



BEDFORD BOROUGH COUNCIL



Borough Charter granted in 1166

Chief Executive: Laura Church

Mr D McCreery
Planning Inspector
The Planning Inspectorate

Sent by email

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Date: 8 December 2023
Ref: Bedford Borough Local Plan 2040

Dear Mr McCreery

Bedford Borough Local Plan 2040 - Post hearings advice

Thank you for your letter dated 27 November 2023 providing advice in relation to the Local Plan 2040.

The Council has now had the chance to consider the soundness issues that are identified, and the purpose of this letter is to provide an initial response and to suggest a way forward.

We are naturally disappointed that the examination is not yet ready to move on to modifications. However, we are grateful for the detailed explanations on the two main issues that are identified in the letter. We have also noted that the letter relates only to points of fundamental soundness and does not seek to address every issue relating to the Plan that may in due course be subject to main modifications.

It is reassuring to learn of your conclusion that the Council's approach of setting the housing requirement in the plan to achieve the need figure generated by the standard method is a sound one; and that it is not appropriate to plan for a higher housing need figure in an attempt to predict additional housing growth linked to corridor-related investment. Also, that subject to the deficit arising from Policy EMP8 being addressed, (discussed in detail in the hearing session), the Council's approach in terms of establishing the overall employment need over the plan period is sound.

Building on those findings, the Council is keen to progress the additional work needed in order to address the matters of concern; principally the delivery of strategic infrastructure improvements to the A421 and the shortfall in housing delivery, and to demonstrate that there is a reasonable prospect that the plan's proposals can be developed within appropriate timescales.

With reference to Paragraph 58 of your letter, in the hearings the Council explained that there was no strategy option available to it that avoided impact on the A421. In addition, the evidence shows that other options involving additional growth north of Bedford would be unacceptable owing to their impact on the already seriously congested A6. This position was uncontested by those attending the hearings and no evidence has been presented by any party to counter this conclusion, or to describe any alternative, sustainable strategy that could deliver the scale of growth

required. A strategy that relied on the local road network to service strategic growth when Bedford Borough is so well positioned in relation to the strategic road network (A421, A1 and M1) and existing / proposed rail infrastructure would not be an acceptable or sustainable option. This remains the Council's position and the measures we intend to propose will support the LP2040 strategy as currently described.

On the first of the soundness issues, the Council's Mayor and Chief Executive are meeting shortly with National Highways in order to secure their commitment to working with us to deliver the required outputs in an acceptable timeframe.

We intend to work with National Highways on the scope of and timetable for the additional work that you have requested. Once that timetable has been prepared, we will forward it to you for your consideration, mindful of the need to keep any delay in the examination of the plan to a minimum.

The Council is firstly seeking validation from National Highways of a newly created VISSIM traffic model so that locations of concern along the A421 can be considered in greater detail and more quickly than National Highways suggested might be possible in ED59.

The agreement with NH will include:

- Validation of the VISSIM model.
- Agreement of feasible options to test.
- Testing of options for each allocation site.
- Costing of best options for each junction.
- Agreement on funding options for these options.

One outcome of this work might be that we ask you to consider the most up to date Standard Methodology figures, should the additional highway modelling work show this to be necessary.

In relation to the second soundness issue, we note the comments about the delivery of housing at the two new settlement sites and your conclusion on the merits of the Abbey Field allocation. In light of these, we will look at delivery rates in more detail to determine the scale of the shortfall. There are options for how the shortfall can be resolved and we will look to identify appropriate additional sites to meet standard method-based OAN in full. Once additional sites have been assessed, the impact on the housing delivery trajectory can also be considered. In terms of timing, the work to identify additional housing sites is already progressing in-house.

Yours sincerely

Gill Cowie
Manager for Planning and Housing Strategy