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1 Overview

1.1 The purpose of this document is to present information that corrects the Sustainability Appraisal Report that was published in September 2018. The Sustainability Appraisal Report accompanies the Bedford Local Plan for Submission, which was submitted to the Planning Inspectorate for examination in December 2018.

1.2 The changes to the Sustainability Appraisal Report and Appendices are summarised below.

1.3 Two representations are to be added to Appendix 5: Results of public consultation. These representations had been made in response to the consultation on the Plan for Submission and Sustainability Appraisal Report in January 2018 and had been omitted from Appendix 5 in error. The representations were made by:
   - Natural England.
   - David Lock on behalf of O & H Properties.

1.4 As a result of the consideration of responses in Appendix 5, consequential changes are to be made to the following parts of the Sustainability Appraisal Report:
   - Main document paragraphs 3.26 and 3.27.
   - Appendix 2: Baseline information.
   - Appendix 4: Sustainability appraisal framework.

1.5 None of the changes affects the findings or conclusions of the Sustainability Appraisal Report.
2 Changes to Appendix 5: Results of public consultation

2.1 Appendix 5 to the Sustainability Appraisal Report summarises the results of the consultation on the various sustainability appraisal documents that have been produced in connection with the local plan and sets out how the comments received have been taken into account. In response to the consultation on the Sustainability Appraisal Report, January 2018, Appendix 5 states that 13 responses had been received. This is to be changed to 15 responses. The table below sets out the two additional responses and any changes that need to be made to the Sustainability Appraisal Report and Appendices as a consequence

<table>
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<tr>
<th>Organisation</th>
<th>Comment</th>
<th>Response</th>
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<tr>
<td>Natural England</td>
<td>Natural England broadly supports the methodology used in the Sustainability Appraisal for the Bedford Borough Local Plan and is generally supportive of the proposed indicators for monitoring purposes, acknowledging with thanks the positive amendments made in line with our previous consultation response dated 16th June 2017 (Our reference: 213699). Paragraph 3.26 Table of Sustainability Issues. Under Water Resources, Air Quality and River Water Quality it is important that biodiversity is recognised and effects are not just considered. Protection and enhancement of biodiversity must be listed under the mitigation opportunities, along with a net gain in biodiversity. Groundwater quality and quantity should also be listed as a Sustainability Issue. Under Habitat Loss and Fragmentation, it should mention the avoidance, mitigation and compensation hierarchy as well as the protection, enhancement and creation of wildlife corridors and habitats to achieve net gain.</td>
<td>Noted. Paragraph 3.26, Table of sustainability issues. Water resources - amend to &quot;Water resources and groundwater&quot;. Add to Evidence &quot;Groundwater quality and quantity&quot;. Add to Mitigation opportunities &quot;Ensure that development does not adversely affect groundwater quality&quot;. Habitat loss and fragmentation - Replace Mitigation opportunities with &quot;Development should avoid significant harm to biodiversity if possible (through locating on an alternative site with less harmful impacts). Otherwise development should include mitigation or as a last resort compensation. -</td>
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</table>
Paragraph 3.27 The Local Plan also lists the following sites as being linked by a watercourse to the Bedford Local Plan area. These are missing from the SA report:
- Fenland SAC
- Eversden and Wimpole Woods SAC.

Paragraph 3.30, page 26  Objective 4 should be strengthened with the addition of the following wording:
Ensure current ecological networks are not compromised, and through the provision of excellent green infrastructure there is a net gain in biodiversity.
There are no objectives relating to agriculture or soils. We suggest an objective should be added such as Avoidance of the loss of best and most versatile agricultural land.

Appendix 4, page 83  Accepting that the data is not easily available, we reiterate advice given previously that instead of an indicator for the Number of planning application decisions referencing adopted green infrastructure policies, we advise a different set of indicators that reflect on the ground net gain in accessible natural greenspace such as:

Consider opportunities for the creation of wildlife corridors and habitats to achieve net gain”.

Paragraph 3.27 add “Fenland SAC, Eversden and Wimpole Woods SAC “.

