

**Item 5 Appendix 2: Bedford Borough Local Plan 2035: North Northamptonshire Joint Planning Committee representations**



**Representation form for the Bedford Borough Local Plan 2035: Plan for Submission (Regulation 19 publication)**

**Part B – Your representation(s) – POLICY 27**

**5. Do you consider the Bedford Borough Local Plan 2035: Plan for Submission to be legally compliant? n/a**

Yes  No  Don't know

**If NO, is this because it is:**

*(Please tick all that apply)*

- Not prepared in accordance with the Local Development Scheme
- Not prepared in accordance with the Statement of Community Involvement
- Not consistent with the regulatory requirements for consultation
- Not compliant with the Duty to Co-operate
- Not accompanied by a compliant Sustainability Appraisal

Please give details of why you consider the Bedford Borough Local Plan 2035: Plan for Submission is not legally compliant. Please be as precise as possible

**6. Do you consider the Bedford Borough Local Plan 2035: Plan for Submission to be sound?**

Yes  No  Don't know

**If NO, is this because it is:**  
*(Please tick all that apply)*

- Not positively prepared
- Not justified
- Not effective
- Not consistent with national policy

**6a. To which part of the Bedford Borough Local Plan 2035: Plan for Submission does this representation relate? (please select one option only)**

Paragraph	
Policy	27- Colworth Garden Village
Supporting documents	

**Please explain your answer to question 6. Please be as precise as possible.**

## Policy 27

Transport/infrastructure (xii) – Policy 27 sets out a number of criteria setting out how transport infrastructure is anticipated to come forward as CGV is implemented. Questions are raised, however, as to whether the necessary supporting evidence base (specifically transport modelling) has been undertaken to justify the Garden Village proposal; such that the scheme as envisaged by policies 26 and 27 is **not** (considered to be) **justified**.

Furthermore, it is considered that given its scale, to be **effective** Policy 27 should give further consideration to the wider spatial implications of CGV beyond its immediate locality (Sharnbrook/Santa Pod). To be justified (in accordance with the soundness test) policy criteria should give consideration to broader connectivity; with particular reference to green infrastructure, walking, cycling and public transport.

Overall, it is concluded that additional transport modelling is necessary in order to provide a justification for CGV and, therefore, to ensure the Local Plan is sound. Further details regarding the JPDU's concerns relating to transport modelling are set out below.

The JPDU has engaged positively with BBC through the preparation of the JCS and the Bedford Borough Local Plan. A number of Duty to Cooperate meetings have been held with the JPDU, BBC, East Northamptonshire Council, Borough Council of Wellingborough and Northamptonshire County Council (NCC) Highways to discuss cross-boundary issues. Despite these meetings there are concerns relating to the adequacy of the transport modelling work undertaken to assess the implications of the proposed Garden Village on the A6 in North Northamptonshire.

Discussions with NCC Highways have identified apparent inadequacies in the transport modelling work, which can be summarised as follows:

- The model on which the published outputs are based does not extend into Northamptonshire and therefore does not accurately reflect trips north on the A6;
- The implications of not factoring in this work are exacerbated by the future delivery of the Rushden East Sustainable Urban Extension to the east of Rushden (which includes 2,500 new homes and employment provision) which in turn could affect trips south along the A6;
- Trip levels indicated in the modelling appear low, especially in the p.m. period;
- The modelling does not appear to have included the trips generated by the additional 7.25 ha employment provision at Colworth Garden Village;

NCC Highways has raised concerns over the potential impact of these issues and has through Duty to Cooperate meetings agreed to work with BBC on the transport modelling.

It may be possible to address these concerns by updating the model, including undertaking additional data collection to ensure the impacts on relevant routes in North Northamptonshire are understood and that negative impacts can be mitigated. However, without this information the outcomes and potential mitigation measures remain unclear. Therefore, until this position is resolved to the satisfaction of NCC Highways, it is necessary to raise an objection in relation to the transport modelling.

The JPDU would welcome the opportunity to work with BBC in seeking to resolve issues raised in the representations prior to the Examination.

**7. Please set out the changes that you consider are necessary to make the Bedford Borough Local Plan 2035: Plan for Submission legally compliant and/ or sound, including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/ or sound. Please be as precise as possible.**

**Suggested amendments to policies 27, to make the Bedford Borough Local Plan 2035: Plan for Submission, sound**

**Policy 27**

Further policy criteria are considered necessary to ensure that the CGV proposal is sound (i.e. justified and effective). These would need to address the following issues:

- (xii) Impacts upon A6 corridor between Bedford, Rushden and Kettering, with reference to the further transport modelling that is asserted as being necessary to justify the CGV proposal and inclusion of identified mitigation measures within the Policy;
- (xv) Explicit reference to delivering green infrastructure (GI) connections between the proposed Rushden East Country Park and CGV, having regard to the Rushden – Soldrop Local GI Corridor (North Northamptonshire Joint Core Strategy Figure 17/ Policy 19);
- (xiii) Consideration of potential for connections between East Northamptonshire Greenway and the proposed Colworth/ Sharnbrook station;
- Recognition in Policy 27 or its supporting text that services from the Parkway Station should not negatively impact on rail service provision/frequency from North Northamptonshire.
- (xii) Public transport connectivity – improvements to bus services along the A6 corridor, between Rushden East, Rushden Lakes and Sharnbrook, including the Parkway Station.

