

27th September 2020

To whom it may concern

RE: Bedford Borough Issues and Options Consultation 2020

Hegsons Design Consultancy Ltd are instructed to represent the Parish Councils of Bletsoe, Carlton and Chellington, Clapham, Dean and Shelton, Felmersham and Radwell, Harrold, Knotting and Souldrop, Milton Ernest, Odell, Podington, Stevington, Thurleigh, Pavenham and Wymington in relation to the recent consultation.

Set out below are the questions and answers in relation to the consultation.

Question 1

Do you agree with the proposed scope of the local plan review? If you think that other areas of existing policy should be updated or new policy areas added to the list, please explain what they are and your reasons for wanting them to be included in the plan

We acknowledge the need for an early review of Local Plan 2030 following the Inspectors recommendation, however, there are a number of matters still awaiting resolution which could have a significant impact on the level of growth required in the Borough, for example, how the growth associated with the Oxford to Cambridge Arc is to be distributed along with the current consultation and review of the standard methodology to resolve the housing requirement via the Planning for the future white paper. There is great concern that these unresolved-matters could have a significant impact on the direction of the new Local Plan and, in particular, on the housing figures required for the new period.

At the time of this consultation, the preferred route for East - West Rail will be from Bedford Midland station travelling eastwards through Ravensden towards Tempsford and onto St Neots. This proposal does not include a new station in the Borough of Bedford. Therefore, there is no support for urban growth in North Beds as there is no current or proposed road or rail infrastructure available and this would mean that traffic to Bedford, Kettering, Northampton and Milton Keynes would be along the A6 or along rural roads which are narrow and inadequate to accommodate any increase in traffic. Those routes are already used as a rat run for both domestic and large commercial vehicles, damaging the rural road surfaces and in some cases undermining the foundations of the stone cottages close to the road.

More policies should be developed that relate specifically to the rural area, which forms a very large part of the Borough, as these policies are vague and very much open to interpretation.

Question 2

Do you have any comments on the draft vision? If you think that it can be improved, please tell us how

We believe that there is a need to specifically refer to and protect the Borough's main asset, the River Great Ouse and the Great Ouse Valley, in the vision given it traverses the landscape creating beautiful landscape views and is a haven for wildlife, particularly given climate change challenges and solutions are likely to be centred around the river.

There is also no mention of improved road infrastructure in the north of the Borough which at the moment is served only by the A6. This is a totally inadequate road and cannot cope with the amount of development currently envisaged in the north of the Borough. In addition, little consideration has been given to the

safety and environmental impacts on the communities that live astride the A6. This is particularly important for Milton Ernest. It is essential that traffic generation is not thought of solely in terms of road capacity and convenience for road users - the needs of residents must be given at least an equal priority. There is also current or proposed rail infrastructure available for the area so this would mean that car-based commuter options are the only viable option for the area. The villages in the north of the Borough already suffer from 'rat-running' by drivers either travelling into Bedford town for access schools/station or to reach main arterial road networks leading to other areas. The A6 already cannot cope with the amount of traffic travelling into Bedford or on to the Great Ouse Way. We could not support the development of any of the large developments proposed in the document along the A6 corridor.

Question 3

In line with Government policy, the shortest plan period would be 2020 to 2040. Do you agree with this plan period? If you think the plan period should be longer, what plan end-date would you suggest and why?-

Agree with plan period 2020- 2040. The longer the plan period is, the more challenging it can be for communities to respond to social, economic and environmental changes. The fact that local plans need to be reviewed at least five years in accordance with the National Planning Policy, reinforces that the shortest plan period is preferable.

Question 4

Having considered the potential locations for growth illustrated above, and the pros and cons in Table 1, which one(s) if any do you support? It may be that the local plan strategy will need to combine elements from more than one of the locations to achieve the scale of growth required. Can you suggest other locations?

The Parish Councils consider that a combination of Brown (Urban- Bedford Town and St Neots/Wyoboston/Wixams only), Yellow (A421 based growth) and Pink (rail) focused growth would provide the optimal solution for both protecting the character and landscape of the open countryside particularly the Great Ouse Valley and utilizing existing sustainable transport networks to places of work and leisure.

There is no support for urban growth in North Beds near Rushden as there is no current or proposed road or rail infrastructure available and this would mean that traffic to Bedford, Kettering, Northampton and Milton Keynes would be along the A6 or along rural roads which are narrow and inadequate to accommodate any increase in traffic and are already used as a rat run for both domestic and large commercial vehicles, damaging the rural road surfaces and in some cases undermining the foundations of the stone cottages close to the road.

