

Bedford Borough Council

Local Plan 2035

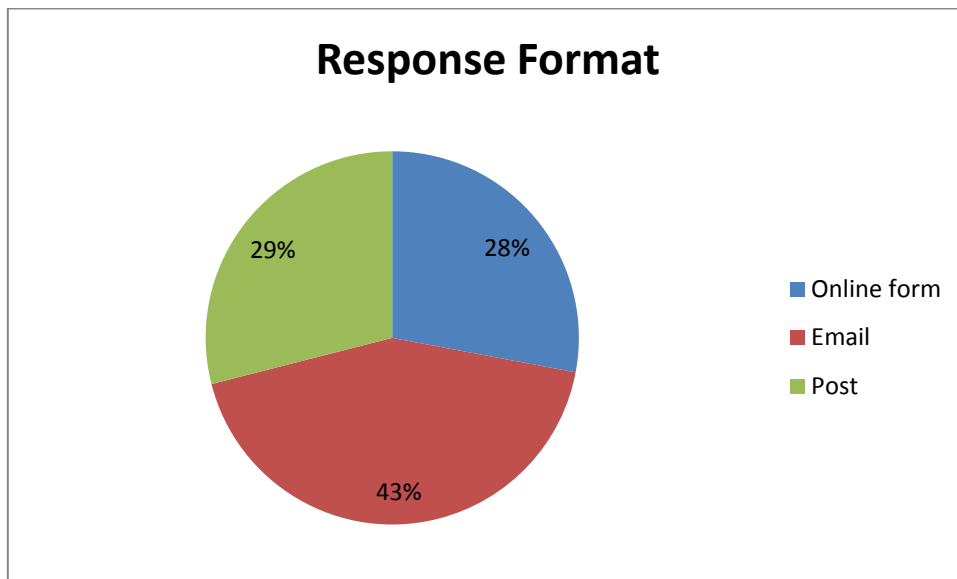
Summary of Consultation Results 2017

October 2017

1. Overview

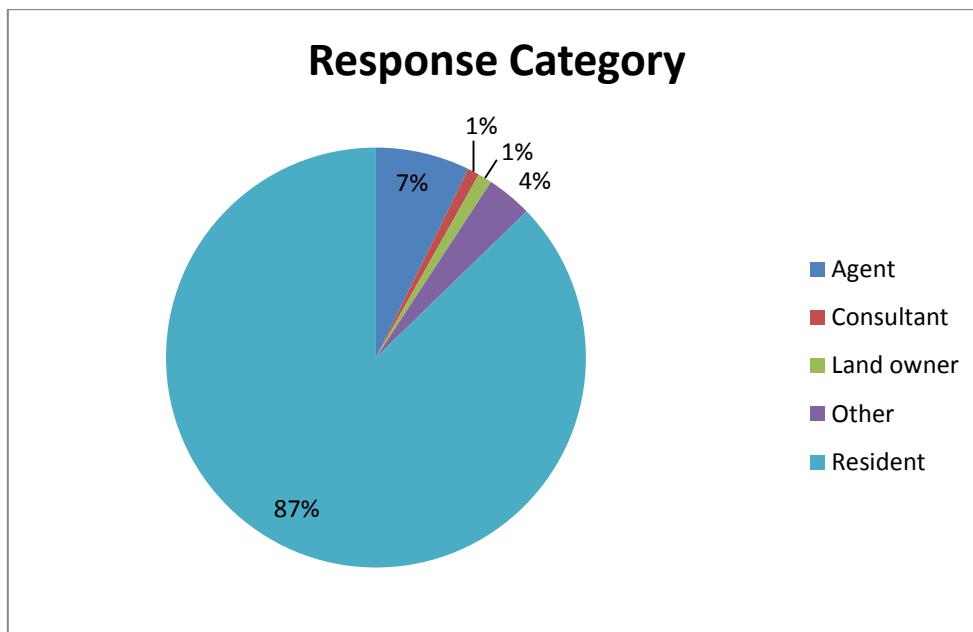
The Local Plan 2035 consultation took place between 24th April and 9th June 2017. In total 1,852 responses were received. 71% of people responded digitally, the remainder submitted their comments on paper.

Figure 1



The following diagram shows that the majority of those who responded to the consultation told us they were residents.

Figure 2

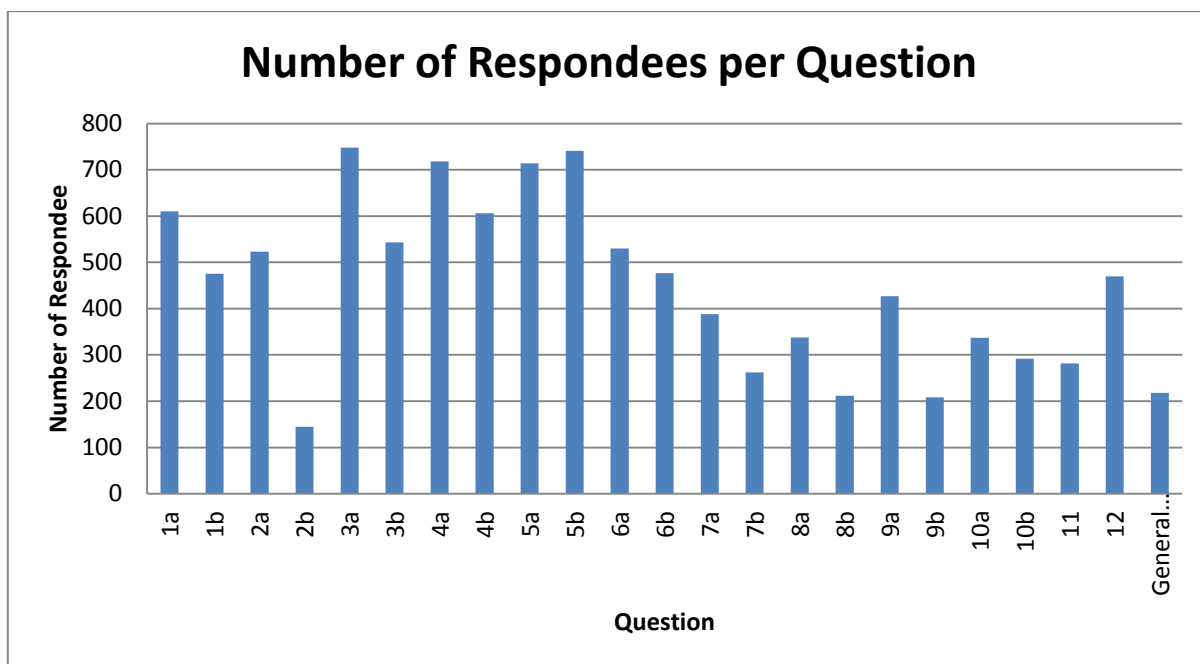


Four petitions were received.

- One objecting to development around Cleat Hill, specifically, sites 189 and 491. Dr T Kamyar 82 signatures.
- One objecting to development around Kempston Rural. Mrs Sarah Fogarty 200 signatures.
- One objecting to development in Biddenham, specifically, sites 29 and 691. Prof and Mrs S Ackroyd 40 signatures.
- One objecting to new settlement development. From Sharnbrook Farm Shop 52 Signatures.

