

RECORD OF EXECUTIVE DECISION TAKEN BY AN EXECUTIVE MEMBER OR OFFICER

This form can be used for any decision but **MUST** be used to record:

- any decision taken by the Elected Mayor or an individual Councillor
- a key decision taken by a Council Officer

In these circumstances the form must be completed and passed to the Service Manager (Members' Services) no later than NOON on the second working day after the day on which the decision is taken. No action may be taken to implement the decision(s) recorded on this form until 7 days have passed and the Service Manager (Members' Services) has confirmed the decision has not been called in.

1. Description of decision

To agree the comments set out in the report and at Appendix A to EERA as the Council's advice on the review of the East of England Plan.

2. Date of decision

20 MARCH 2009

3. Reasons for decision

To ensure that EERA receives the Council's advice on the East of England Plan review.

4. Alternatives considered and rejected

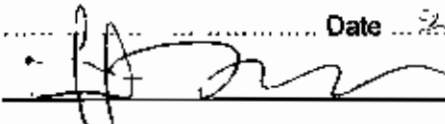
None

5. How decision is to be funded

From existing budgets.

6. Conflicts of interest

	Did Standards Committee give a dispensation for that conflict of interest? (if yes give details and date of dispensation)
None	

Signed  Date 20-03-2009
 Name of Decision Taker THE M.A.C.

[This must be signed by the decision-maker or, if the decision was made by the Mayor or Councillor then the relevant Head of Service may sign it].

This is a public document. A copy of it must be given to the Service Manager (Members' Services) as soon as it is completed.

Date decision published: 20.3.09
 Date decision can be implemented if not called in: 1.4.09

REPORT TO THE MAYOR

REPORT BY THE ACTING HEAD OF PLANNING & HOUSING SERVICES

SUBJECT: Review of the East of England Plan – Advice to the East of England Regional Assembly (EERA)

1. EXECUTIVE SUMMARY

The East of England Plan (also known as the Regional Spatial Strategy (RSS)) is being reviewed to identify growth requirements up to 2031 and beyond. The East of England Regional Assembly (EERA) is seeking views on four different growth options. This report sets out an initial response and highlights concerns about the scale and deliverability of housing and job growth proposed. The Council's response will be forwarded to EERA for consideration in the drafting of the revised plan.

2. RECOMMENDATION

i) That the comments set out in the report and at Appendix A be agreed as the Council's response to EERA's request for advice on the review of the East of England Plan .

3. REASONS FOR RECOMMENDATIONS

To ensure that the Council's views on the East of England Plan Review be submitted to EERA by the deadline.

4. KEY ISSUES

Resource

There are no significant financial or staffing implications associated with this decision.

Legal

The review will revise and extend the timeframe of the East of England Plan approved in May 2008.

Social, Economic and Environmental Wellbeing

As context to the request for advice EERA identifies a number of issues facing the region which include climate change and social, economic, demographic and technical change.

Risk

Failure to respond to the consultation means that the Council will have missed an opportunity to influence the content of the East of England Plan review.

Policy

When finally approved the East of England Plan review will provide the regional planning framework to 2031.

5. DETAILS

The East of England Plan (also known as the Regional Spatial Strategy (RSS)) is being reviewed. The key objective of the review identified in EERA's project plan (July 2008) is **"to identify the appropriate development strategy for the region for the period 2011-2031, with a longer term view to 2050,"** EERA has identified that integral to the objective is the need to ensure:

- the region's ability to deliver growth in a sustainable way has been fully investigated through testing alternative levels of growth and options for its spatial distribution, and by sustainability appraisal;
- the strategy addresses the challenge of climate change and its impact on, among other things, flooding, infrastructure (existing and future investment), habitat change and food security;
- the appropriate range and scale of infrastructure needed to support the strategy has been identified; and the strategy, in applying the national policy, reflects the East of England's particular circumstances and characteristics.

