



The Planning Inspectorate

Gill Cowie

Manager for Planning and Housing
Strategy

Bedford Borough Council
Via email

Our Ref:

PINS/K0235/429/2

Date:

27 November 2023

Dear Ms Cowie,

Post hearings advice: examination of the Bedford Local Plan 2040 (the Plan)

1. As indicated in my closing remarks at the final session of the block 2 hearings on 21 September, I am writing to set out further advice in relation to the Bedford Local Plan 2040 (the Plan). Firstly, I would like to repeat the thanks I gave to the officers involved in the hearings who represented the Council ably. I would also like to thank other participants for giving their time and viewpoints.
2. Paragraph 46 of my Guidance Notes [[ED11A](#)] sets out the next steps following conclusion of the programmed hearings, namely a decision by me about whether the examination is able to progress to the main modifications stage. This follows the advice in the Inspectorate's [Procedure Guide for Local Plan Examinations](#), which remains a good source of general guidance about the examination process.
3. For the reasons set out below, my conclusion at this point is that unfortunately the examination is not in a place where we are able to move on to the main modifications stage. This is because I have concerns that raise fundamental soundness issues that are incapable in the present circumstances of being resolved by identifiable main modifications. I will set out the reasons for my concerns that, whilst I am sure comes as a disappointment, I trust are useful in assisting the Council with considering a way forward.
4. As it relates only to points of fundamental soundness, the advice does not attempt to address every issue relating to the Plan that may, in due course, be subject to main modification.

5. To explain my reasons as clearly as possible, I have drawn on parts of the evidence base. However, in reaching a view I have considered all the evidence and representations made about the Plan, including the verbal contributions at the hearings. I have also considered further written statements received on highway infrastructure arising from my invitation to comment on related examination documents between 2 and 23 October.
6. What follows is an analysis of the soundness position in relation to housing and employment figures, to confirm the overall strategic growth levels that the Plan is seeking to achieve. I go on to discuss the position regarding strategic infrastructure and housing land supply, which is at the heart of my fundamental concerns, along with implications for the soundness of the Plan.

Overall housing need/requirement figures

7. The Bedford Borough Local Housing Needs Assessment (with addendum) [D5] establishes that, on submission of the Plan for examination in January 2023, the relevant inputs under the standard method produced a local housing need figure of 1355 dwellings per annum (totalling 27100 dwellings over the plan period 2020 to 2040).
8. I am satisfied that the figure has been correctly calculated using the right inputs and is in accordance with national Planning Practice Guidance (PPG). The calculation can be relied upon for two years from the date of plan submission. The Council have not asked for the figure to be recalculated using present inputs, although I note their view that the figure resulting would be lower than that produced at plan submission.
9. The growth opportunities associated with Bedford's position within the Oxford to Cambridge corridor (the Corridor) and linked strategic infrastructure improvements bring with it uncertainty about how demographic and market trends will be affected. It is difficult to test the Council's assumption that strategic infrastructure improvements will not in themselves drive further demand for an increase in the homes needed locally. Based on the available evidence, I accept that it is not appropriate to plan for a higher housing need figure than the standard method indicates in an attempt to predict additional housing growth linked to Corridor related investment.
10. As such, 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. Demonstration of housing land supply to meet the requirement using the stepped trajectory set out in Policy DS3(S) of the Plan is a matter of fundamental concern for the reasons I go on to set out. A number of the allocations aimed at meeting the overall housing requirement are also affected by the concerns set out below, either directly or indirectly.