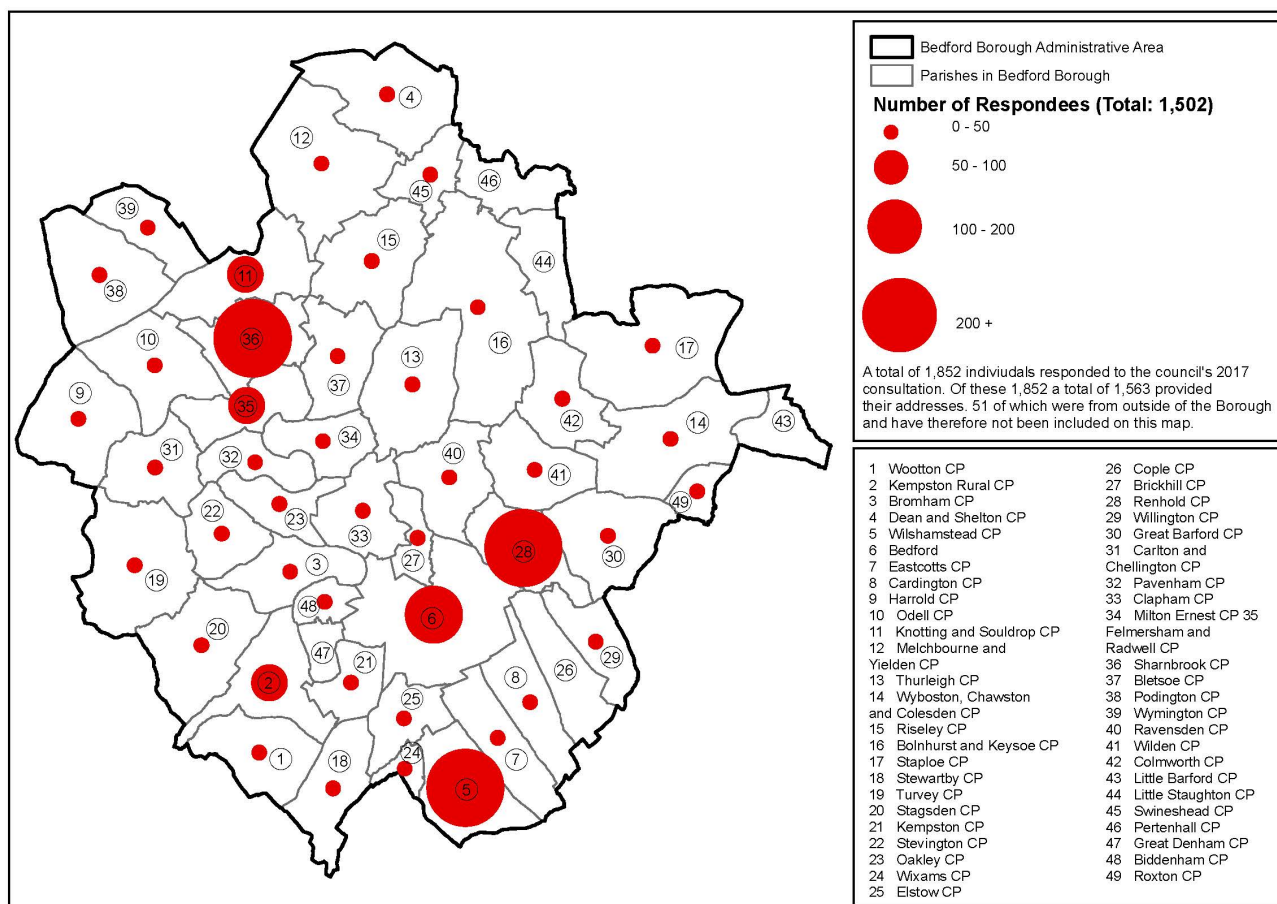
The response form invited comments in response to twelve questions. The wording of the questions can be seen in part 2 of this consultation summary report. The following bar chart shows how many responses were received to each question.

Figure 3



The map below illustrates how many responses came from different locations in the borough. Not everyone who responded gave an address so not all respondees are represented. The origins of responses from people who live outside the borough (51 or 2.8% of all responses) are not shown.

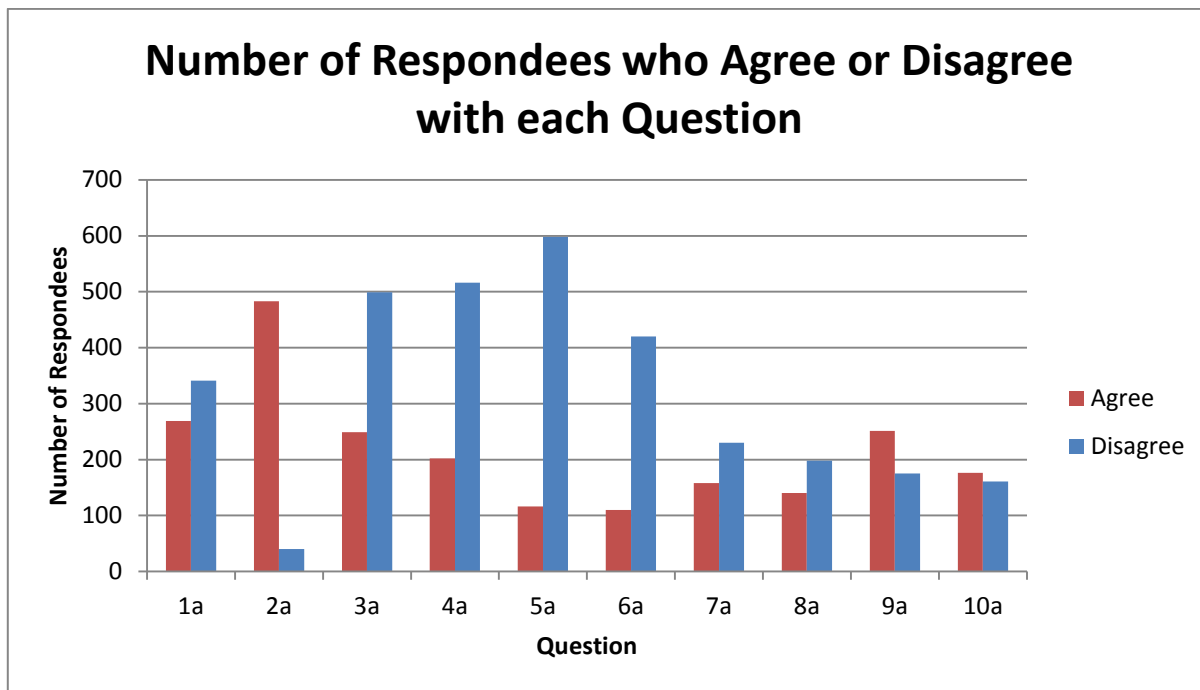
Figure 4 Where responses came from



2. Summary of issues raised by question.

The following pages summarise the main issues raised in response to the twelve questions. This is not intended to be a full and exhaustive list of the individual comments that were made; all responses are published in full on the Council's Web site (www.bedford.gov.uk/localplan2035). Ten of the twelve questions asked if those responding agreed or disagreed with what was proposed in the draft strategy. The following bar chart shows the response by question.

Figure 5.



Question 1 was about the part that new settlement(s) play in the preferred development strategy. Those responding were asked to tell us by answering Question 1 whether they agreed or disagreed that one or more of the new settlement proposals should form part of the development strategy.

Question 1a) Do you agree or disagree that one or more of the four new settlement proposals should form part of the development strategy?

610 responded

Agree 269

Disagree 341

Question 1b) If you disagree, the 2,200 dwellings identified for new settlement(s) as part of the preferred strategy will need to be provided elsewhere: where should the development go instead?

475 responded

Alternatives suggested

- Don't identify new settlement in this plan – only an area of search with precise location in a separate plan. This would allow Local plan 2035 to be adopted without delay.
- In and around Bedford as this is a more sustainable location.
- Extend the urban area- Freeman's Common, Brickhill, Kingsway, Beverley Crescent, new estates south of Bedford off the A6, Amphill Road.

- East side of Bedford.
- Smaller developments allocated to more numerous locations across the borough.
- Away from existing villages.
- Only in existing villages where the existing infrastructure can cope.
- Brownfield sites/derelict land.
- A new town south of Bedford.
- Extend Wixams.
- Kempston/Kempston Hardwick.
- Stewartby.
- Clapham.
- Sharnbrook.
- Great Barford.
- Wilstead.
- Thurleigh.
- NE of the Borough.
- More in the Marston Vale.
- Outskirts of Rushden.
- Expand north Brickhill development.
- Look for more publicly owned land in the urban area.
- Along the A421/edge of bypass where there is existing housing.
- Shared out amongst the Group 1, Group 2 and Group 3 villages.
- More in Group 3 and 4 as well as the proposed Group 1 developments.
- More sustainable locations – not isolated ones such as the new settlements.
- More development in the Group 2 villages e.g. Harrold, Oakley.
- In accessible locations close to bus routes/rail.
- South of Interchange retail Park.
- Instead of Covanta.
- Space above shops in Bedford.
- Old Aspects site.
- Empty Offices.
- South of Bromham Rd.