The Project Plan has eight broad stages. These are:

- Stage 1 – Prepare and consult on project plan, public participation statement and commence integrated sustainability appraisal (May to September 2008);
- Stage 2 – Develop evidence base and commission technical studies (May 2008-early 2009);
- Stage 3 – Prepare development options and consult (January to July 2009);
- Stage 4 – Prepare a draft revised regional spatial strategy (August to December 2009);
- Stage 5 – Approve and submit draft regional spatial strategy (By end of 2009);
- Stage 6 – Test the draft regional spatial strategy – consultation and Examination in Public;
- Stage 7 – Government publishes and consults on its proposed changes following the Examination;
- Stage 8 – Publication of the new Regional Strategy (By end 2010)

Stages 1-5 are overseen by the East of England Regional Assembly. Stages 6-8 by Government.

The process is currently at Stage 2. As part of this the East of England Regional Assembly has issued a formal request for advice from the Strategic Authorities (i.e. SA or Section 4(4) authorities). As of 28th November 2008 Bedford Borough became a Strategic Authority (in anticipation of the Borough becoming a unitary authority in April 2009).

The existing East of England Plan established a framework for development within the Region up to the year 2021 and this now needs to be extended up to 2031. As part of this process EERA intends to integrate the Milton Keynes and South Midlands Sub Regional Strategy (MKSMSRS) growth areas within the East of England Plan review.

The roll forward to 2031 also needs to respond to recently published Government housing growth scenarios produced by the National Housing and Planning Advice Unit (NHPAU).

EERA's request for advice covers a range of detailed matters which are set out in full in Appendix A. A central part of the advice is EERA's request that the following four development scenarios be tested. See Appendix B for a full description of the scenarios

- GVA growth (Gross Value Added - GVA measures the contribution to the economy of each individual producer, industry or sector in the United Kingdom).
- Current regional housing target to 2021 (policy H1), taking into account remaining houses to build to 2021 pro rata target to 2031;
- NHPAU lower level target (addressing house prices affordability);
- NHPAU upper level target; and

The four scenarios as they relate to Bedford Borough are set out below (Table 1). The scenarios show figures for future housing provision in the period 2007-2031 ranging from approximately 21,000 to 32,000 dwellings.

It is important to note that whichever scenario is taken up as the new requirement figure completions and commitments since 2001 will count towards meeting this requirement leaving a residual requirement to be identified. As at 31 March 2008 completions and commitments stand at 14,335. This means for example that the residual requirement under the "lower End Scenario" would be 6,667 ($21,002 - 14,335 = 6,667$)

Table 1 also illustrates something of the "reality" of each of the scenarios by comparing the annual development rates which would be required compared to the rates actually achieved over a number of time periods. For example whilst average completions have been 592 over the period 2001-7, the EERA scenarios would require a range in annual rates of between 875 and 1,342 dwelling completions per annum – a significant increase compared to previous rates.

Table 1

Bedford Borough Housing Scenarios	Total Dwellings 2007-31	Annual rate 2007-31	Residual requirement 2008/9 - 2030/31
Lower End Scenario (GVA growth)	21,002	875	6,667
RSS taking account residual	23,915	996	9,580
NHPAU lower	26,019	1,084	11,684
Upper End Scenario (NHPAU upper)	32,218	1,342	17,883
Existing RSS rolled forward	21,096	879	
Natural increase (nil net migration)	11,904	496	
Average completions 2001-7		592	
Average completions 1991-2007		608	

Each scenario also has a job figure associated with it as shown below. The first two scenarios assume job provision at or just below recent rates (as measured by the Annual Business Inquiry Survey).

Table 2

Bedford Borough Employment Scenarios	Total Employment 2007-31	Annual rate 2007-31
Lower End Scenario (GVA growth)	20,352	848
RSS taking account residual	21,528	897
NHPAU lower	23,448	977
Upper End Scenario (NHPAU upper)	29,136	1,214
Existing RSS rolled forward	19,200	800
Average annual job growth 2001-7	5,600	900

A crucial part of this stage in the process is for the Strategic Authorities to test the ability of their areas to accommodate the growth levels required to meet each scenario.

Bedfordshire County Council (who, as the former SA has been leading on this work) held a number of workshops to identify what potential capacity (beyond existing commitments) there was to meet the four scenarios.

This process identified potential additional capacity of 5,544 dwellings for Bedford Borough. When added to existing commitments this gives a total number of dwellings of 19,879.