East Northants is also planning a minimum of 2,700 homes as part of the Rushden sustainable urban extension in the east of the Town, alongside the A6/John Clarke Way over the next 15 years as well as further housing at Rushden Lakes as part of that development. Due to its proximity to Northants, any considerable development proposed in Northants that's will "border" any significant house builds in Bedfordshire cannot be examined in isolation. Any proposed expansion on either side of the county borders and the expansion to Rushden will substantially impact on traffic on the A6, without any further urban development at Wymington.

We consider the combination of Brown (Urban- Town Centre and St Neots/Wyoboston/Wixams), Yellow (A421 based growth) and Pink (rail) would offer a number of advantages most of which are set out in the option appraisal - support for services, facilities and businesses in urban areas, particularly Bedford town centre; greatest potential for residents to make sustainable travel choices (walking, cycling and public transport); increasing development density improves public transport viability; best use of brownfield and

under-used land; reduces need for development in open countryside; more employment uses within centre will improve viability and create direct benefits of other associated business uses such as retail and leisure; ease of access to employment areas with good connectivity is important; high-tech employment development in balanced communities with the option to live and work locally; Increased employment opportunities in the urban area and sustainable methods of transport for those residents in most deprived areas. There appears to be a lack of sites proposed in the south of Bedford with only new growth proposed at Wixams which sits within two Local Authority boundaries. It is particularly surprising not to see an option for more development at the former Stewartby Brickworks site (which is brownfield land) as it is capable of delivering a significant number of homes and potentially a new settlement.

Orange (East-West rail northern station growth)

At the time of this consultation, the preferred route for East - West Rail will be from Bedford Midland station travelling eastwards through Ravensden towards Tempsford and onto St Neots. This proposal does not include a new station in the Borough of Bedford with any new growth along this corridor having to travel either into Bedford to the existing station or to the proposed new station in the St Neots/Tempsford area. There is no support for urban growth in North Beds as there is no current or proposed road infrastructure available, in the absence of a rail station and connection, so this would mean that all traffic to Bedford, Kettering, Northampton, Milton Keynes and Cambridge would be along the A6 or along rural roads which are narrow and inadequate to accommodate any increase in traffic, which are already used as a rat run for both domestic and commercial vehicles.

For this reason, this growth option does not provide any real benefits and will cause significant harmful visual and landscape impacts on the surrounding rural area and use valuable agricultural land.

- Grey (Dispersed growth)

During the current Local Plan period (2020-2030), many of the villages are either required or choosing through neighbourhood plans to deliver significant housing growth. For example, the Key Service Centres of Sharnbrook and Great Barford will see a 50% increase in the number of households where as Clapham and Bromham will see the number of households increase by 25%. In general terms, the growth in all rural areas over the next 10 years will be considerable. Much of the housing growth in the rural area is generally located on greenfield land which not only results in the loss of important agricultural land but also results in harmful visual and landscape impacts in the open countryside and its associated settlements. Also, a dispersed growth option is unlikely to create sustainable economic growth perpetuating car reliant modes of travel.

- Red (New settlement-based growth)

The New Settlement based growth is opposed (apart from at Wyboston) for the following reasons -

The long lead times meaning that homes and associated development take a number of years to complete often beyond the plan period;

Significant investment is needed early on to prepare and plan the location and to create the necessary infrastructure for a new settlement. The need for this 'upfront' investment takes time. Excellent public transport is essential to the success of a new settlement and this proves often difficult to deliver due to investment requirements and the multiple public transport providers involved;

New settlements sometimes involve complicated land assembly which is critical to providing appropriate supporting infrastructure in a timely manner;

Recent Inspector's letters relating to proposed new settlement allocations in local plans Tendring, Colchester, Braintree (15th May 2020), Uttlesford (10th January 2020) and the Inspector's report for Hart (10th February 2020) identified a number of issues that needed careful consideration –

The high-level delivery assumptions are often biased and play down risks;

There is greater potential for stalled or undeliverable housing;

Housing development is more likely to be watered down in terms of quality and principles post allocation due to under estimated infrastructure and other costs. The Borough should not allow developers to return to previously agreed permissions to allow them to reduce commitments made in their initial s.106 agreements through viability studies (which are generally confidential and not made available to the public) to provide fewer benefits for the community than agreed when the initial permission was granted.;

The potential need for greater public sector investment post site allocation to compensate for biased assumptions which would be poor value for money compared with other growth options put forward in the pre-allocation process.

The Borough Council should not therefore under-estimate the requirement to carefully and sensibly demonstrate that there is reasonable prospect that a new settlement proposal can be delivered. Without robust but proportionate evidence on delivery, infrastructure and viability that objectively tests the positive and negative impacts and takes account of any consequences new settlements should not be supported. In any event, if, as it is anticipated, the number of additional dwellings needed is low (see 'Other comments' at the end of this response in relation to the calculation of housing growth), then a new settlement would not be the optimal way to deliver additional housing growth.