Question 2 was about the part that the former Stewartby Brickworks plays in the preferred development strategy. Those responding were asked to tell us by answering Question 2 whether they agreed or disagreed that the brownfield site opportunity at Stewartby brickworks should form part of the preferred development strategy.

Question 2a) Do you agree or disagree that the brownfield site opportunity at Stewartby brickworks should form part of the preferred development strategy?

523 responded

Agree	483
Disagree	40

Question 2b) If not, the 1,000 dwellings proposed at Stewartby Brickworks as part of the preferred strategy will need to be provided elsewhere: where should the development go instead?

145 responded

Comments about Stewartby

- Protect the conservation of the village – a high standard of design is needed.
- Must have affordable housing.
- Retain the chimneys.

- Scope for more than 1000 houses. Maximise this brownfield site.
- Consider opportunities to contribute to the Bedford to Milton Keynes Waterway Park.
- Make this into another garden village.
- Clarify east west rail route before development commences.
- Good road and rail links.
- Must have community infrastructure.
- Improve existing infrastructure e.g. provide mains gas.

Alternatives suggested

- Wyboston.
- Wixams.
- In and around the urban area.
- Larger villages/Key Service Centres.
- Brownfield sites elsewhere in the Borough.
- NE Bedford area.
- Low density Group 3 areas.
- Closer to the new bypass.
- Thurleigh airfield.
- Smaller developments spread around the Borough.
- Make a growth corridor between Stewartby and Bedford.

Question 3 was about the part that sites in and on the edge of the urban area play in the preferred development strategy. Those responding were asked to tell us by answering Question 3 whether they agreed or disagreed that all suitable and available sites in and on the edge of the urban area should be allocated.

Question 3a) Do you agree or disagree with the principle that all suitable and available sites in and on the edge of the urban area should be allocated? Currently this amounts to around 1900 dwellings.

748 responded

Agree 249

Disagree 498

Agree and Disagree 1

- Urban and edge of urban sites meet sustainability criteria and result in moderate growth in car usage.
- More sustainable location than village sites.
- Principle of all suitable and available sites in and on the edge should be priority providing allocation doesn't blur the edges of other discrete settlements.
- The use of previously developed urban land should be prioritised for development over rural sites.

Question 3b) If you think that not all of this should be allocated for development where should the development go instead?

543 responded

Alternatives suggested

- Put in new settlement (all four options mentioned). Larger sites such as new settlements provide more certainty rather than edge of urban sites which require multiple landowners to deliver.
- Only build on brownfield land not any green field land.
- Use brownfield sites first.
- Allocate to the south and south west in conjunction with East-West rail.
- More emphasis on existing villages.

- More dispersed development including smaller sites in smaller (grp 3 and 4) villages.
- Allocate further sites in the urban area before edge of urban/other villages
- Kempston Hardwick.
- Build where infrastructure can be improved.
- Use old school sites.
- Agree with sites in urban area but not on the edge.
- Self build plots through careful reduction of green space in Putnoe and Brickhill.
- North Beds
- Beverley Crescent site
- Freeman's Common site
- Kingsway
- Gibraltar Corner
- Great Barford
- Sharnbrook
- Wixams
- Harrold
- Thurleigh
- Stewartby
- Wyboston
- Build along bypass
- Build nearer to London

Question 4 was about the urban and edge of urban sites. Those responding were asked to tell us by answering Question 4 whether they agreed or disagreed with the proposed allocation of any of the sites that are identified in the tables contained within the consultation paper.

Question 4a) Do you agree or disagree with the proposed allocation of urban and edge of urban sites listed in table 1 and table 3?

718 responded

Agree	202
Disagree	516

Question 4b) Are there any sites which you think should not be allocated or any other sites which you think should be allocated and why?

- 606 responded Agree with the urban but not edge of urban sites.
- Definition of edge of urban is ambiguous.
- Infill only.
- Self build plots.

Disagree with Salph End Renhold

- Impact on landscape, character of Renhold, sustainability and lack of infrastructure, highway impact, wildlife habitat, light pollution, lack of services and facilities already, loss of the gap between Bedford and Renhold, contradicts the settlement hierarchy of assessing Renhold as a group 3 village. Existing traffic issues.

Disagree with all urban and edge of urban sites

- Concern would result in urban sprawl and coalescence.
- Agree with the principle of the locations but not with the scale proposed.

Disagree with sites to the north and west of Bedford due to traffic

Disagree Land rear of Bromham Road

Disagree Rugby Club

- Bottleneck and traffic gridlock already, number of dwellings proposed is too high, will block sunlight from resident's gardens, noise pollution, litter pollution, odour from agricultural waste on the rugby ground.

Disagree Duckmill Lane

Disagree Ford End Road

- Will exacerbate traffic problems on Ford End Road and Bromham Bridge – doubtful allocation unless noise and access issues can be overcome.
- Space could be used instead for an improved train station and improved parking.
- 500 dwellings will have a negative impact on the town centre and area around the town.

Disagree Gibraltar Corner

- Importance of retaining a distinctive boundary for Wootton. Loss of agricultural land. Impact on listed buildings. Traffic impact. Parish has seen too much growth recently already. Loss of natural habitat. There are no local amenities. Unsustainable.

Disagree Gold Lane

- Concerns about coalescence. Impact on wildlife. Need for significant green buffer around the pond. Traffic concerns turning out onto Bromham Road. Will cause traffic problems.

Disagree Land RO Bromham Road

- Flooding, access, coalescence, wildlife habitat.

Disagree Lodge Hill

- Not adjacent to existing housing and would add to congestion on A6/ Sainsbury's roundabout, pressure on school places. Would add to gridlock already seen in that area.

Disagree Beverley Crescent

Suggestions for other locations in and on the edge of the urban area

- Develop 133 or 134 in Great Denham. Expand proposals at Bromham, Salph End, Kingsway, Brickhill and Freeman's Common/Graze Hill.
- Bromham and Clapham should be reclassified as edge of urban.

Question 5 was about the part that Group 1 villages play in the development strategy. Those responding were asked to tell us by answering Question 5 whether they agreed or disagreed with the amount of development allocated to the Group 1 villages.

Question 5a) Do you agree or disagree with the amount of development identified for the Group 1 villages as part of the preferred development strategy (2,600 dwellings)?

714 responded

Agree	116
Disagree	598

Question 5b) If not, should the amount be higher or lower, what should the number be and how should the strategy change as a result?

741 responded

- A lower number is required in Group 1 villages. Maximum of 100 or 10% increase.
- No allocations in Group 1 settlements.
- Amount proposed would dramatically change character of villages.
- Amount proposed cannot be supported by infrastructure and services.
- Loss of countryside and urbanisation of rural areas.
- Development should instead be nearer to Bedford, in or on edge of Bedford.
- All villages should have some growth.
- More housing is needed in Group 1 villages.
- Higher density for urban and edge of urban sites (and Stewartby brickworks) would reduce amount needed.
- Allocate more in and adjoining urban area / south and east of Bedford.
- Share amount more evenly between Group 1 and 2 villages.
- Include allocations in Group 3 and 4 settlements.
- Local communities / Parish Councils should decide amount of housing.
- Agree that Wootton should have no additional growth.
- Oakley should be a Group 1 village.
- Sites should be small so that can be better assimilated into villages.
- A6 and junctions into Bedford cannot cope with more traffic.
- Should also allocate employment sites in villages.
- Sites should not be allocated on 'best and most versatile agricultural land'.
- OAN figure is wrong and should be lower, thus allowing a lower allocation per village.
- Rural road network, especially east – west has insufficient capacity.
- More than 500 dwellings needed to support a new school.
- New settlements can take more growth in plan period.