Table 3

Bedford Borough	
Completions 1/4/07-31/3/08	631
Commitments from 1/4/08	13,704
Total	14,335
Possible capacity beyond commitments	5,544
Total	19,879

It is important to note that this assessment represents our initial conclusions at this stage. There are two reasons for this:

- The timescale for the response to such complex issues is very tight. In Bedfordshire's case the problems over this have been exacerbated by the additional pressures emanating from local government re-organisation.
- The timeframe for the provision of assessments of the four scenarios is particularly ambitious and has limited the ability for wider engagement.

Table 3 shows a potential capacity of 19,879 dwellings. This figure is just below the lowest of the four scenarios.

Potential for meeting the higher level scenarios

Across the region there is a consensus that the higher level scenarios are completely unacceptable in sustainability, quality and deliverability terms. There is a particular concern about the ability to generate sufficient job growth on a countywide basis for even the lowest scenario. In the Borough's case past performance (in the period 2001-6) has shown that job growth would be consistent with the lowest two growth scenarios (see Table 2). It should be noted that the period 2001-6 was the most successful for job growth in recent history and maintaining this level will be challenging.

It is extremely doubtful that the number of jobs will increase sufficiently to meet the annual rates required by the two highest growth scenarios. Experience has shown that without a strong local economy, housing completions have historically lagged behind annual housing targets.

The current spatial strategy for the Borough contains two distinct policy areas – the growth area (Bedford, Kempston and the northern Marston Vale), and the rural policy area which covers the remainder. The joint technical work carried out for this review has suggested that this continues to be the most sustainable approach to meeting future development needs and represents the most appropriate response to the critical issues of climate change, the emphasis on the regeneration of the growth area, wider technological, economic and demographic change and the very real challenges presented by the growth requirements of the current RSS.

Seen from the air, the entire Marston Vale is an area of massive despoliation due to a century or more of clay diggings to feed the many brickworks which once pockmarked the area. Significant development has already been allocated such as the Wixams and further growth to meet the scenarios being tested by EERA will require large scale infrastructure to deliver it.

The key to sustainable growth is the provision of local jobs, otherwise housing growth, even at the lowest level being tested, will translate into more wasteful commuting and disproportionately high investment in more highway construction.

Projects such as Nirah as well as high tech industry would provide jobs which would reduce the need for commuting. Commitment to a development of this type would certainly attract jobs (especially in the green industries) and people to the wider Marston Vale.

Whatever the level of additional housing provision and jobs, green infrastructure is essential (including substantial landscaping around the worked-out brickpits) with linkages to the Bedford - Milton Keynes canal project which has potential to become a 'Bedfordshire Broads' complex.

Where growth occurs, modern innovative transport technologies such as Maglev (providing a network between local towns, Bedford, Milton Keynes, Luton and, perhaps, Biggleswade [connecting with the east coast mainline]) need to be identified, explored and funded. These would provide silent high speed local transport to link with commuter lines and shopping centres, schools and medical facilities and aid a modal shift towards public transport.

Preliminary work has indicated that if the higher growth scenarios were to be taken forward the growth area as currently defined would not have the capacity to accommodate them.

The key points to make to EERA, drawing on the detailed responses set out in Appendix A are therefore:-

- Initial assessments of potential capacity indicate that this is just below the lowest growth scenario. It is unlikely that the two higher growth scenarios could be accommodated within the existing growth area.
- The levels of job growth achieved in the period 2001-6 would be consistent with the lowest two growth scenarios however maintaining

these rates in the future will be challenging. It is extremely doubtful that the number of jobs will increase sufficiently to meet the annual rates required by the two highest growth scenarios.

- In the case of infrastructure requirements, further work will be needed to underpin confidence that growth can be delivered at the lowest level.
- EERA has commissioned consultants to look at the potential for identifying regional scale settlements of 20,000 new dwellings or more. Three potential sites have been identified including an extension to the proposed Marston Vale eco-town. Promoters O&H have subsequently withdrawn from the Government's eco-town selection process, but have indicated that the proposal will be pursued through the RSS review process. The Executive has already expressed a number of concerns about the Government's draft Planning Policy Statement on eco-towns including the proposed standards for the number of jobs to be created in the eco-town and the impact on delivering existing growth requirements. These concerns equally apply to the two further locations identified by the consultants.

