

## NOTE

**Re:** G5116-1PS Beford Local Plan 2040 Pre-Submission Consultation

**Date:** 22 December 2022 **Author:** Megan Wilson

**Subject:** Submission for Examination in Public

### Introduction and Overview

Following completion of the consultation on the completion of the Regulation 19 version of the Local Plan 2040, and further to receipt of 10,539 individual representations, Officers will ask the Council's Executive to recommend to Full Council that the emerging Local Plan is submitted for Examination in Public.

The Council's Executive is set to meet on the 4<sup>th</sup> January where the Local Plan is amongst other issues on the agenda. Full Council follows a week later on 11<sup>th</sup> January.

We have reviewed the report produced for the Executive along with the updated evidence of the Local Plan and have considered against the key objections and issues relevant to you land interest, including the stepped trajectory, primary education infrastructure, Oakley and Little Barford.

A number of new and updated technical and supporting reports have been published by the Council. These are outlined in the table below;

*New documents and supporting documents that have changed since Regulation 19 publication		
	Document title	Reason for change
12	Historic Environment Topic Paper	To add additional Heritage Impact Assessment information (new section 8.1 and Appendix 3)
15	Infrastructure Delivery Plan	To add a section on emergency ambulance service requirements and to update the education section with latest information
26	Stepped Trajectory Topic Paper	To incorporate latest trajectory information following 2021 / 22 monitoring
30	Sustainability Report Addendum	To clarify the approach taken in respect of planning for Gypsies and Travellers and Travelling Show People.
33	Habitats Regulations Assessment of the Local Plan 2040	To reflect discussions with and recommendations from Natural England
49	Duty to Co-operate Compliance Statement	To reflect ongoing duty to cooperate activity during and beyond the Regulation 19 consultation stage
50	Statement of Consultation	Updated with details of the Regulation 19 consultation stage
52	NEW Local Plan 2040 Policies Map	A required submission document
53	NEW Suggested Modifications to the Plan for Submission	A table of suggested modifications supported by the Council for discussion during the examination hearing sessions

### Duty to Cooperate

As set out in the previous update note, numerous objections suggest that the approach taken to the Duty to Cooperate has been insufficient and ineffectual and that the Council's statements need to be more specific regarding involvement. Concerns are also expressed over the fact that not all of

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the plan's details were disclosed to Duty to Cooperate partners prior to the Regulation 19 consultation.

The Duty to Cooperate Statement sets out the statutory bodies that were consulted at Regulation 19 consultation and those that provided a response. The Council's response, as confirmed in the report to Executive is simply that they have included sufficient capacity within the spatial strategy to address any issues associated with Luton's unmet housing need. (para 5.60).

Significantly, as confirmed through the table above, the submission Plan will not be supported by updated Statements of Common Ground with Central Bedfordshire Council or Milton Keynes Council.

Given the representations received from Highways England and Historic England at the regulation 19 consultation stage and having reviewed the submission Plan and supporting evidence, there is likely to be reasonable pressure placed on the Council through the Examination with regard to the need for ongoing discussions re infrastructure funding and the impact of the new proposed new settlements on heritage assets in the locality.

### Stepped Trajectory

Noting consultation responses in regard to the application of a stepped trajectory, the report to Executive notes, some consultees were of the view that the stepped trajectory that is proposed in the plan has not been justified and that a five-year land supply will not be achieved. It is thought that because the stepped trajectory doesn't fully deliver the Standard Method number in early plan years, it will create a delay in the construction of desperately needed dwellings. Others believe that the delivery rates shown in the stepped trajectory are exaggerated, particularly later on in the plan period when the new settlements start to operate. To meet the required delivery rates, it is advised that a larger number of smaller locations be allotted in the plan. Some people support a stepped trajectory in theory, but they believe that more homes should be given earlier in the plan period.

Within the proposed submission version of the Local Plan, the Council continue to advocate a stepped trajectory approach on the basis that the Standard Method requires a 40% increase in the Borough's housing delivery rate. They consider that this is a very significant change in the level of housing required when compared to the recently adopted Local Plan 2030.

As is detailed in the Stepped Trajectory Topic Paper at para 4.2 and the Statement of Consultation, the increased housing figures are however not the only reason why the Council that the trajectory needs to be stepped. Once again according to the Council, the local plan strategy will result in an urban focus and rail-based expansion that calls for the delivery of major strategic sites, which will happen later in the plan period due to the timeline for building necessary infrastructure and the lengthier lead times for such sites.

The Statement of Consultation (page 11) also notes the significance of a reliance on adopted Neighbourhood Plan and is clear in stating that applying a flat requirement over the Plan period would necessitate the urgent update and review of multiple Neighbourhood Plans – which is considered unviable.

The evidentiary base for the plan explores a number of the council's considerations that are relevant to the timeframe of delivery. The most important finding is that, up to 2030, the development rate should stay at or slightly exceed the levels of the 2030 plan. The delivery rate might then significantly

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rise starting in 2030, assuming major infrastructural investment will be made in the borough and that a stronger economy will lead to higher housing market demand.

The rate of 970 houses each year is maintained through 2025 and represents the perception that time must be given for the recently established plan's sites to materialise, particularly the programme of sites resulting from recently created neighbourhood plans. As the smaller sites allotted in the amended plan also become online, these will increase supply rates between 2035 and 2030. Delivery rates may increase by 2030, helped by the completion of significant infrastructure projects that open up strategic locations and encourage investment while bringing about a sea change in the housing market.