Village specific comments – Stewartby

- Stewartby has better facilities and accessibility than some Group 1 villages and should have more growth.
- Retain chimneys and kilns.

Village specific comments – Bromham

- Bromham should take more growth.
- Bromham should take less growth.

Village specific comments – Clapham

- Clapham should take less growth.

Village specific comments – Great Barford

- Great Barford should take less growth.

Village specific comments – Sharnbrook

- Sharnbrook should take more growth.
- Sharnbrook should take less growth.
- Disproportionate increase compared to other villages.
- Support 100 dwellings.

Village specific comments – Shortstown

- Should include allocation at Shortstown.

Village specific comments – Wilstead

- Wilstead should take more growth.
- Wilstead should take less growth.

- Wilstead should not be a Group 1 settlement – incorrect scoring of facilities in hierarchy. Too close to another Group 1 settlement.
- Development should go instead to: Wixams, new settlements (increase allocation).

Village specific comments – Wixams

- Too much growth proposed in Group 1 villages which would be better located adjoining Wixams.
- Growth at Wilstead will impede sales at Wixams and should be reduced.

Village specific comments – Wootton

- Should allocate land north of Wootton.
- Sites in Wootton suitable for later in plan period.

Question 6 was about specific sites and options for delivering the amount of growth identified for Group 1 villages. Those responding were asked to tell us by answering Question 6 whether or not they agreed with the list of potential development sites in each village and which of the options, if any, they prefer. They were also able to suggest other combinations of sites.

Question 6a) Do you agree or disagree with the list of potential development sites in each Group 1 village (tables 4 – 8)?

530 responded

Agree	110
Disagree	420

Question 6b) Which sites in Group 1 villages would you prefer to see allocated and why? Which of the options do you prefer and why? Are there other combinations of sites?

477 responded

General comments

- Allocate all sites / brownfield sites / more sites.
- Choice should be made by local residents / Parish Council.
- Allocate sites in in Bromham / Clapham / Great Barford / Wilstead / Wixams / Wootton / Wyboston / Stewartby Brickworks
- Concern over capacity of A6 to carry extra traffic.
- Need rail station north of Bedford.
- Concern over infrastructure – utilities.
- Loss of greenfield land – use more brownfield land / increase densities.
- Less development in villages – up to 10% growth only.
- Need to clarify progress needed on Neighbourhood Plans.

Village specific comments – Bromham

- Agree with Option 1 west Bromham.
- Agree with Option 2 north Bromham.
- Disagree with Option 1 west Bromham.
- Disagree with Option 2 north Bromham.
- Allocate site 53 at south of Stagsden Rd.
- Allocate site 414 at Lower Farm Rd.
- Allocate site 55 / 412 at Northampton Rd.
- Allocate site 553 at Oakley Rd.
- Amend SPA boundary to include additional land at Bromham Rd.

Village specific comments – Clapham

- Agree with Option 1 north Clapham.

- Agree with Option 2 east Clapham.
- Disagree with Option 1 north Clapham.
- Disagree with Option 2 east Clapham.
- Allocate site 77 at Clapham Manor Hotel.
- Prefer small sites to large estates.

Village specific comments – Great Barford

- Agree with Option 1 north and east Great Barford.
- Agree with Option 2 east Great Barford.
- Agree with Option 3 south west Great Barford.
- Agree with site 127 Home Farm (part of Option 3 south west Great Barford).
- Agree with site 118 College Farm (part of Option 1 north and east Great Barford and Option 2 east Great Barford).
- None of the sites. Too much development.
- Choice should be made through Neighbourhood Plan.

Village specific comments – Sharnbrook

- Agree with Option 1 south and west Sharnbrook (amended).
- Agree with Option 3 south east and west Sharnbrook.
- Agree with Option 4 lower level of development (more frequently cited).
- Disagree with Options 1 – 3.
- Agree with site 251 Odell Rd.
- Agree with site 238 Yelow Lane.
- Agree with site 619 Park Lane.
- Agree with site 236 / 617 Kennell Hill.
- Allocate site 516 High St.
- Allocate site 337 Templars Way.
- Allocate site 245 Odell Rd..
- Too much development.
- Object to various specific sites. (Site 620 most frequently identified and also 236 / 617 – both Village Open Spaces.)
- Choice should be made through Neighbourhood Plan.
- Traffic issues in High St.
- Impact of additional traffic through other villages, particularly Felmersham.
- Concern over capacity of A6 to carry extra traffic.
- Concern over infrastructure: doctors, Upper School, drainage.
- Impact on character of village and countryside.

Village specific comments – Shortstown

- Agree no further growth.
- Allocate site 98 at College Farm.
- Allocate land adjoining Cardington Sheds for employment.

Village specific comments – Wilstead

- Agree with site 300 / 649 Howard Close.
- Agree with sites 674 / 302 / 349 Village Farm.
- Agree with site 297 Whitworth Way.
- Agree with sites 293 Cotton End Farm and 294 Cotton End Rd.
- Agree with site 648 Luton Rd.
- Allocate site at Duck End Lane.
- Allocate site at Luton Rd.
- Too much development.
- Object to sites shown in development option.
- Concern over infrastructure: doctors, traffic, flooding / drainage
- Impact on character of village and countryside.

Village specific comments – Wootton

- Allocate site 309 at Wootton House.
- Allocate site 651 at Cranfield Rd.
- Allocate site 652 at The Chequers PH.
- Allocate site 312 at Keeley Lane.
- Allocate sites 317, 318 north of Wootton.
- Allocate new site at Hall End Rd.

Question 7 was about the part that Group 2 villages play in the development strategy. Those responding were asked to tell us by answering Question 7 whether they agreed or disagreed with the amount of development allocated to the Group 2 villages.

Question 7a) Do you agree or disagree with the amount of development identified for the Group 2 villages as part of the preferred development strategy (225 dwellings)?

388 responded

Agree	158
Disagree	230

Question 7b) If not, should the amount be higher or lower, what should the number be and how should the strategy change as a result?

262 responded

Agree

- Amount proposed is in line with population growth, and is not too great a demand on any single village. In most cases could be easily assimilated into the current communities.
- 225 seems to be a reasonable number of new housing to existing traditional villages (200 limit would be better).
- The development identified for the Group 2 villages is acceptable but should not be increased.
- Development should enhance villages and maintain rural way of life .
- Broadly agree but the expansion of Group 2 villages should be minimised as much as possible.
- Some of these Group 2 villages would benefit from larger numbers to make them more viable and to encourage investment in facilities.
- Support the principle of allocating a portion of the housing target to Group 2 villages, although the actual figure should be better defined and on the higher side. These are the established village locations in the Borough that have a good range of facilities.

Disagree

Group 2 villages shouldn't be assigned any growth

- Building should not take place in villages as they do not have the infrastructure.
- Existing approvals should be completed before seeking to expand into the villages. This is a clear case of developers driving the market up by restricting supply.
- They shouldn't go anywhere. Our countryside is disappearing at an alarming rate. It needs to stop.
- We don't need more houses we need less people.

Group 2 villages should be allocated less growth

- Should be substantially less houses – no actual need.
- Housing numbers should be decided by the parishes in consultation with their neighbouring parishes, through Neighbourhood Planning, ensuring village separation.
- Development should be considered separately for each village.

- If you are proposing 225 houses between 6 villages than surely each village only needs to take up to 37 houses each.
- Villages should be allowed to grow slowly to enable integration.
- Some Gr. 2 villages are less sustainable.
- Proposed housing will destroy village character / Area of Gt. Landscape Value.
- Total should be 100 dwellings. A lower number would not put as much pressure on existing villages.
- Lower. I believe overall we could spoil all the Group 2 villages by developing as high as 50 dwellings per village.
- The scale of growth proposed for the Group 2 facilities is unsustainable given the relative lack of facilities and services they have.