11. In addition, the proposed allocation at Policy HOU5 (Abbey Field, West of Elstow) would result in less than substantial harm to the setting of Elstow Parish Church and Parish Church Tower (both Grade I Listed), to Elstow Manor House (Remains of) Scheduled Monument and to the Elstow Conservation Area.
12. I do not agree with the Council and land promotor's view that the degree of harm sits at the lower end of less than substantial [ED55]. The effects of built development, even only concentrated in the south west corner of the site, along with the likely necessary place making interventions to achieve sustainable development would result in harm to setting at the higher end of less than substantial. This is due principally to the importance of the farmed landscape to the setting of these assets. The public benefits of the allocation are noted, including housing delivery and enhanced public access to the land. When the harm is weighed against the public benefits in accordance with paragraph 202 of the NPPF, I conclude that the proposed allocation would be inconsistent with national policy, and therefore unsound. Modification to remove the allocation would therefore be needed to achieve soundness. Fuller reasoning would be set out in my final report.

Overall employment growth figures

13. There is proportionate and up-to-date evidence¹ of a need for between 118 and 142 hectares of employment land. Although some of the underlying methodology has been questioned by other parties, and I respect differences in professional opinion and judgment, there is no material weakness in the Council's approach. Policy 72(S) of the Local Plan 2030 provides a useful flexibility and potential source of supply should allocated sites not progress as expected. The role of Policy 72(S) could be usefully amplified by signposting it within the Plan. This could be the subject of main modifications.
14. The Economic Growth Ambitions Topic Paper [C1] provides sound justification for the Plan's approach to capitalising on Bedford's position within the Corridor and helping to encourage a high value and skilled economy. The allocations in the plan aimed at provision of innovation and research and development space will assist with encouraging delivery of these aspirations. The allocations retain an appropriate level of flexibility to respond to the uncertainties that are inherent in predicting the effects of growth arising from Corridor and other economic investment.
15. Notwithstanding the Council's view that historic employment growth in Bedford has been too reliant on B8 uses (notably warehouse and logistics), there is an indication within the evidence base that demand will remain, including at a sub-regional level in the SEMLEP Logistics Study [C8]. As submitted, the Plan allocates a total of 35.7 ha for such uses, with further flexibility within other allocations and, again, within Policy 72(S) of the Local Plan 2030. In principle, taken as a whole, the Plan as submitted makes appropriate provision for the delivery of B8 space.

¹ Including Bedford Employment Land Study [C1] (including baseline data update requested in Hearing Session Action 6 [ED57] Growth Ambitions Topic Paper [C3] AECOM report [ED13]

16. However, in terms of specific allocations to meet B8 need, the East West Rail route announcement in May 2023 [ED26 and ED26A] casts considerable doubt over whether the 17ha warehousing and distribution allocation in Policy EMP8 (Land at Roxton, south west of the Black Cat roundabout) is developable to its full extent. This is a matter that the Council were proactive in recognising in the run up to the Matter 6 Hearing Session. As such, notwithstanding the general flexibility in the development plan discussed above, further employment land allocations should be identified for warehousing and distribution uses to make up for the deficit and ensure certainty of supply.
17. The Council have provisionally identified a new site for additional warehousing and distribution in their Additional Employment Site Paper [ED57A]. If proposed to be taken forward, this site would first need to be subject to consultation, consideration of whether other parts of the evidence base need updating to reflect the change, and comment from interested parties.
18. Subject to the deficit arising from Policy EMP8 being addressed, the Council's approach in terms establishing overall employment need over the plan period is a sound one.

Spatial strategy

19. The spatial strategy assumes completion of sites in the existing development plan (including through neighbourhood plans). The Plan in front of me for examination then allocates additional development within the urban area, and at strategic locations adjacent to it, much of which is said to be capable of starting earlier in the plan period (prior to 2030) and deliver throughout.
20. Significant additional development would then be focused on locations along the A421 transport corridor to the south and east of Bedford town (including new settlements at Kempston Hardwick and Little Barford and collective growth within the south of Bedford policy area identified in Policy HOU12). Much of this development relies individually and collectively on strategic infrastructure improvements. Therefore, the anticipated timeframes result in the bulk of delivery not occurring until after 2030. The stepped trajectory in Policy DS3(S) articulates this land supply timing and reflects the Council's assumption that higher levels of housing growth in locations that can be made sustainable in accordance with the chosen spatial strategy is only possible with accompanying improvements to strategic infrastructure.
21. Because of the above, the soundness of the approach in the Plan is fundamentally linked to the deliverability of strategic infrastructure and the reasonableness of the assumptions on alignment with anticipated growth, which in a housing context inform the Updated Local Plan Housing Trajectory [ED40].

