1	0	0	0	0	0
81	67	17	4	0	0	0	0	0
92	58	14	2	0	0	0	0	0
35	40	6	0	0	0	0	0	0
48	23	4	0	0	0	0	0	0
21	13	0	1	0	0	0	0	0
16	8	3	1	0	0	0	0	0
9	4	3	0	0	0	0	0	0
5	4	2	0	0	0	0	0	0
862	628	108	14	0	0	0	0	1
966	685	117	18	0	0	0	0	1
980	693	122	18	0	0	0	0	1
991	701	129	18	1	0	0	0	1
10:00	09:00	11:00	06:00	01:00	-	-	-	-
92	67	7	2	1	0	0	0	0
17:00	16:00	16:00	16:00	-	-	-	-	12:00
92	67	17	4	0	0	0	0	1

Appendix B TRICS Data

Calculation Reference: AUDIT-631801-200706-0742

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
Category : A - HOUSES PRIVATELY OWNED
VEHICLES

Selected regions and areas:

02	SOUTH EAST		
	HC	HAMPSHIRE	2 days
03	SOUTH WEST		
	DC	DORSET	1 days
	SM	SOMERSET	1 days
04	EAST ANGLIA		
	NF	NORFOLK	1 days
	SF	SUFFOLK	1 days
06	WEST MIDLANDS		
	ST	STAFFORDSHIRE	1 days
	WM	WEST MIDLANDS	1 days
07	YORKSHIRE & NORTH LINCOLNSHIRE		
	NY	NORTH YORKSHIRE	1 days
08	NORTH WEST		
	CH	CHESHIRE	2 days
	GM	GREATER MANCHESTER	1 days
	LC	LANCASHIRE	1 days
09	NORTH		
	TW	TYNE & WEAR	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: No of Dwellings
Actual Range: 23 to 40 (units:)
Range Selected by User: 20 to 40 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:
Selection by: Include all surveys

Date Range: 01/01/12 to 25/09/19

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	4 days
Tuesday	2 days
Wednesday	3 days
Thursday	2 days
Friday	3 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	14 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaking using machines.

Selected Locations:

Edge of Town	10
Neighbourhood Centre (PPS6 Local Centre)	4

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

C3	14 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 1 mile:

1,000 or Less	1 days
1,001 to 5,000	2 days
5,001 to 10,000	2 days
10,001 to 15,000	2 days
15,001 to 20,000	2 days
20,001 to 25,000	2 days
25,001 to 50,000	2 days
50,001 to 100,000	1 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	2 days
25,001 to 50,000	1 days
50,001 to 75,000	2 days
75,001 to 100,000	2 days
125,001 to 250,000	3 days
250,001 to 500,000	3 days
500,001 or More	1 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	4 days
1.1 to 1.5	10 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	4 days
No	10 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	14 days

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1 CH-03-A-09 TERRACED HOUSES CHESHIRE
GREYSTOKE ROAD
MACCLESFIELD
HURDSFIELD
Edge of Town
Residential Zone
Total No of Dwellings: 24
Survey date: MONDAY 24/11/14 Survey Type: MANUAL

2 CH-03-A-10 SEMI-DETACHED & TERRACED CHESHIRE
MEADOW DRIVE
NORTHWICH
BARNTON
Edge of Town
Residential Zone
Total No of Dwellings: 40
Survey date: TUESDAY 04/06/19 Survey Type: MANUAL

3 DC-03-A-08 BUNGALOWS DORSET
HURSTDENE ROAD
BOURNEMOUTH
CASTLE LANE WEST
Edge of Town
Residential Zone
Total No of Dwellings: 28
Survey date: MONDAY 24/03/14 Survey Type: MANUAL

4 GM-03-A-11 TERRACED & SEMI-DETACHED GREATER MANCHESTER
RUSHFORD STREET
MANCHESTER
LEVENSHULME
Neighbourhood Centre (PPS6 Local Centre)
Residential Zone
Total No of Dwellings: 37
Survey date: MONDAY 26/09/16 Survey Type: MANUAL

5 HC-03-A-21 TERRACED & SEMI-DETACHED HAMPSHIRE
PRIESTLEY ROAD
BASINGSTOKE
HOUNDMILLS
Edge of Town
Residential Zone
Total No of Dwellings: 39
Survey date: TUESDAY 13/11/18 Survey Type: MANUAL