Question 5

Infrastructure needs building in from the start to ensure new development is suitably accessible and supported. What infrastructure do you consider is key to the delivery of growth in Bedford Borough?

Infrastructure shapes our lives – it is the foundation upon which our economy is built. It vital that we are determined to deliver better infrastructure to grow the economy and improve opportunities for people across the country.

Transport links get us where we need to be, energy systems power our homes and businesses, digital networks allow us to communicate and infrastructure supplies us with clean water / takes away our waste. It is vital to improving our quality of life and integral to the creation of vibrant new places to live and work. Suitable and appropriate infrastructure provisions have taken on an ever-increasing importance in the light of recent global COVID-19 Pandemic

Depending on the growth location (see Question 4 and answer), appropriate transport and service infrastructure will be needed including new roads, dedicated and safer pedestrian and cycle routes, providing assistance for vulnerable road users, EV charging facilities, sustainable drainage systems, schools, doctors and dentist premises, convenience shopping facilities, sports and recreation facilities and community facilities. Suitable and appropriate employment uses commensurate with the scale of the growth option would be desirable.

Question 6

More employment sites will need to be allocated alongside housing growth. Where do you think new employment sites can be located in Bedford borough?

In line with the current policy approach, new employment sites should be located primarily on brownfield land in or next to the main urban area as these are closest to existing Borough population and as they are better linked to the existing primary transport network and hubs.

In all cases, consideration should be given to the strategic location of site in relation to accessibility for sustainable modes of travel in order to reduce peak periods traffic congestion and pollution. By minimising delays on the Strategic Road Network, through effective demand management and transport planning measures, economic growth will prosper along with delivery of better environmental outcomes.

Industrial employment sites should be considered in close proximity to the strategic road network (e.g. A421, A428 A1, M1 etc) and should not be located in rural communities accessed by the rural road network which could encourage further 'rat-running' of larger vehicles along country roads and through villages.

Question 7

Connectivity to other economic centres, including Oxford and Cambridge, will improve with East-West Rail. How do we capture the benefits of this greater connectivity to these economic centres, to improve and increase the value of the economy of Bedford?

Bedford should establish itself as the "green" market town with the emphasis on residents' quality of life, promoting all forms of sustainable transport to create a modern and sustainable environment that people would aspire to live and work in.

The natural characteristics (e.g. pedestrian and cycle ways along the river) of the town centre need to be nurtured and enhance to improve and increase the economic value of the town. The town of Bedford should become a network of quality open green spaces and green corridors linking pedestrian and cycle ways with the river area. It should define and build on its strengths – recognising and publicising the beautiful countryside around it, not building a railway line on an unwanted route through tranquil open countryside.

If Bedford wishes to benefit from East-West Rail and the improved connectivity to Oxford and Cambridge it should abandon its mistaken preference for the "northern" Rail Route and instead go for the Route B along the A421 transport corridor with a "parkway" station at Wixams. This would discourage traffic from the centre of town interested only in accessing Bedford station, reduce air pollution and improve the quality of life of residents on all access routes.

In addition, the enhancement of parking facilities at outlying rail station should be viewed as a realistic option to be investigated to encourage a high level of 'park and rail' commuters.

The enhancement of the park and ride offering for the town would help to alleviate traffic congestion into and out of the town centre, in particular, to the north of the town (e.g. A6 Clapham). The development of and provision of an efficient and cost-effective service would reduce traffic demand along the critical junctions in the town centre. The inclusion of dedicated 'park and cycle' facilities at the same location should be investigated in order to encourage modal shift along the busy commuter route.

The Issues and Options consultation referred to the former airship hangars located in in the parish of Cardington which are now used by the broadcasting and film industries. The Local Plan should look for opportunities to promote these and other small specialist (high tech, science and technology) businesses to

locate within the Borough. Ideal locations for such industries could be Colworth Park and Thurleigh Airfield which are ideally placed due to their existing activities and availability of brown field land

The south of the Borough is strategically placed for nationwide coverage for the national logistics industry, with good access to a working population, and a very good road network in the A421/M1, A1 and with proposed upgrades to the latter and A428. The Local Plan should support and enhance this sector with a key objective to ensure that residents of Bedford Borough both work and reside within the Borough and that it does not become a large commuter dormitory.

Question 8

Do you have any further views to add to those listed in the Town Centre Plan (see Consultation Responses above)?

The Development Plan has an important role to play in protecting and enhancing the town centre. This should be achieved by devising policies which support existing businesses, provide opportunities for new businesses to locate, promoting sustainable modes of transport, improving car parking in the correct locations. Due to changes in retailing habits by consumers and the proximity of modern shopping facilities at Milton Keynes and Rushden Lakes, it is essential that the traditional shopping areas provide the opportunity to accommodate a broader range of complimentary non-traditional retail uses. In addition to being flexible, new policies should give greater emphasis to enhancing the towns existing physical and cultural features and history, particularly the Embankment, the riverside, Castle Ward, the parks and theatres to enhance the town's appeal not only as a place to live and work but also as a destination for visitors.