Next stages

Following the submission of this advice and further technical work by EERA there will be a consultation on development options. This is likely to take place in the Autumn. This will also allow any differences between EERA and the SAs to be highlighted. The consultation will also include any proposed revisions to topic based generic policies. At that and further stages there will be the opportunity to comment and make representations

6. Summary of Consultations and Outcome

Planning Portfolio Holder

7. Ward Councillor Views

Not applicable for this report.

Report contact officer: Carolyn Barnes

File reference:

Previous relevant minutes(s):

Background papers:

Appendices: A - Schedule of detailed comments

ISSUES ON WHICH EERA IS SEEKING ADVICE.

A response to the specific advice requested is considered below under each of the headings numbered i-xii provided by EERA.

- i. **Auditable consultation and facilitation with all relevant authorities, sub-regions and stakeholders. Auditable in this case means the SA's are satisfied they can readily find evidence to support any policy stance. The relevance of bodies to be consulted needs to be determined by the SA's but would include all districts / boroughs in two tier areas. SA's should go through EERA if they seek work to be commissioned from public regional or national authorities;**

Joint working

At the time when the request for advice was issued Bedfordshire County Council was the Strategic or 4(4) Authority. The County Council therefore took the lead in coordinating advice across the County which resulted in joint working between officers from each of the districts and Luton. Three workshops took place with the aim of ensuring consistency across the county. A representative from the Environment Agency was able to attend a County wide workshop which allowed issues of infrastructure and environmental concerns to be raised. Consultation was also undertaken with the highway authorities (Luton and Bedfordshire County Council) to ensure major transport concerns have been identified

Consultation

In response to a request from EERA Bedfordshire County Council contacted key stakeholders within their area. Letters were sent to key stakeholders informing them of the review of the RSS and to explain that there will be opportunities for them to participate at future stages in the process. In addition, an article was published in the January edition of 'We Love Bedfordshire' magazine to inform the general public.

- ii. **Assessment and advice on EERA's Call for Development Proposals. SA's will receive responses from applicants to the above call. EERA would like information on how this call has assisted district level allocations. EERA would also request that SA's monitor the progress of these applications at least until the EiP in order to assist the soundness of the RSS;**

In order to allow early consideration of potential development sites and to inform the review, EERA issued a 'Call for Proposals' inviting developers to propose opportunities for new settlements and urban extensions of between 2,000 and 20,000 dwellings. It was stressed that submitting a proposal through this process did not indicate that it would be allocated, obtain planning permission or have the principle for the development established.

The Council is familiar with all of the sites proposed as they have all been submitted in response to the Council's own call for sites for its forthcoming Allocations and Designations DPD. The sites are listed below (and shown on Map 1) along with a comparison of the capacities proposed as part of the Allocations and Designations process and some initial comments.

Site	Promoter	East of England Plan review	Allocations and Designations DPD
Stewartby Brickworks East	Hanson/Hives Planning	1200	600
Stewartby Brickworks West	Hanson/Hives Planning		600
Kempston Hardwick North	Hanson/Hives Planning	1640	2300
Broadmead	Hanson/Hives Planning	2124	
Quest Pit	Hanson/Hives Planning	1150 (only part in Bedford Borough)	No figure specified
Wixam northern expansion area	Gallagher Estates/O&H	1400	1400

Stewartby Brickworks (east and west of the railway line)

The sites at Stewartby are currently the subject of a planning application for 1200 dwellings. The development would require the demolition of listed brick kilns and chimneys (also the subject of a planning application) and employment land west of the Bedford Bletchley line. Loss of employment use would be contrary to current planning policy.

Kempston Hardwick north and Broadmead

As can be seen from the table there is some discrepancy between the estimated development capacities proposed in the two submissions indicating that further work needs to be undertaken to establish a potential capacity for the sites. It should be noted that approximately 50% of the site proposed lies within flood zone 3. The sites also formed part of the O&H Marston Vale eco-town proposal.

Quest Pit

Only a small part of the site is in Bedford Borough (the remainder being in Mid Bedfordshire). The site has planning permission for the NIRAH development and the submission received by the Council makes clear that residential development would only be sought if the NIRAH project does not go ahead.