For the purpose of submission the assessment of sites with planning permission, the windfall allowance and the contributions expected from sites in adopted Local Plans and made Neighbourhood Plans has been updated to a base date of 31/3/2022.

Recognising a factual error in the Regulation 19 version of the Plan, MOD12 proposes a change to the wording of policy DS3(S). Amend the dwelling figure for 2025/26 -2029/30 in the policy to read "5250" to correct a factual error.

### Education

The updated Infrastructure Delivery Plan considers in detail Secondary Education. The update confirms that BBC data for 2022 indicates an existing surplus capacity of 1,186 secondary school places based on a pupil list size of 12,513 and a capacity of 13,699 secondary school places, although this capacity is spatially variable. Based on BBC student yield assumptions (and without regard to any potential baseline deficit or surplus of places) potential developments within Bedford borough up to 2040 will create demand for approximately 6,000 new secondary school places. This implies a requirement of five new 8 form of entry (FE) secondary schools.

No proposed modifications have been identified in respect of education provision or capacity.

### Little Barford

Within the Statement of Consultation concerns raised by objectors in respect of the relationship between the proposed new settlements and wider infrastructure requirements has been listed as a key issue.

In summary the principle objection (page 6 of the Executive Report) was that the proposed settlement doesn't relate well to Bedford, the impact on sensitive landscape setting, development/planning should wait until EWR more certain before progressing the plan, concerns about the transport model, need to show that development can happen without EWR in case it doesn't happen/ Further the potential impact on St Neots (facilities and infrastructure), along with the historic environment impact, and the need to work closely with nearby authorities

In response to queries about the relationship, the Council state (page 11) Little Barford and Kempston Hardwick, the two principle new villages, offer a chance to fully reap the rewards of their convenient locations. In order to make walking and cycling the preferred modes of transportation, the new settlement south of Bedford can be planned with the help of two new rail stations: Little Barford, at the intersection of the East West Rail and the East Coast Main Line, and Stewartby

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Hardwick, which will serve the new settlement. Both of these stations have excellent sustainability credentials. Responses to the consultation mostly backed the idea of new communities over more dispersed patterns of growth.

As is set out in the proposed Main Modifications, a number of suggested amendments to Policy HOU19 are proposed under reference MOD34. These are;

*"Paragraph 4.95 Little Barford.*

*Agree that Huntingdonshire District Council should be identified in the supporting text as a key stakeholder.*

*Amend paragraph 4.95 to:*

*"The site has unique locational strengths and qualities which, if properly realised and guided by appropriate design principles, will enable it to be an exemplar for low carbon living and innovation. This will be ensured by the preparation of a strategic masterplan and design code, in partnership with landowners, stakeholders (including Huntingdonshire District Council) and the local community which will be adopted as SPD. It is expected that work to inform the SPD (including any technical studies that are required) will be funded by the landowner / developer."*

*Policy HOU19 Little Barford New Settlement. Amend first bullet point of paragraph 3 as follows: "A Natural Capital impact assessment and biodiversity study with appropriate mitigation and enhancements, including any impact on Portholme SAC".*

*Amend third bullet point of paragraph 3 as follows:*

*"A transport and movement strategy including infrastructure needs and relationship with surrounding areas (including St Neots) and the relationship to East West Rail".*

*Amend fourth and fifth bullet points of paragraph three as follows: "A phasing strategy to ensure that infrastructure investment is provided in tandem with or ahead of the development it supports with review points to monitor the progress of delivery; An infrastructure delivery plan produced in agreement with stakeholders, developers and infrastructure providers setting out the timing, funding, and provision of green, social, and physical infrastructure, including schools, community facilities and local centres in tandem with housing development".*

*Paragraph 4.93 Little Barford.*

*Amend 4.93 as follows:*

*"The new settlement is located to the north east of Bedford, close to the neighbouring town of St Neots. The East Coast Main Line railway line runs north to south through the site and the proposed A428 Black Cat to Caxton Gibbet relief road runs through the site providing an opportunity for a strategic road junction. In addition, EWR will be crossing in the vicinity, possibly through the site, and will include a station offering the opportunity of a highly sustainable site accessible by rail and the strategic road network. In addition to the allocation site there is further land within the same ownership which is identified as a contingency areas, should land be required to facilitate the EWR route and / or station, or other infrastructure as necessary. within the site. In those circumstances the eastern contingency area will be used to provide additional housing and associated facilities, including landscaping, to compensate for land taken by EWR and other infrastructure and the western area (flood plain) for open space and landscaping. The allocation site and contingency land are illustrated by the plan below."*

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### Other Modifications

In direct response to concerns having been raised by Natural England, fairly significant modifications and additional requirements are set out in respect of Policy DM7. The principle change to note is the inclusion of the below;

*“Development on greenfield sites within 20km of the Eversden and Wimpole Woods SAC must be accompanied by a suite of bat surveys to identify any hedgerows, treelines, watercourses or other features that could be used by bats (including but not limited to barbastelle bats). If any such features are present and are found to be used by bats, these features must be retained within the development design and protected from disturbance and lighting impacts.”*

Further clarification is proposed in the policy text relating to affordable housing and specifically affordable rent (DMS(1)).

A number of other modifications and updates are proposed, however these are largely site specific in respect of the housing allocations.

In terms of timeframes moving forward, little additional information is provided in the published information, however, if there are no significant delays the Council expect that the plan examination will conclude in autumn 2023 and if found to be sound, adoption of the plan by the Council will follow (report to Executive para 5.68).