SA Framework Objective 4. Disagree that the objective should be changed at this late stage when not previously raised by Natural England. However the additional words could be captured as a Headline Indicator to the SA Framework (Appendix 4). Add “Ecological networks and net gain in biodiversity”.
SA Framework Agriculture and soils. Disagree that this requires a separate SA Objective. It is considered to be covered under Objective 2 “Promote sustainable lifestyles, use resources efficiently, maximise recycling and re-use.” This issue was raised by Natural England in response to the 2017 consultation. As a result agricultural land quality was added to the scoring methodology within the SA Sites Report.

SA Framework Green infrastructure indicators. As previously noted, this data is not easily available. Nevertheless amend Appendix 4 by adding an additional indicator for Objective 4 “net gain in accessible green space”. Add data to Appendix 2.
- Hectares of accessible open space per 1000 population;
- Percentage of the borough population having access to a natural greenspace within 400m of their home.

Page 107 Natural Englands Impact Risk Zones dataset is as up-to-date as possible, but recreational pressure is a growing issue, so this is not always reflected in our IRZ mapping as yet. Please contact us to discuss this particular issue.

Appendix 10, page 155 Under the Assessment Criteria Agricultural Land Value, there should be a question relating to soils. We suggest the following:
Will the use of best and most versatile (BMV) agricultural land (i.e. that classified as Grades 1, 2 and 3a land within the Agricultural Land Classification (ALC) system) be avoided?

Appendix 10, page 156 Under the Assessment Criteria Nature conservation, including areas of special value, we suggest the following questions:
Will it deliver a net gain in biodiversity in the district, including features that will help wildlife adapt to climate change?
Will it provide opportunities for people to access the natural environment including green and blue infrastructure whilst protecting designated sites from the impacts of increased recreational pressure?

David Lock Associates on behalf of O & H Properties  The Sustainability Appraisal (SA) which supports the Regulation 19 Local Plan is a complex document and its conclusions and are not overtly clear and concise. O&H maintains a range of concerns in relation to the robustness of the SA and the conclusions drawn.

Impact Risk Zones. As noted in response to the 2017 consultation (Appendix 5), Impact Risk Zone data has been taken into account in the assessment of sites. If further information becomes available that might affect the assessment, this can be taken into account.

Appendix 10 has been deleted in the revised Sustainability Appraisal Report.

The Sustainability Appraisal Report has been reviewed and restructured to make it clearer.
Testing Options for the Amount of Housing Growth
Of significance, O&H also note that the Council has not tested an option for a higher level of housing growth than proposed by Draft Policy 3S within its Sustainability Appraisal. Justifying this decision, within the Sustainability Appraisal Report (January 2018), the Council indicates that this is because a higher level of growth is not a realistic option and as there is a lack of evidence to show that growth above its SHMA figure is required. This conclusion is questioned in the light of the housing need indicated through the application of the Standard Methodology which suggests that a substantially higher level of growth would be required in the Borough. It is therefore questioned if the SA has fully tested all reasonable alternative options.

As a result of the removal of the allocation at Colworth, the Sustainability Appraisal Report has been reviewed. The Report does consider the options of different amounts of growth, including higher levels of growth than Policy 3S.

Testing Options for the Distribution of Growth
Notwithstanding O&Hs comments above in relation to the extent to which the SA adequately tests a higher quantum of growth, the SA tests a comprehensive range of options for the distribution of growth including a range of scenarios focusing growth to new settlements, to Group 1 villages and Group 2 villages. This testing is set out within Appendix 8 of the SA. O&H is not convinced that the comparative assessment of various option scenarios conclusively demonstrate that there are any clear advantages for the preferred option over and above allocating further growth to Group 2 villages. On this basis, O&H consider that there is further opportunity to sustainably direct additional growth to Group 2 villages through the Spatial Strategy in line within its representations relating to draft Policies 2S and 3S.

The Sustainability Appraisal Report shows that higher growth options in Group 2 settlements only perform comparatively well where the scenarios do not include new settlements yet do include growth in and around the urban area. It is therefore the effect of new settlements which has the greater effect.