Strategic infrastructure

22. The Project Schedule at Appendix C of the Bedford Infrastructure Delivery Plan [E13] is a comprehensive and up to date snapshot of the main infrastructure required to meet the needs arising from the Plan's identified growth. It includes reasonable overall cost estimates and assumptions around who is responsible for delivery. Table 5.2 of the Infrastructure Delivery Plan: The Need for Stepped Trajectory [E14] gives a strategic level view of the relationship between key pieces of transport infrastructure and the larger sites that the Plan seeks to allocate. Although inevitably a matter of professional judgment, the dependency assumptions that Table 5.2 makes are reasonable. Action 22 [ED57] considers the need for an update to Table 5.2 and finds that to be unnecessary. There is no compelling reason for me to take a different view.
23. The Council has identified East West Rail, the A428 Black Cat to Caxton Gibbet road link, and the new Wixams Station as being the main pieces of strategic infrastructure that are of such significance to the spatial strategy that non-delivery of any one would seriously undermine the strategy. This reflects the perceived locational advantage that concentrating growth along the A421 corridor is seen to have in terms of using strategic infrastructure improvements to promote sustainable patterns of development and mitigate transport impacts.
24. Paying regard to the evidence contained in [E13] and [E14], including the dependencies at Table 5.2, I am of the view that the widening of the A421 should be viewed in a similar light. A significant amount of growth identified in the Plan is reliant on this project, with it directly supporting four of the large sites identified in [E14] and indirectly supporting four other large sites. This equates to circa 11930 of the homes allocated in the Plan and approximately 5200 jobs. In these circumstances it is hard to see how the spatial strategy could be delivered without this project.
25. I am in agreement with the statement at paragraph 5.12 [E14] that, for the largest housing development sites and, in the absence of site specific modelling of transport impacts, it is highly unlikely that they could progress without key transport mitigation schemes being in place prior to or during early phases of development. Whilst some work has taken place to explore earlier delivery of schemes (for example at Little Barford) this can only be viewed as preliminary considering the acknowledged need for further work.
26. When considering the fundamental pieces of strategic infrastructure², over the course of the Hearing sessions we made a distinction between non-delivery (i.e. cancelled or just doesn't happen) and delayed delivery (i.e. not delivered within the assumed timeframe). Overall, I am satisfied that proportionate evidence exists to demonstrate that the risk of non-delivery of fundamental strategic infrastructure is within tolerable limits for Plan making purposes.

² East West Rail, the A428 Black Cat to Caxton Gibbet road link, the new Wixams Station, and A421 widening

27. In relation to delayed delivery, I recognise that the timeframes and complexity of large strategic developments are such that this inherently impacts on the certainty of the anticipated timeframes. The PPG³ also recognises this, highlighting specifically that there may not be certainty and/or the funding secured for necessary strategic infrastructure at the time the plan is produced. In such circumstances the question is whether the Council have demonstrated that there is a reasonable prospect that the proposals can be developed within the timescales envisaged. I have approached this issue with this guiding principle in mind.
28. In respect of East West Rail, the A428 Black Cat to Caxton Gibbet road link, and the new Wixams Station, I am satisfied that proportionate evidence for plan making purposes exists about the timings and sources of funding. I appreciate the stage that East West Rail is at in the consenting process and that the specifics of how it would proceed on the ground is not entirely clear. However, the Government's commitment to the project is compelling evidence that supports delivery.
29. The A421 widening project is identified in the Project Schedule at Appendix C [E13] as being proposed for inclusion in the Government's Road Improvement Scheme programme (RIS3), alongside other road projects, with an assumption of being open by 2030. The funding for the widening project, with an assumed cost of £60 million, is identified as coming from a mix of National Highways (i.e. central Government) and developer funding.
30. Although I appreciate that it was submitted late in the hearing session programme, the National Highways Position Statement [ED59] is important evidence when considering the deliverability of the A421 widening project, along with the 12 other road projects where National Highways is identified as a source of funding, that collectively supports a considerable amount of the growth in the Plan.
31. The Position Statement is clear that only the A428 Black Cat to Caxton Gibbet is subject to a committed source of National Highways funding. The remaining projects, along with the A421 widening, are not subject to the same commitment or highlighted for inclusion within RIS3.
32. The absence of funding for these projects at this time is not on its own sufficient to conclude that there is not a reasonable prospect of delivery within the timeframes envisaged. However, the further work identified by National Highways as being needed to move towards funding the projects points towards infrastructure that is not sufficiently advanced in terms of considering its feasibility and prospects of technical delivery.