6 HC-03-A-22 MIXED HOUSES HAMPSHIRE
BOW LAKE GARDENS
NEAR EASTLEIGH
BISHOPSTOKE
Edge of Town
Residential Zone
Total No of Dwellings: 40
Survey date: WEDNESDAY 31/10/18 Survey Type: MANUAL

7 LC-03-A-31 DETACHED HOUSES LANCASHIRE
GREENSIDE
PRESTON
COTTAM
Edge of Town
Residential Zone
Total No of Dwellings: 32
Survey date: FRIDAY 17/11/17 Survey Type: MANUAL

8 NF-03-A-05 MIXED HOUSES NORFOLK
HEATH DRIVE
HOLT

Edge of Town
Residential Zone
Total No of Dwellings: 40
Survey date: THURSDAY 19/09/19 Survey Type: MANUAL

9 NY-03-A-11 PRIVATE HOUSING NORTH YORKSHIRE
HORSEFAIR
BOROUGHBRIDGE

Edge of Town
Residential Zone
Total No of Dwellings: 23
Survey date: WEDNESDAY 18/09/13 Survey Type: MANUAL

LIST OF SITES relevant to selection parameters (Cont.)

10	SF-03-A-06 DETACHED & SEMI-DETACHED		SUFFOLK
	BURY ROAD		
	KENTFORD		
	Neighbourhood Centre (PPS6 Local Centre)		
	Village		
	Total No of Dwellings:	38	
	Survey date: FRIDAY	*22/09/17*	*Survey Type: MANUAL*
11	SM-03-A-01 DETACHED & SEMI		SOMERSET
	WEMBDON ROAD		
	BRIDGWATER		
	NORTHFIELD		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	33	
	Survey date: THURSDAY	*24/09/15*	*Survey Type: MANUAL*
12	ST-03-A-08 DETACHED HOUSES		STAFFORDSHIRE
	SILKMORE CRESCENT		
	STAFFORD		
	MEADOWCROFT PARK		
	Edge of Town		
	Residential Zone		
	Total No of Dwellings:	26	
	Survey date: WEDNESDAY	*22/11/17*	*Survey Type: MANUAL*
13	TW-03-A-03 MIXED HOUSES		TYNE & WEAR
	STATION ROAD		
	NEAR NEWCASTLE		
	BACKWORTH		
	Neighbourhood Centre (PPS6 Local Centre)		
	Village		
	Total No of Dwellings:	33	
	Survey date: FRIDAY	*13/11/15*	*Survey Type: MANUAL*
14	WM-03-A-04 TERRACED HOUSES		WEST MIDLANDS
	OSBORNE ROAD		
	COVENTRY		
	EARLSDON		
	Neighbourhood Centre (PPS6 Local Centre)		
	Residential Zone		
	Total No of Dwellings:	39	
	Survey date: MONDAY	*21/11/16*	*Survey Type: MANUAL*

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
VEHICLES
Calculation factor: 1 DWELLS
Estimated TRIP rate value per 30 DWELLS shown in shaded columns
BOLD print indicates peak (busiest) period

	ARRIVALS				DEPARTURES				TOTALS			
Time Range	No. Days	Ave. DWELLS	Trip Rate	Estimated Trip Rate	No. Days	Ave. DWELLS	Trip Rate	Estimated Trip Rate	No. Days	Ave. DWELLS	Trip Rate	Estimated Trip Rate
00:00 - 01:00												
01:00 - 02:00												
02:00 - 03:00												
03:00 - 04:00												
04:00 - 05:00												
05:00 - 06:00												
06:00 - 07:00												
07:00 - 08:00	14	34	0.083	2.479	14	34	0.282	8.453	14	34	0.365	10.932
08:00 - 09:00	14	34	0.136	4.068	14	34	0.324	9.725	14	34	0.460	13.793
09:00 - 10:00	14	34	0.155	4.640	14	34	0.197	5.911	14	34	0.352	10.551
10:00 - 11:00	14	34	0.146	4.386	14	34	0.159	4.767	14	34	0.305	9.153
11:00 - 12:00	14	34	0.161	4.831	14	34	0.201	6.038	14	34	0.362	10.869
12:00 - 13:00	14	34	0.155	4.640	14	34	0.174	5.212	14	34	0.329	9.852
13:00 - 14:00	14	34	0.172	5.148	14	34	0.159	4.767	14	34	0.331	9.915
14:00 - 15:00	14	34	0.178	5.339	14	34	0.182	5.466	14	34	0.360	10.805
15:00 - 16:00	14	34	0.250	7.500	14	34	0.210	6.292	14	34	0.460	13.792
16:00 - 17:00	14	34	0.256	7.691	14	34	0.138	4.131	14	34	0.394	11.822
17:00 - 18:00	14	34	0.299	8.962	14	34	0.153	4.576	14	34	0.452	13.538
18:00 - 19:00	14	34	0.216	6.483	14	34	0.091	2.733	14	34	0.307	9.216
19:00 - 20:00												
20:00 - 21:00												
21:00 - 22:00												
22:00 - 23:00												
23:00 - 24:00												
Total Rates:			2.207	66.167			2.270	68.071			4.477	134.238