Group 2 villages should take more growth

- Group 2 Villages should have greater development to help sustainability of their Key Services including primary schools.
- Should be a lot higher – take their fair share.
- Slightly higher, so as to share the burden
- Not hundreds but 50-100 would ensure sustainable growth. No growth will mean a change in demographics with an aging population.
- 50-150 as per 2015 consultation paper.
- Should be increased to around 400, 60-70 per village.
- Group 2 village plans seems disproportionately low to Group 1.
- The amount should be slightly more in each village say up to 65. This would be more equitable than imposing large developments on Group 1 villages.
- Development strategy is too constrained, quantum of development allocated should be increased as appropriate to meet a more affirmative, broader vision.
- This level of allocation does not make any sense and does not provide Group 2 villages with the opportunities to grow and thrive with increased levels of amenities.

Allocation strategy

- Should consider each village individually on organic basis not “pick and mix”.
- development should be more forensically considered rather than just proposing a range of 25-50 houses for most of the Group 2 Villages regardless of their individual characteristics.
- Not fully supported by the SAInflexible & unduly restrictive.....Based on narrow consideration of educational capacity.
- Should not allow landowners in these rural villages to drive decision making. The existing parishioners should drive the decision making.
- All Gr 2 villages should take their share incl. Willington and Stewartby in addition to brickworks
- Group 2 allocation process unclear, each village should undertake a Housing Needs survey – reflect local need
- Target figure should be calculated as a percentage of the existing village population - 5% or 10% of current number of dwellings.
- Too greater emphasis in strategy on rural North Bedfordshire.
- It would seem more logical to spread some of the allocation to Group 3 villages where possible
- Maximise opportunities for brown field development.
- Villages that are close to the Bedford/Kempston urban area, Oakley & Milton Ernest, should accommodate as much of this growth as possible

Question 8 was about specific sites for delivering the amount of growth identified for Group 2 villages. Those responding were asked to tell us by answering Question 8 whether or not they agreed with the list of potential development sites and which, if any, they prefer.

Question 8a) Do you agree or disagree with the shortlist of sites for each Group 2 village (tables 9 – 14)?

238 responded

Agree 140

Question 8b) If not, which sites should be included or excluded from the list? Which sites do you think should be allocated in each village to meet the strategy requirement?

212 responded

Village specific comments - Carlton

Included

- Carlton- Generally fine but extend the marsh sites to marsh farm
- Support site 450 - The Causeway,
- Support site 577 - The Marsh
- Support site 66 - The Causeway

Excluded

- Exclude Carlton 485 : Disproportionate in size. Would completely change the nature of the village, as well as destroy views to the countryside. Adjacent Site 68 has rightfully been "excluded from further assessment" as it is designated Important Village Open Space, but 485 extends around 68 and would itself block / ruin the utility of 68.
- Sites identified (other than 450, 577 and 66) are either back land sites that do not naturally extend the settlement pattern and integrate poorly, have difficult access positions or provide an arbitrary landscape boundary that is inconsistent with the landscape character of the surrounding countryside.

Village specific comments - Harrold

Included

- Harrold site 143 should be extended north
- Catesby's site west of Odell Rd, Little Odell (site ref.143)
- Town Farm (between site references 137/138, 141 and 142)
- For Harrold the allocation of sites will be decided as part of the Neighbourhood plan
- Site 140 should be included. It is available and deliverable. The site is flat, with no ecological constraints and is well enclosed. It does boundary with Harrold Mansion, but this can be dealt with in detailed design. The site has residential development on effectively three sides and the fourth is the Mansion.
- Site 606 has some logic to it, however it would require highway improvements at the Junction of New Road and the High Street.

Excluded

- sites 579 and 606 are far too big.
- Site 143 is a winter grazing area for geese from Harrold Odell County Park and is also an east-west wildlife corridor. It is remote from the village and as such considerably less sustainable.....would also promote coalescence towards Little Odell.
- Access difficult for sites 137 and 138.

Village specific comments - Milton Ernest

Included

- Milton Ernest: site 678 will require major investment in improvements to the A6 and the northern access into Bedford.
- site 678 - Rushden Road - capacity 15 - brownfield location within the settlement envelope amounting to infill.
- site 161 - Marsh Lane - capacity 5 - rear garden land but can amount to infill given the form of the settlement in that location.

Excluded

- Milton Ernest northern section of 678 should be removed.
- 678 should be retained as employment uses to keep jobs local and reduce pollution.
- 518/162 Marsh Lane is unsuitable for the extra traffic from 46 Dwellings

Sites 518/162 should be excluded altogether, it is an arbitrary site boundary, not an infill site and will lead to the loss of grade 2 farm land. It will have a negative impact on the landscape character of the settlement.

Village specific comments - Oakley

Included

- Land opposite Bedford Arms, (site 171)
- Site off Church Lane (ref. 169). The right of way can be incorporated into a scheme to enhance the pedestrian and cycle access from the village towards the river
- Add triangle against railway in Lovell road
- All the proposed sites should be accepted, for a larger scale of development here.
- Sites Numbered 531 – 529 . The land is part of the village - and as such is near the local schools, preschools and the bus stops and any building work would not disrupt the village
- The Land off Station Road (site 170, 521) should definitely be included in the list and be the only site of development. It is a natural area for growth and enlargement of the village, which would be easily integrated into the existing community as it is near the school and its sporting facilities, and other facilities near the old station. ...This easy integration would be to the benefit both of existing residents and those of the new development.

Excluded

- Sites 170 & 521. Development of either of these two sites would seriously further reduce a vulnerable strip of open countryside between the village and its immediate neighbour to the east, Clapham. Traffic issues. Unjustifiable in landscape terms.
- 169 development on west of Oakley will adversely impact the historic & scenic church, Oakley bridge & Great Ouse so need to be avoided, also traffic egress onto the narrow Church Lane would cause problems for service vehicles and deliveries. Rural setting would be lost. It is grade 2 agricultural land. There are better sites to develop that provide either more community benefit or are on poorer quality of land. The site is of a size that provides an excellent arable yield and if half the site was developed it would lead to the loss of the other half.
- Oakley 466 remove + northern 170.

Village Specific comments - Roxton

Included

- All development should be alongside existing roads. To create an 'estate' of houses in our small village would ruin the feel of it.
- Should include all 230 and park road frontage and 440 and 226 extended.

Excluded

- All of the sites in Roxton are located on either grade 1 or 2 agricultural land and should be resisted at all costs unless there is a specific community benefit. The sites are drawn with an arbitrary line and do not follow any defined defensible boundary.

Village specific comments - Turvey

Included

- Site 282 is the preferable site for allocation as there are a number of fundamental concerns arising in respect of the suggested alternatives. Site 282 would, alternatively, provide the opportunity to deliver the full quota of development for the village with scope for additional future growth
- The promoted site off Station Road, Turvey Station which is considered to be pdl and could deliver the entire allocation.
- Both sides of Newton Road should be extended
- 279 Priory Close (northern section only to avoid Ridge and Furrow area to the south).
- 283 Priory Farm. Site directly adjoins A428 allowing for provision of a good standard of access, possibly a roundabout in conjunction with 279. This could improve road safety considerably for all road users particularly from Station End itself (left turn out only)
- 633 Land off Station Road. This site already has planning consent for upwards of 78 assisted living units and 68 other bedrooms