Sustainability Appraisal of Land East of Broadmead Farm
O&Hs land interests at Land East of Broadmead Farm (site 273) has been considered within the SA. The assessment of Land East of Broadmead Farm set out within the Sustainability Appraisal of Sites (January 2018) is heavily influenced by a consideration of its In relation to Site 273, the site currently does not have local services and public transport within walking distance.
accessibility to existing public transport services and facilities. The site is located approximately 1.5 km of Stewartby Railway Station providing regular services to Bedford and Milton Keynes (via Bletchley) which are key employment and service locations. If developed as a proposed extension to the recently developed Stewartby Park Site Land east of Broadmead Farm would likely benefit from comparative levels of walking and cycling accessibility to Stewartby Railway Station.

In relation to services and facilities at Stewartby, the assessment undertaken does not allow for a consideration of the step change in provision in Stewartby which will arise through the delivery of the proposed Former Stewartby Brickworks allocation which would support further development in Stewartby. On this basis, O&H does not consider that the assessment of Land East of Broadmead Farm within the SA is robust and reflective of the sustainability of the site.

| It is premature to conjecture what facilities might be included within the Stewartby brickworks site when it is redeveloped. |  |
3 Consequential changes as a result of changes to Appendix 5

3.1 As a result of the public consultation responses listed above which amend Appendix 5, the following consequential changes are to be made to the Sustainability Appraisal Report and Appendices.

Changes to Sustainability Appraisal Report main document

3.2 Make the following changes to paragraph 3.26, Table of sustainability issues.

Water resources – amend to "Water resources and groundwater". Add to Evidence " • Groundwater quality and quantity." Add to Mitigation opportunities " • Ensure that development does not adversely affect groundwater quality."

Habitat loss and fragmentation – replace entry for Mitigation opportunities with " • Development should avoid significant harm to biodiversity if possible (through locating on an alternative site with less harmful impacts). Otherwise development should include mitigation or as a last resort compensation. • Consider opportunities for the creation of wildlife corridors and habitats to achieve net gain."

3.3 Make the following change to paragraph 3.27. Add " • Fenland SAC, Eversden and Wimpole Woods SAC ".

Changes to Appendix 2: Baseline information

3.4 Make the following change to the table of Sustainability Appraisal Framework Indicators.

In the section of Environmental Sustainability Appraisal Framework Indicators, insert two new rows below “Number of planning application decisions referencing adopted green infrastructure policies” as follows:
<table>
<thead>
<tr>
<th>Indicator</th>
<th>Local Data</th>
<th>Comparators and targets</th>
<th>Trend</th>
<th>Local context and issues</th>
<th>Data source</th>
</tr>
</thead>
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<tr>
<td>Hectares of accessible open space per 1000 population</td>
<td>Bedford Borough Open Space, Sport and Recreation Study 2007 Parks and gardens 1.12ha/1000 Accessible natural green space 3.48ha/1000 Outdoor play provision – n/a Informal amenity 0.98ha/1000 Outdoor sports space – n/a Allotments 0.32ha/1000 NB figures only include BBC managed land; other accessible open space is managed by parish councils, schools or other organisations.</td>
<td>Target in Allocations &amp; Designations Local Plan 2013 Parks and gardens 0.5ha/1000 Accessible natural green space 0.5ha/1000 Outdoor play provision 0.25ha/1000 Informal amenity 0.5ha/1000 Outdoor sports space – various Allotments 0.35ha/1000</td>
<td>n/a</td>
<td>ensure that new development provides accessible open space</td>
<td>BBC</td>
</tr>
<tr>
<td>Percentage of the borough population having access to a natural greenspace within 400m of their home</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>opportunity to increase accessibility of open space, particularly in areas of deficiency</td>
<td>n/a</td>
</tr>
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Changes to Appendix 4: Sustainability appraisal framework

3.5 Make the following changes to the sustainability appraisal framework.

For objective 4 (Create, conserve, protect and enhance the borough’s natural features, distinctive local environments, habitats and species) replace Headline indicator with "Ecological networks and net gain in biodiversity".
For objective 4 (Create, conserve, protect and enhance the borough’s natural features, distinctive local environments, habitats and species), under Detailed Indicator heading, add after “Number of planning application decisions referencing adopted green infrastructure policies”, “Net gain in accessible green space”.