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

Parameter summary

Trip rate parameter range selected:	23 - 40 (units:)
Survey date date range:	01/01/12 - 25/09/19
Number of weekdays (Monday-Friday):	14
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Appendix C Proposed Site Access **Drawing Number BE5504-2PD-001-Rev A**

SITE BOUNDARY

WILDEN ROAD

5.5 METRES WIDE CARRIAGEWAY BOUND
BY 2 METRES WIDE FOOTWAYS

2.4 x 43 METRES VISIBILITY SPLAY IN LINE WITH
85TH PERCENTILE ATC APPROACH SPEEDS

5.6
1.8
2
5.5
2
R10
R10
5.6
1.8

DROPPED KERB AND TACTILE PAVING
CROSSINGS TO CONNECT INTO
EXISTING FOOTWAY

5.7
1.5

EXISTING ACCESS TO BE
STOPPED UP

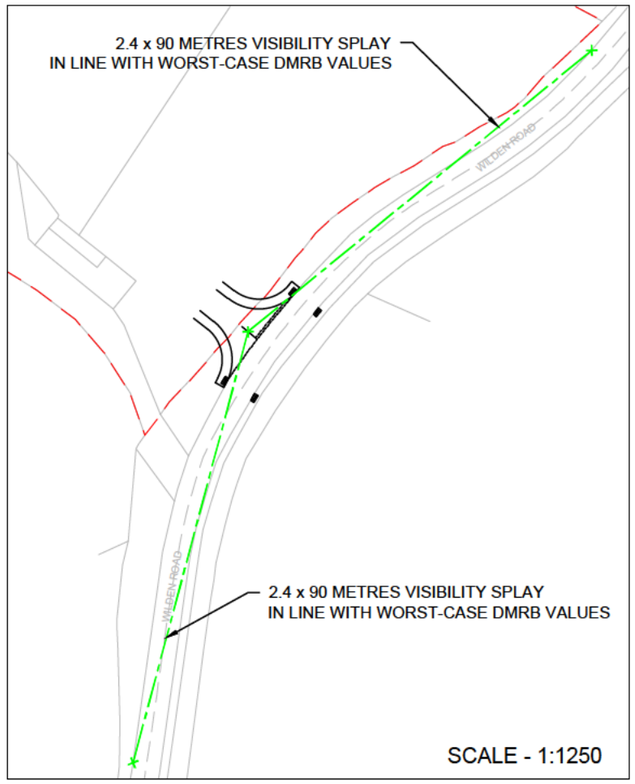
2.4 x 39 METRES VISIBILITY SPLAY IN LINE WITH
85TH PERCENTILE ATC APPROACH SPEEDS

5.6
1.8

WILDEN ROAD

SCALE - 1:500

N
W
E
S



SCALE - 1:1250

REV		DR	CH	AP	DATE
A	UPDATED TO REFLECT SPEED SURVEY RESULTS	KH	JN	JN	31.08.21

CAD FILE NAME : BE5504-2PD-001

PROJECT
LAND AT WILDEN ROAD, RENHOLD

CLIENT

DRAWING TITLE
PROPOSED SITE ACCESS ARRANGEMENT

DRAWN BY	CHECKED BY	APPROVED BY	DATE	SCALES @ A3 SIZE	ISSUE STATUS
KH	AM	DB	01.07.20	AS SHOWN	PLANNING

DRAWING NUMBER
BE5504-2PD-001

REV.
A

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RICS™

RTPI Chartered Town Planner

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