Excluded

- Sites 280, 631 & 632. Sites 280 and 631 are accessible only via site 632. –
- All the sites listed (in Turvey) are undeveloped greenfield sites some of which are in agricultural use.
- 282 inappropriate- almost proposing building a side village rather than preferring to infill the shape and layout of the existing village. Poor substandard access via Carlton Road which gives poor and substandard access to the main highway network.
- 277 Chantry Yard. Poor substandard access onto Carlton Road which in itself gives poor access to the main highway network.
- 280 Land at Newton Lane. Substandard and unsafe access to the main highway network via Newton Lane. Also, this is at the same altitude as site 282 and overlooks the village and would detract from the character of the rural roads and lanes.
- 462 Meadow House. Very poor access via heavily parked residential roads and then via Carlton Road which in itself gives poor and substandard access to the main highway network.
- 631 Land at Newton Lane. Substandard and unsafe access to the main highway network via Newton Lane. Also, this is at the same altitude as site 282 and overlooks the village and would detract from the character of the rural roads and lanes.
- 632 Land at Newton Lane. Substandard and unsafe access to the main highway network via Newton Lane. Also, this is at the same altitude as site 282 and overlooks the village and would detract from the character of the rural roads and lanes.
- The only sites on the edge of the village that might be considered to be infill are 631, 632 and 280 however the highways impact might be prohibitive given that Newton lane is narrow and the site is very visible from the south as it forms part of a very large field

General

- Development of sites 170, 514, 632, 579, 606 and 678 would apportion the new homes far more fairly and sustainably.
- No objection to proposals listed in Table 9, 10, 13 and 14. Ouse Valley villages never had any improvements (apart of A6 bypass) and already gone through significant expansions (Clapham, Oakley, Milton Ernest and Sharnbrook).
- Group 2 villages can accommodate different number of dwellings. In some cases – as in Turvey – several neighbouring sites could be considered where better combined / complementary access could be achieved. This could provide more dwellings than the 25 – 50 “standard” thus reducing the requirement elsewhere and at the same time improving road safety.

Question 9 was about the approach for development in Group 3 and 4 settlements. Those responding were asked to tell us by answering Question 9 whether they agreed or disagreed with this approach. They were also asked to tell us if they had any comments on the wording of the policy.

Question 9a) Do you agree or disagree with the approach for Group 3 and Group 4 settlements in the preferred development strategy (that rather than having specific sites allocated in the local plan there should be a local plan policy to allow small amounts of development if supported by the local community)?

426 responded

Agree 251

Disagree 175

Question 9b) If not, how should Group 3 and Group 4 settlements be treated in the development strategy? Do you have any comments on the wording of the draft policy for Group 3 and Group 4 settlements?

208 responded

Disagree summary of comments

The general approach

- The approach is contrary to the NPPF & related guidance which says that all settlements can play a role in delivering sustainable development in rural areas and to enhance the vitality of rural communities. Not a sound planning strategy.
- The approach is unduly restrictive and will impact on local services. Growth is needed for communities to survive and thrive so more development is needed in Group 3 and 4 villages, not less, to ensure the long term sustainability of these communities. There would be economic and social benefits to growth.
- There is doubt about the new settlements and other group 1 and 2 village sites coming forward so sites in group 3 and group 4 settlements must be allocated.
- Group 3 and 4 settlements will become exclusive places to live, limiting social cohesiveness, increasing house prices; a socially divisive strategy.
- It is beyond the powers of the LPA to hand decision making to the local community in this way.
- Sites must be allocated in the local plan to make sure that development happens in these settlements. The Council shouldn't rely on Neighbourhood Plans or local communities to bring forward development. Parish Councils or the local community could prevent development from coming forward or the approach will lead to biased and unfair decision making.
- Settlements in groups 3 and 4 should all play a part in accommodating the new housing requirement. Suggestions include 5-10% of their current number of dwellings; 6 or 7 dwellings each; 15-50 dwellings each; 5-20 dwellings each; 10-20 dwellings each; 20-30 dwellings each; group 3 only 5+ dwellings; 1 or 2 dwellings in each group 3 and 4 settlement; have a target for all groups 3 and 4 and let the parish councils nominate sites for allocation;
- Affordable homes/downsize homes for elderly for group 3 and 4 settlements would be positive.
- Small easy to deliver development sites should be allocated in group 3 and 4 settlements to help five year land supply.
- Development in group 3 and 4 settlements ok but to meet local needs only.
- All villages (groups 1-4) should be considered on their merits with a bespoke number for each village. There should be a capacity led approach taking account of service provision and infrastructure. The individual circumstances of each village should be considered – they have a role to play in making space for growth.
- Groups 3 and 4 should be treated differently. Some sites in group 3 may be good for development over 5 units and could be traded-off against difficult sites in group 2.
- Development in groups 3 and 4 could help to meet growth needs of Luton and London.
- If each group 3 and 4 settlement took some growth then not so much would need to be allocated in group 1 and 2 villages.
- Amount of growth should be relative to current population.
- Lazy and disingenuous to ignore smaller potential development sites.
- Smaller settlements could move to group 1 or 2 category if new facilities were provided. It would be a positive thing to have more, larger villages.
- If groups 3 and 4 settlements don't have development this time around then they should have some development allocations next time.
- Decisions on development sites in small villages can become contentious locally, and should be made by unbiased independent planners.
- Build only on brownfield sites. Don't build on agricultural land, our countryside is disappearing.
- Fewer people not more houses.
- Development will impact on special areas for wildlife.

Comments on the policy itself

- The wording is too vague.
- The criteria are too onerous – applications to be considered on their merits only.
- The need for evidence is burdensome.
- The policy should refer to the majority of respondents (rather than the community) and unanimous support of the PC.
- Remove word 'exceptionally'. No justification for this.
- The policy should encourage provision of new facilities and services also.
- Development on brownfield land shouldn't have to meet such stringent criteria.
- The requirement to relate proposed development to the threat of closure of a local facility places unreasonable burden of proof on the potential applicant. Timing to gather evidence may mean that the facility has closed before permission for development has been granted.

Agree summary of comments

- Agree, given the lack of services and facilities in these villages. A sensible approach for smaller villages.
- Fully support the draft policy. It is particularly helpful to small communities where there are insufficient resources to prepare a neighbourhood plan but small developments may be possible.
- Important that the local community can make decisions on development proposals in these villages. They are in the best position to judge. Residents can choose where least disruption will occur. Development must complement local communities.
- Must also be agreement from nearby affected communities.
- Clarity required on the impact that a SPA will have on the application of this policy.
- Development should be small scale – 2 or 3 houses. It must reflect the rurality of the villages.
- If small means fewer than 50 houses.
- Affordable housing only or infill within village boundaries.
- Approach to group 3 and 4 settlements should be extended to groups 1 and 2.
- Development in groups 3 and 4 settlements should be determined in parish (neighbourhood) plans.
- Numbers can be used to satisfy Local Plan 2035.

Question 10 was about Local Green Spaces. Those responding were asked to tell us by answering Question 10 on the separate response form whether they agreed or disagreed with the selection of Local Green Spaces.

Question 10a) Do you agree or disagree with the selection of Local Green Spaces?

337 responded

Agree	176
Disagree	161

Question 10b) If not, and given the site assessment work that has already taken place, which sites do you think should be removed from or added to the list?

292 responded

Disagreement with the way the assessment has been applied relating to specific parishes:

- Clapham
 - Stevington
 - Great Barford
 - Pavenham
 - Felmersham
 - Oakley
 - Biddenham
 - Odell
 - Ravensden
 - Harrold
 - Brickhill
 - Wilstead
 - Milton Ernest
 - Renhold
 - Kempston
 - Wootton
-
- The determination of LGS should be by residents or in Neighbourhood Plan
 - Housing sites should be removed and not Local Green Spaces.