³ Paragraph: 059 Reference ID: 61-059-20190315

33. Given the land supply assumptions supporting the Plan, this is particularly relevant for the National Highways funded projects in Appendix 3 of [E13] (other than the A428 Black Cat) where 2030 is identified as a delivery date. A stronger indication of inclusion within RIS3 would be necessary for that to be at all achievable which is, at present, absent. This leads me towards a conclusion that the assumptions are not realistic as the funding and commitment to build the infrastructure on which the Plan relies do not have a reasonable prospect of coming forward within the timescales envisaged.
34. The extent of developer funding to help fill the financial gap and effects on viability are not clearly evidenced. However, as the Council acknowledges, the cost of improvements is likely to be in excess of any contributions from specific allocations within the Plan.
35. Nor is there consistency and clarity in the evidence base that allows me to take a view on margins of sensitivity, for example identifying where phasing of some infrastructure or local projects may allow for an element of development (subject to their being a firm commitment that additional infrastructure will be there when it is needed). How much growth could be delivered in the absence of any National Highways funded projects (beyond the A428 Black Cat) is also not explored in the evidence, although my working assumption is that very little could happen in light of the reliance the Plan places on the infrastructure.
36. The Council have pointed to their work [E2] which shows that improvements along the A421 corridor and surrounds will be necessary in the run up to 2040 to deal with existing levels of traffic growth and Local Plan 2030 growth, with or without the development identified in the Plan. They have also highlighted ongoing work and studies with National Highways and neighbouring authorities in this area, which other parties also reference.
37. This activity lends support to the view that the identified road projects could be delivered at some point within the plan period to address known problems. Even if this point is accepted, there would remain a lack of clarity about whether the projects would be delivered to a timescale that would be aligned with the growth proposed in the Plan.
38. I have some sympathy with the Council's point that, in principle, the work exploring the feasibility of the National Highways projects could be accelerated or prioritised. However, that would require a commitment from all parties (including National Highways) that isn't currently evidenced in a strong and consistent enough way to support the Council's assumptions. I must base my conclusions on the evidence I have in front of me.
39. In principle, requiring detailed mitigation to come forward as part of master planning in response to the Plan's policies is capable of being a sound approach. I do not support the National Highways position that agreeing local plan allocations in the absence of finer levels of detail makes it difficult to resist proposals that subsequently prove incapable of mitigation.

40. That position is not consistent with the overall plan led approach in the NPPF, nor the continuing requirement that paragraph 110 has in relation to specific applications for development ensuring that any significant impacts on the transport network (in terms of capacity and congestion) can be cost effectively mitigated to an acceptable degree.
41. However, there is not presently the level of certainty in the evidence base to conclude that the main pieces of necessary highway mitigation will be there when needed, even in principle. Therefore, it is also not possible to conclude on whether the highways mitigation as a whole would be effective and any wider effects, including avoiding significant impacts beyond the borough boundary. As such, the Plan does not provide sound groundwork for detailed transport solutions to then be built upon under the proposed policies at the development management/detailed master planning stage.
42. For the reasons set out, I am unable to draw a conclusion that the highway mitigation that the Plan relies upon has a reasonable prospect of being delivered within the timescale envisaged to support the growth in the Plan. This creates both a timing issue and a significant funding gap and therefore brings into question whether the affected allocation sites are developable and, given the scale of the issue, whether the spatial strategy is justified and effective.
43. I have noted the comments that various parties make about whether the position in relation to National Highways indicates a failure on the Council's part to comply with the Duty to Cooperate. Although this issue raises questions about the soundness of the Plan, I am not of the view that it also follows that the Duty has not been complied with. Fuller reasoning in relation to the Duty would be set out in my final report.