Overall, it is emphasised that the site specific CGV policies, in view of the proposed scale of development, should give far greater consideration to the wider spatial implications of the proposal and necessary mitigation measures in order to be **justified** and **effective**, and therefore, sound. In the light of our concerns about the transport modelling, enhanced public transport links could potentially mitigate the impact of the proposal on the A6 and other relevant routes.

**8. If your representation is seeking a change do you consider it necessary to take part and speak at the examination hearing(s) if invited to do so by the inspector?**

Yes

No

**If you wish to take part in the examination hearing(s), please outline why you consider this to be necessary:** *(please note the inspector will determine who will be invited to be heard at the examination hearing(s))*

To provide further explanation in relation to our representation.

**9. Do you wish to be notified of any of the following?** *(please tick all that apply)*

- When the Bedford Borough Local Plan 2035: Plan for Submission has been submitted for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended).
- When the report of any person appointed to carry out an independent examination of the Bedford Borough Local Plan 2035: Plan for Submission is published.
- When the Bedford Borough Local Plan 2035: Plan for Submission has been adopted

Please attach any documents you wish to submit with your representation.

**Part B – Your representation(s) – POLICY 94 (Appendix 4e)**

**5. Do you consider the Bedford Borough Local Plan 2035: Plan for Submission to be legally compliant? n/a**

Yes

No

Don't know

**If NO, is this because it is:**

*(Please tick all that apply)*

- Not prepared in accordance with the Local Development Scheme
- Not prepared in accordance with the Statement of Community Involvement
- Not consistent with the regulatory requirements for consultation
- Not compliant with the Duty to Co-operate
- Not accompanied by a compliant Sustainability Appraisal

Please give details of why you consider the Bedford Borough Local Plan 2035: Plan for Submission is not legally compliant. Please be as precise as possible

**6. Do you consider the Bedford Borough Local Plan 2035: Plan for Submission to be sound?**

Yes

No

Don't know

**If NO, is this because it is:**

*(Please tick all that apply)*

- Not positively prepared
- Not justified
- Not effective
- Not consistent with national policy

**6a. To which part of the Bedford Borough Local Plan 2035: Plan for Submission does this representation relate? (please select one option only)**

Paragraph	12.26-12.32
Policy	94 – Transport infrastructure and network improvements
Supporting documents	

**Please explain your answer to question 6. Please be as precise as possible.**

**Transport infrastructure and network improvements**

It is noted that Policy 94 specifies the strategic transport infrastructure projects that are anticipated to come forward during the Plan period (to 2035). Policy 94(iii) refers to the proposed Wixams railway station, but there is no equivalent reference to the proposed Colworth/Sharnbrook Parkway railway station.

It is understood from previous Duty to Cooperate meetings that the process of bringing the proposed Parkway Station is already underway, involving the preparation of a feasibility study and engagement with Network Rail. However, it would be helpful to explain this within the supporting text to Policy 94 (paragraphs 12.26-12.32). It would also be important to clarify that the Parkway Station should not impact on rail service provision from North Northamptonshire.

This matter needs to be clarified in order for the Plan to be effective. It is assumed that this is an unintentional omission, but this should be clarified and/or corrected in order for the Local Plan to be made sound.

The JPDU would welcome the opportunity to work with BBC in seeking to resolve issues raised in the representations prior to the Examination.

**7. Please set out the changes that you consider are necessary to make the Bedford Borough Local Plan 2035: Plan for Submission legally compliant and/ or sound, including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/ or sound. Please be as precise as possible.**

**Suggested amendments to Policy 94 and supporting text, to make the Bedford Borough Local Plan 2035: Plan for Submission, sound**

Include further explanatory information regarding the proposed Colworth/ Sharnbrook Parkway Station within the supporting text to Policy 94 (paragraphs 12.26-12.32).

Clarify the status of the proposed Colworth/Sharnbrook railway station within Policy 94.



**8. If your representation is seeking a change do you consider it necessary to take part and speak at the examination hearing(s) if invited to do so by the inspector?**

Yes

No

**If you wish to take part in the examination hearing(s), please outline why you consider this to be necessary:** *(please note the inspector will determine who will be invited to be heard at the examination hearing(s))*

**9. Do you wish to be notified of any of the following?** *(please tick all that apply)*

- When the Bedford Borough Local Plan 2035: Plan for Submission has been submitted for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended).
- When the report of any person appointed to carry out an independent examination of the Bedford Borough Local Plan 2035: Plan for Submission is published.
- When the Bedford Borough Local Plan 2035: Plan for Submission has been adopted

Please attach any documents you wish to submit with your representation.