- People requesting that new sites should be a LGS, but no further details provided.
- No sites proposed in Sharnbrook.
- No need to restrict the size of the site to less than 10 ha.
- Some questions are subjective such as demonstrably special.
- BBC have not taken into account the views of local people when they have voted for the green space in a parish council or neighbourhood plan survey. The judgement of local people should be paramount in the decision making process.
- Demonstrably special needs to be reviewed.
- The use of the word “tranquillity needs to be reviewed.
- A reassessment of sites in Renhold required and no assessment so far of their contribution to the conservation area setting, ancient woodlands or wildlife corridors.
- There is no consideration of whether the proposed Local Green Spaces should be identified for other forms of protection such as PVAAAs (protected village amenity area).
- A site which is a village open space in Carlton – questioning why the site was designated as a VOS.
- Methodology should have been made available earlier.
- The submission form did not give space for any detailed evidence to be provided as to what was demonstrably special.
- Methodology has not been applied consistently and the BBC interpretation is more restrictive than allowed by the NPPF.
- Green Spaces already identified in the current policy maps should continue.
- There are no sites shown for Kempston Rural. All of the submitted sites could be allocated as green spaces
- Request for additional sites to be considered in Brickhill Parish, Clapham Parish and Bletsoe.
- Concern that if Harrold Lake is designated, it could become an urban pond with housing surrounding it and have an effect upon wildlife
- Agreement with the Council’s methodology for sites at Oakley, Renhold, Upper Dean

Question 11 was about the evidence base documents that explain our thinking for the local plan. Those responding were asked to tell us by answering Question 11 if they had any comments on any of these documents.

Question 11 Do you have any comments on any of the updated or new evidence base documents?

282 responded

General comments about the scope of the evidence base

- Many comments regarding the assessment of traffic impacts both in relation to the new settlement proposals (in relation to the A6 corridor in particular) and the need for assessment of traffic impacts more generally in relation to site selection and the development strategy as a whole i.e. that transport modelling should be used to assist the identification of sites.
- Comments about the need to make reference to the NIC material about the Oxford to Cambridge corridor and the extent to which it has /should influence the development strategy as a whole. Comments that the Borough should be more proactive in planning for growth along the A421 – the O2C Expressway
- The local Joint Strategic Needs Assessment should be considered in the evidence base for the Local Plan.
- Playing pitch strategy should be updated.
- Plan should include evidence on farming and food supply.

SHMA

- Concerns about the SHMA outputs. Some respondents argue that the real need is below that identified in the SHMA and should be only 11,000 or 15,000. Others argue that the OAN should be in excess of the 950 dpa identified in the SHMA and should be raised to 1,100 or 1,200 dpa.
- Concerns about the SHMA methodology including use of long term trends, 5% market signal uplift insufficient, affordable housing need underestimated, suppressed household formation not fully

investigated, conservative assumption of future job growth, fails to consider alternative forecasts and past trends.

- Failure to take account of growth from London, Luton and Milton Keynes.
- The evidence base is reflective of the O2C growth corridor (if only to a small degree) in terms of the economic and employment issues whilst remaining wholly silent in topic papers designed to address housing needs, site selection and the general overall housing strategy.
- SHMA takes insufficient account of the consequences of Brexit.
- At an average occupancy of, say, 4 people, 19,000 new homes would equate to 76,000 additional people (and this is just for Bedford Borough!) - why is it necessary, where are they coming from and where will they work? Employment opportunities exist more to the regions south of Bedford than to the north.

Development strategy

- Specific concerns about the options for allocations arising from the development strategy itself are summarised under the Questions 1-9.
- In respect of the development strategy overall some respondents consider that the strategy is overly focussed on housing and that there should be greater emphasis on employment and employment allocations.
- The Local Plan is not proposing to make any infrastructure related allocations.
- Infrastructure issues should be addressed before additional development is proposed.

Site selection methodology

Concerns about the site selection methodology include:

- Not enough regard given in the process given to loss of agricultural land.
- The methodology introduces the Agricultural Land Classification constraint at stage 4, when it should be earlier in the process as there is a very clear presumption in favour of resisting the loss of the best and most versatile agricultural land.
- Should include reference to the Marston Vale Surface Waters Plan.
- Site selection should take account of distance from Bedford.
- Natural England advise that the Marston Vale Great-crested Newt meta-population mapping project should be used within the evidence base to inform site assessment process.
- The methodology for assessing sites should have been published ahead of the Executive meeting where the consultation was agreed.
- The sites identified are not consistent in terms of the selection criteria e.g. sites included/excluded where there has been an appeal. It is also apparent that the site selection has taken little account of highway and transport matters – this is exacerbated in terms of the sites in Sharnbrook where the LPA clearly promote sites to the east of the village centre which would inevitably bring all (most) traffic through the village to the A6 – this makes absolutely no sense.

Landscape sensitivity study

- Landscape sensitivity study does not provide the level of clarity which would allow people to see precisely which landscapes and areas of the River Great Ouse and valley should be protected from development.
- Provides insufficient site-specific detail upon which to base decisions re sites and such decisions should instead only be informed by detailed site-specific landscape appraisals.

Renewable energy resource topic paper

- Concerns about the conclusion in the Renewable Energy Resources topic paper that broad areas in the north of the county, either side of the A6, are, in principle, suitable for large-scale onshore wind or solar power generation.

Economy and employment topic paper

- Conclusion that no further employment allocations are necessary is challenged by a number of respondents on the basis that the employment study should be interpreted differently in relation to matters such as the qualitative need for employment land, the likely take up of existing planning permissions and allocations and potential levels of demand.
- Question about the relationship between the 180Ha supply and what allowance has been made for footloose provision.

Education implications for local plan

- Specific concerns are raised about the need / justification for new schools in Bromham and Great Barford.
- Criticism that the paper ignores provision for secondary pupils and focusses entirely on state provision with only a passing reference to Roman Catholic or other faith schools and the Free School and no mention at all of independent schools.
- It is argued that where the scale of development proposed would only bring about the need for a one form entry school, it should be the Council that pays for the cost of the additional land required.
- The Education and Skills Funding Agency response suggests that the Council should consider emerging proposals for forward funding schools as part of large residential or mixed use developments.

Commercial leisure needs study

- Should look at wider leisure needs of the Borough including rural needs.

Hotel Futures

- Does not acknowledge the contribution which the rural area can make.

Retail study

- Disagreement with the study assumption that 32,203 sqm comparison space will come forward within the plan period on land which is unallocated and the assumption that Bedford's market share will remain unaltered.
- Additional allocations should be made within the Local Plan alongside criteria based policies which seek to guide additional growth. An allocation is specifically sought by Next at land west of B530.

New settlement assessment framework

- Concerns about the new settlement proposals themselves are summarised under the Question 1 relating specifically to whether a new settlement should form part of the development strategy. There were no substantial comments about the Council's assessment framework itself. There were some concerns about the clarity/complexity of some of the material submitted by the new settlement site promoters.

Rural settlement hierarchy Scoring

- Concern about classification of Wilstead as group 1 village and the definition of the village of Wymington as a Group 3 settlement. Should be classified as group 2.
- Concerns about weighting given to various services and facilities in the scoring.
- It is noted that the rural settlement hierarchy assesses the preferred sites of Salph End as group 3 and Gibraltar Corner as group 4. Salph End is recognised within the Council's Development Strategy as a rural community suitable only for 'limited development in appropriate locations'. Designating Salph End as an 'Urban Extension' both contradicts the assessment of the village as a 'Group 3 settlement.
- In the scoring weight should be given to the presence of a secondary school.
- Proximity to employment should be considered as part of the hierarchy. Journeys to work happen far more frequently than journeys to visit a GP or library. This is considered to be a flaw.
- A hierarchy that ignores the presence of a school does not reflect the reality of service provision, nor of the important community role played by village schools and the need for new housing to sustain them. A more sophisticated approach is needed that examines the capacity of each school and its ability to expand.

Sustainability appraisal

- Sites have not been assessed in groups (as well as on an individual basis) to inform decision-making. Assessing selected groups of sites against the Sustainability Criteria, would allow their cumulative impact to be assessed.

Local green spaces

- The Oakley NDP Group suggests revised definition for local green spaces.
- Council has interpreted the criteria on an overly strict basis

Question 12 was specifically about the new settlement proposals and our initial appraisal of the sites that have been put forward. Those responding were asked to tell us by answering Question 12 if they had any comments on the study “New Settlements Assessment Framework Methodology and Initial Site Assessment”. Having read the initial appraisal they were asked if they had a preference for which settlement(s) the Council should investigate further with a view to allocation.