Housing land supply

44. The Updated Local Plan Housing Trajectory [ED40] sets out the anticipated timing and rates of delivery, in line with the stepped trajectory in Policy DS3(S). The rates for the proposed new settlements at Little Barford and Kempston Hardwick attracted considerable discussion over the course of the hearing sessions. Both sites are assumed within the trajectory to start delivering homes in 2030 and then at a yearly rate rising to 600 dwellings per year that would be sustained for the final three years of the plan period to 2040. Each site is assumed to contribute 3800 dwellings to land supply over this period.
45. The Lichfield's Start to Finish Report [ED75] provides some helpful analysis and general trends on build out rates. By its own admission, it does not claim to be definitive or a replacement for local or site level justification. Indeed, looking at the projects contained in the report there is significant variation, highlighting the difficulties in making comparisons across different locations.
46. In terms of local evidence of past trends, the experience at Wixams offers a possible comparable. The completion figures for the development are included at Action 51 [ED74] and indicate peak delivery for a single year at 486 and average build out rates between 2009/10 and 2021/22 at around 177 dwellings.

47. The figures do not provide particular support for the Council's delivery assumptions in relation to the new settlements in the Plan, either when looked at from the perspective of peak delivery or average build out. This includes whether simultaneous peak delivery at 600 dwellings per annum for both sites over a sustained period of 3 years towards the end of the Plan period is achievable.
48. I appreciate that Wixams had its own delivery challenges. Those were specific to that site and, given the inherent complexity of delivering large sites, Little Barford and Kempston Hardwick are likely to have their own specific obstacles (some of which may not presently be capable of identification). This only supports the view that a cautious approach to considering assumed delivery is necessary.
49. The Statements of Common Ground with the site promoters of the respective sites [ED21 in respect of Little Barford and ED31 and ED56 for Kempston Hardwick] signal a wish to progress the allocations at pace, whilst acknowledging the need for contingent infrastructure. There is a difference of view from the Council in some instances on how much development could come forward ahead of infrastructure being provided. As set out above, the Council is right to take a precautionary approach to this issue considering the need for further technical work. Nevertheless, the statements from the site promoters and the Council's proactive attitude towards discussions enhances the evidence of developability.
50. However, this does not in itself provide justification for the Council's assumed build out rates for the sites. Indeed, for Little Barford, in the response to Action 25 [ED57], the Council indicates that they have taken a cautious approach to when delivery on site could start. However, there is a mismatch illustrated in the table below paragraph 8.7 between the housing delivery under the two site promotor scenarios and the Council's trajectory, where rates of delivery for the first 10 years are noticeably higher and peak delivery is above the site promoters position.
51. The Little Barford site promotor's Viability Report at Appendix 1 of their Matter 6 Hearing Statement also considers the Start to Finish Report [ED75] and makes what are valid points about the specific site circumstances at Little Barford. It then (at paragraph 7.9) bases the analysis in the report on average build out rates of 250-267 per annum, peaking at 345, with an assumption of 3 sales outlets after 5 years of land sales. I appreciate that this information is discussed in the context of supporting viability work however, the expectations do not lend support to the Council's assumptions.
52. During the hearing sessions the Council spoke about the transformative growth that could result from Bedford's position within the Corridor being a public policy intervention capable of driving higher levels of growth. No evidence has been produced to justify a level of premium that may be attributed to this factor. Indeed, attempting to produce such evidence may be of limited value due to the level of uncertainty.