The provision of efficient and cost-effective sustainable travel options is critical to the future of the town centre.

Question 9

Do you agree that the Council should produce further guidance for developers on how to respond to climate change? If so, what should be included in it?

The Council's Supplementary Planning Document "Climate Change and Pollution" previously guided developers on issues relating to climate change. However, this is no longer part of the development plan. Given the urgency of climate change the Council should prioritise new guidance to focus developers on addressing this issue at the inception stage of development.

Question 10

The Government is developing new house-building standards to be implemented through building regulations. Is there any local evidence or need to go beyond national standards?

There is no known local evidence to demonstrate that there is a need to go beyond the national standards although it would be desirable.

Question 11

What do you think would encourage people in Bedford borough to make greater use of sustainable modes of transport?

In order to achieve more sustainable development, the current principle of developing additional primary road networks to facilitate new development needs to be reviewed and altered in favour of environmentally sustainable alternatives.

An emphasis needs to be placed on the provision and availability of easy and affordable public transport, and sustainable transport alternatives – encouraging good quality connections and sustainable transport hubs. An integrated network of segregated cycle routes in both urban and rural areas needs to become the norm encouraging people of all ages and abilities to feel safe and use their bicycles more regularly.

Transport hierarchy needs to be adhered to in relation to providing for sustainable modes of travel – this has been even more evident in the 2020 – 2030 plan during the global COVID-19 Pandemic. A shift in urban street layout and practices to prioritise walking, cycling and public transport, needs to be given rather than to the private car.



Easy access to electric cars, charging points and car clubs – as a mean to reduce Single Vehicle Occupancy (SOV) trips needs to be adapted around the county.

The provision of local infrastructure (e.g. shopping facilities, sporting/recreational facilities, community centres etc) need to be available locally in order to reducing the need for residents to use the car to access them – a culture of the “20-minute neighbourhood” is required.

The “20-minute neighbourhood” is all about ‘living locally’ – giving people the ability to meet most of their everyday needs within a 20-minute walk, cycle or local public transport trip of their home.

In essence, a requirement to undertake the following is necessary;

- Make sustainable modes of transport safe and easily accessible – removing physical barriers (e.g. crossing of the A421, widening access route to and from the town centre e.g. Bromham Bridge);
- Substantially increasing the frequency of bus services to communities, in particular rural communities;
- Actively reducing the priority given to unsustainable forms of transport.
- Reversing past unsustainable transport policies and actions

Question 12

If you think that our existing planning policies to protect and enhance the natural environment fail to cover important national or local issues, please give details.

The represented Parish Councils are particularly concerned that growth which will come forward as part of the 2030 Local Plan is located on high quality agricultural land. Whilst it is acknowledged that The National Policy Framework (paragraph 170) and Local Plan (policy 46S) identifies the need to continue to protect and enhancing agricultural land, they feel that policies should give greater emphasis to both the development of brownfield land and the protection of high quality agricultural land to redress this current imbalance and trend.

Question 13

Is there anything else that is addressed in the new Government guidance that is not adequately covered by existing policies?

No other issues to be addressed.

Do you have any other comments to add?

The key issue for all the rural areas represented is the amount of housing growth to be delivered and where. Central to this is both the ONS data and the formula used. In preparation of the 2030 local plan, ONS data from 2014 and the Standard Method of Calculation (SMC) were used to calculate housing growth giving a housing need of 1300 per annum. As stated in the Issues and Options consultation, using the latest 2018 ONS data gives a much-reduced figure for housing need of circa 800 dwellings per year. It is understood that the Borough Council have recently been working with a third-party demographic company and have come up with a figure of circa 1100 units per annum. With the SMC now under review in the recent consultation 'Changes to the current planning system - Consultation on changes to planning policy and regulations' by the Ministry of Housing, Communities and Local Government dated August 2020, it seems that in all likelihood that the formula for calculating housing need will change again. What is clear is that using the ONS 2014 data and the current SMC there gives is a significantly higher housing need compared to the other data figures and other formulae. In all probability, the final housing need figure will be lower than that used for the 2030 local plan if, as it should, the 2018 ONS data is used. As set out in other sections of this response, if the vision genuinely seeks to recognise the *intrinsic character and beauty including areas of tranquil retreat* in the Borough then it is essential that the most up-to-date ONS data and method is used to identify accurate housing needs thereby protecting the rural areas from unnecessary and harmful development on greenfield sites in the rural area.

Yours sincerely

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