Question 12 Specifically in relation to the new settlement proposals, do you have any comments on our initial appraisal of the sites that have been put forward, set out in the study “New Settlements Assessment Framework Methodology and Initial Site Assessment”? Having read the initial appraisal do you have a preference for which settlement(s) the Council should investigate further with a view to allocation?

470 responded

Highway capacity concerns

- A6 has no capacity for major growth. Junctions on to A6 are already a concern.
- Show stoppers should also be in the context considerations like transport accessibility. It is of concern that 2 of the new settlements are not close to any rail links – Twinwoods and Thurleigh.
- The borough council should have pursued a site that would take more advantage of the Cambridge-Bedford-Milton Keynes-Cambridge railway link in the east of the borough.
- There has been no detailed analysis of traffic flow (both car and HGV).
- Will add to pressures on Bedford railway station. There is already limited parking at the station and in nearby streets.
- Difficult to integrate a new settlement, together with its transport requirements, into the fine-grained landscape of north Bedfordshire successfully. Treating the assessment as a series of separate “scores” is only part of the process, as heritage, access and biodiversity need to be considered together.
- Consider also development in Northants.
- Most people will own/use a car therefore development of a new settlement will be unsustainable. Cambourne is evidence of that.

Detrimental impact on rural landscape and villages

- The new settlements are unlikely to be contained given the number of houses proposed. There is therefore a very real likelihood that the new settlements would encroach into existing villages in North Bedford to the detriment of the established rural landscape and historic and environmental context.
- No more than one of these three should be approved as the impact on the surrounding countryside, villages and infrastructure if more than one is built would be substantial
- The assessment of environmental impact has been limited to the new settlements themselves and not the wider area.
- Building new settlements in rural north Bedfordshire is not sustainable development.
- There will be a significant impact on the Great Ouse Valley and surrounding countryside as a result of this development.
- The proposal would erode very good quality farmland in north Bedfordshire.
- The light pollution would be significant.
- The proposed developments would have a negative effect on the surrounding areas, including the nature reserves between Felmersham and Sharnbrook which is rich in wildlife and flora.
- Area of Great Landscape Value (AGLV) is a policy that was extinguished some years ago, however I note the great efforts the LPA have made to carry forward some of the protections the AGLV offered. That said, however, there is a lack of clarity as to how the LPA has applied this, either sensibly or with sensitivity. If these settlements go ahead, each with their own infrastructure, then would there be any requirement to extend local villages.

- I am concerned to ensure that equestrian access is preserved and ideally enhanced by any such development. Currently it is possible to ride for good distances with relatively little road work. I am concerned that the development will force riders on to roads that will inevitably be much more busy with corresponding safety issues. There are a large number of horse riders in the area who value the existing network highly.
- The criterion as expressed in the table in the New Settlements Assessment document focuses entirely on the impact on existing rights of way whereas the provision of new rights of way should also be awarded high points, especially in areas where there is a lack of current provision.
- A water course runs between Tythe farm and the bungalows, with a number of protected fresh water clams, newts and stream life, which will also affect the nature reserve. Any disruption to the hedges and stream beds would have severe consequences to this stream and its inhabitants.
- Natural England - We advise that where no ALC information for the sites exists the Council should specify the need for those proposing sites to undertake a suitable site-specific ALC survey to inform the assessment process.

Agree to new settlement; however there are a number of important considerations

- The scenario of more than one new settlement should be carefully assessed in respect of the cumulative impact on infrastructure
- Given the magnitude of these developments the scale of the financial benefits accruing to both existing landowners and developers is such that the council should impose minimum development levels of in excess of 50% by 2035 as a pre-condition for granting planning permission to ensure that the housing requirements identified are delivered in a timely and sustainable manner, in return for accepting that a substantial profit will be made by land owners and developers in developing these sites.
- Each of the New Settlements, favouring brownfield initially, should be properly evaluated and considered. At least 2 should be brought forward now and work should continue on the others to ensure a viable development pipeline and to avoid the need in future to resort to proposals that serve only to satisfy short term targets while sacrificing long term sustainable planning principles.
- Focus on Lee Farm proposal and disregard Sharnbrook village as a group 1 village expansion consideration.
- Have a preference for Brownfield land eg at Thurleigh. However - some concerns about the loss of a runway of national significance.
- The council should concentrate on investigating further the sites at Twinwoods or Thurleigh; however the proposed scale of development at both of these sites is questionable and could be reduced by 50% if based on a more reliable assessment of housing need.
- Need to consider severance caused by A1 at Wyboston.

Potential Noise

- The noise from Santa Pod would make Lee Farm an unsuitable site for this development. This is a very serious technical matter which will be debated by experts, and allowing such a development could risk of legal challenge.
- Support proposal for Red Bull Racing to maintain its Wind Tunnel on site. However, need to consider noise impact on residential areas. The noise assessment included in the submission has taken readings of the tunnel noise around the perimeter during running times, however, it is not clear if the measurements were also taken at distances from the site whilst the tunnel was in operation. Also, cannot verify if at the time of the assessment the tunnel was running at full capacity, therefore question the methodology used as the basis for this assessment.

Consultation has not been conducted properly

- Should have had more consultation with affected local councils.
- Consultation deadline too short.
- Response form unwieldy.
- Too much technical information. Overwhelming.
- Need a simpler way to obtain views.
- The New Settlements Assessment was not completed before it was issued, making it more difficult for respondents to obtain an accurate view of each proposal.
- The land is mainly owned by three large farmers (being class 1 arable land) who have a vested interest in these plans going ahead.

- There needs to be a more inclusive consultation and the LPA need to include developers in order that stakeholders fully understand the aspirations arising from each and every site.
- Must be further consultation with residents as no analysis of the new settlements is included in this draft.
- The new settlement information provided is very provisional and as such it may be premature to proceed with a new settlement option on that basis.

Pressure on infrastructure and services

- The future of Bedford Hospital is uncertain and should certain of its services be closed, and the new settlements would put an immense strain on nearby hospitals. Similarly, doctor's surgeries are finding it difficult to recruit doctors, and the waiting time to see a doctor is around two weeks.
- Schools in the area are full and finding it difficult due to the shortage of teachers to employ and/or retain teaching staff.
- Services in St Neots already under pressure.
- Potential for green infrastructure to be maximised.

Alternatives

- Stewartby may be a better alternative because of its access onto the A421.
- The principle of a new settlement in this Local Plan is flawed. None of the alternatives are suitable for allocation. Instead we advocate that the Council introduces a new policy to allocate one or more "Areas of Search" which will allow the Council to undertake a separate exercise to identify the best location for one or more new settlements.
- The delivery of a new settlement is fraught with uncertainty and delay. As an alternative the growth of the main urban areas and Group 1 villages should be pursued.
- Housing should be distributed towards Wootton on the basis that it is a highly sustainable Group 1 settlement and any new development will make CIL contributions towards the provision of local infrastructure and ensure that development is directed towards the most sustainable settlements.
- None of the 'settlements' should be investigated further for allocation, particularly as there is a suitable and deliverable alternative to ensure that the housing needs of the Borough are met in a manner that is consistent with national policy, which has already been the subject of consultation (i.e. directing the 2,000 dwellings to the Group 2 villages (as consulted on in 2015)).
- New towns are not the right answer to the housing demand since smaller settlements will eventually be abandoned
- Cambourne is a good example to consider.
- New settlements do not offer a sustainable approach to the accommodation of growth requirements.
- Extensive developments are taking place e.g. Wixams, Shortstown, Great Denham, Kempston etc. Is such further development on the proposed scale necessary?

Deliverability

- A complex issue. Need to ensure that deliverability is fully investigated and addressed and that profitability will drive delivery.
- Flexibility will allow the Council to respond positively to any changes to delivery rates at new settlements and deliver further housing in the most sustainable locations in the Borough (outside of existing urban areas) if they are required to do so.
- Question deliverability of new settlements as a matter of principle.
- Question deliverability rates given performance at Wixams.