53. The delivery rate for larger sites is also naturally constrained by traditional factors that would exist regardless, such as master planning and arriving at an acceptable scheme, opening up, providing infrastructure, and resource availability. As such, attaching a high level of premium to delivery rates due to Corridor growth is not a justified approach. It is instead more logical to take a cautious attitude to this issue.
54. Overall, I am not satisfied that the assumed build out rates for either Little Barford or Kempston Hardwick are based on justified assumptions that are soundly based. This is the case before factoring in the uncertainty around infrastructure delivery timings discussed above and is a view that only hardens once the two issues are considered alongside each other.

Implications for the soundness of the Plan and next steps

55. As discussed above, the soundness of the spatial strategy (and therefore the Plan) is fundamentally linked to the deliverability of strategic infrastructure and the reasonableness of the assumptions on alignment with anticipated growth. For the reasons explained, I am unable to draw the conclusion that the highway mitigation that the Plan relies upon has a reasonable prospect of being delivered within the timescale envisaged. This includes the A421 widening project, which I regard as a fundamental piece of strategic infrastructure, along with other projects that would rely on National Highways funding. In addition, the assumed build out rates for the two new settlements on which so much of the Plan's growth relies upon are not based on justified assumptions.
56. By the Council's own acceptance, the Plan has very little flexibility built in that may assist with managing either of these issues. Relying on a standard 5 year plan review to respond to significant unexpected circumstances would not be effective due to the stepped requirement set out in the Plan, and the emphasis it places on higher levels of growth after 2030 to address under delivery against assessed need earlier in the plan period. From the evidence presented, I am not satisfied that housing needs after 2030 would be addressed as anticipated, leaving an overall gap in provision against assessed needs within the Borough across the entire plan period (including affordable housing).
57. Taking the three issues of assumptions around infrastructure delivery, build out rates, and the reliance on a stepped trajectory together, I am unable to conclude that the Plan meets the tests of soundness at paragraph 35 of the NPPF.
58. In light of Council's chosen spatial strategy, it may be the case that the issues relating to strategic infrastructure provision make the Plan incapable of being delivered. In these circumstances, a natural conclusion would be to advise withdrawal of the Plan to allow for a new plan based on a strategy that can deliver the growth required in the plan period to be developed.
59. Before recommending this course of action, I expect the Council would appreciate the opportunity to consider what action might be undertaken to start to address the fundamental issues of soundness that I have identified. I would therefore suggest the following, as a starting point.

Strategic infrastructure

60. Greater certainty is needed in relation to the timing of delivery and effectiveness of the road projects that rely on National Highways as the main source of funding, particularly the schemes that are identified as being in place by 2030 that would clearly need to be part of the RIS3 programme for that to be at all achievable.
61. Without that greater level of certainty it is not possible to reliably consider and conclude on whether the mitigation that the Plan relies upon would be effective, even at a strategic level, including any wider impacts such as those beyond the borough boundary.
62. The level of certainty required would be a question of judgement. It should be recognised that the PPG does not require absolute certainty or even confirmation of funding (although that would of course be helpful). It should also be acknowledged that agreement in principle at the plan making stage does not prejudice any party should a detailed solution not be considered acceptable at the development management stage.
63. However, the evidence does need to point towards there being a reasonable prospect that the infrastructure will be there within the envisaged timescales and that the mitigation will be effective in principle. Otherwise, the approach in the Plan of requiring detailed solutions to come forward through individual allocation policies would not be effective.
64. Clearly National Highways would be a key stakeholder in demonstrating this. Their Position Statement [ED59] points towards developing a further statement of common ground, which I agree could be an important piece of evidence, subject to the contents indicating the required level of certainty. I am, however, concerned about the potential timescales for this work and whether it is reasonably achievable within the lifetime of this plan examination. I would therefore ask for a detailed and publishable timetable to be submitted, along with confirmation from National Highways that they will work with the Council as a matter of priority – indeed, I ask that National Highways take this letter as a request from me that they do so.
65. In addition, if there is flexibility in terms of delivery of growth and funding of local level infrastructure projects that could help manage timing uncertainties then that should be clearly and more consistently set out in the evidence.
66. Only once this work is complete, and the necessary certainty is available, would I be able to properly reconsider whether it is adequate and any wider effects, including beyond the Borough boundary.

Housing land supply

67. In the absence of better evidence on build out rates, and in circumstances where (even if greater certainty on deliverability of National Highways projects is achieved) the risk of delayed delivery of strategic infrastructure will exist as a consequence of the Council's chosen spatial strategy, the housing trajectory should be adjusted to adopt more realistic/ cautious rates of anticipated delivery for both Kempston Hardwick and Little Barford. I appreciate that this would be a question of judgment. However, the assumed rates should be based on the best available evidence and should not rely on an unjustified premium arising from Corridor growth. This exercise would inevitably reveal a shortfall in the Plan meeting housing need in full over the Plan period.
68. Considering the points at paragraphs 45 to 51 of this letter, and applying them to both new settlements, would indicate an overall shortfall of at least 2000 homes across the Plan period. I set this out purely to illustrate on an indicative basis the scale of the potential shortfall based on the evidence available. The Council would no doubt wish to consider this matter further.
69. For the Plan to deliver against the identified housing need in full, and therefore be positively prepared, the Council would need to consider how to make up for the shortfall. The starting point for this would naturally be to consider whether additional allocations could be brought forward, particularly for development earlier in the plan period.
70. As part of this, I would highlight that the Council has chosen to exclude rural and service centre growth as an option for the reasons explained in the Topic Paper [F1]. I appreciate the wish to avoid highly dispersed growth across the Borough that may occur were development to take place in line with the reasonable alternative assumption of 4000 plus homes across all centres (i.e. centre maximisation).
71. However, I would question whether a more nuanced approach to the assumptions around centre growth would better reflect the fact that key and rural centres across the Borough differ in size and in terms of their proximity to other settlements (including Bedford town) and therefore their potential capacity to deliver development that may fit the chosen spatial strategy. As part of considering additional sites (and not at the exclusion of considering other options), the Council should explore whether an option that includes an element of targeted centre growth based on lower growth assumptions than the centre maximisation approach that currently flows through the work on reasonable alternatives can yield more sites that accord with the chosen spatial strategy.
72. The Council will no doubt wish to consider the issue of additional sites further, which may include whether an amendment to the chosen spatial strategy is needed in order for the required level of growth to be able to come forward. There may be other possible solutions, but I leave that to the Council to consider, in the first instance at least.

Conclusion

73. I have set out in this letter the reasons for my fundamental concerns about the soundness of the Plan. In light of the concerns, unfortunately the examination is not in a place where we are able to move forward to the main modifications stage. I have included an indication of the actions that would be necessary to begin to move the examination forward. This would be a starting point, rather than a guarantee that the examination would then be able to proceed.
74. I am aware that the actions that I have set out are unlikely to be simple or quick to address. I am duty bound to question whether it is realistic to expect this work to be done within the reasonable lifetime of a plan examination, paying regard to other parts of the evidence base that may become out of date (including any assumptions about other pieces of infrastructure), the need for other participants to remain engaged in the process, and the possibility that the outcome of the work may result in a fundamentally different plan to the one that is presently before me. To proceed with further work within the lifetime of this examination, I would need reassurance from the Council on these points.
75. I appreciate that the advice in this letter is not welcome news. However, I hope it provides the Council and other participants with a clear understanding of the issues and the conclusions that I have reached to date. The Council will rightly now wish to carefully consider next steps, for which I will gladly now allow a period of time. In due course I would be grateful for a formal response on how the Council would like to proceed, which should be communicated via the Programme Officer in the usual way.
76. For the avoidance of doubt, I am not inviting or accepting further submissions from parties other than the Council at this stage.

Darren McCreery

INSPECTOR