Wixams Northern Expansion

The northern expansion area was identified in part in the original development brief for Elstow Storage Depot (the Wixams) as employment land and no

formal consideration has been given to the use of this land for residential purposes.

As can be seen from the above there are currently considerable uncertainties about the suitability of the proposed sites for development. The potential of these sites will be tested in detail through the Allocations and Designations process (and in the case of the Stewartby sites through the planning application process). This work will further inform the Council's advice to EERA as the East of England process continues.

iii. EERA's commission for Regional Scale Settlements will be presented to SA fora and SA's will be able to respond to any proposals affecting their interests. SA's can reflect this in their initial advice to EERA, in the development of options and on-going through the review and monitoring of the RSS.

As part of the review of the East of England Plan to 2031, the East of England Regional Assembly (EERA) commissioned consultants (ARUP) to undertake a study to look at the feasibility of identifying a large new settlement(s) / major urban extension(s) of 20,000 or more dwellings within the region.

The full report may be viewed on the EERA website www.eera.gov.uk however the study will not be subject to a consultation process.

Six potential locations within the region have been identified as having the potential to accommodate 20,000 or more dwellings, three of which are within Bedfordshire. These locations are:

- The A5120/Midland Main Line corridor, as extensions to existing settlements (i.e. Ampthill, Flitwick, Westoning, or Harlington);
- The East Bedfordshire Strategic Corridor (the A1/East Coast Main Line corridor), as extensions to existing settlements (i.e. Sandy, Biggleswade, Church End/Stotfold/Arlesley), building upon the growth allocated in the Mid Bedfordshire Local Plan; and
- The A421/Bedford-Bletchley rail corridor, as intensification of the Marston Eco-Town, helping to establish a self-sustaining urban corridor linking Bedford and Milton Keynes.

The study also identifies a range of centres (key centres for development and change) which in combination could accommodate significant levels of growth. Bedford/Kempston/Northern Marston Vale and Luton/Dunstable /Houghton Regis/ Leighton Linlode growth areas are noted as already having significant levels of growth allocated to them and having little capacity to accommodate any more.

Whilst officers have been informed of the work's progress, they have had limited opportunity to comment on the methodology of the study and the conclusions drawn. The study raises a number of concerns i.e. that:

- The overall level of growth for Bedfordshire is undeliverable and unnecessary.
- The locations would not be sustainable – ARUP conclude that the A5120 Midland Mainline corridor and A1 East Coast Mainline corridor locations would more than likely become dormitory towns with most people commuting out.
- Development of such a scale would divert growth and investment away from existing urban areas which require regeneration.
- There would be a risk of the coalescence of settlements
- The impact on the local environment would be considerable.

The Executive has already expressed a number of concerns about the Government's draft Planning Policy Statement on eco-towns including the proposed standards for the number of jobs to be created in the eco-town and the impact on delivering existing growth requirements. These concerns equally apply to the two further locations identified by the consultants.

In their report ARUP conclude that:

“none of the three potential locations identified within the Bedfordshire and Luton sub-region appear to be ideal for a regional scale settlement. While there are excellent opportunities to build upon existing infrastructure at each location (in particular strategic transport networks), each has limitations, in particular in terms of economic drivers. A new settlement within Bedfordshire and Luton is unlikely to generate the level of employment required for the settlement to be self-sufficient and therefore would risk becoming a dormitory town, whose inhabitants are reliant on job opportunities elsewhere.

Furthermore, the cumulative effect of diverting investment priority (particularly new east-west transport measures) and development industry capacity away from the existing growth and regeneration areas, potentially putting their delivery at risk, needs to be considered. It is therefore recommended that these three potential locations are considered only as possible alternatives to the locations identified in other sub-regions.”

It is important to note that this ARUP study is one of the many inputs to the review of the East of England Plan that EERA will be taking into account when they produce the next stages of the plan review. The locations identified by ARUP are therefore potential options for accommodating future growth in the Region.

It is anticipated that EERA will publish their draft development scenarios and options for the Region later this year when it will be clearer which, if any, of the regional scale settlement options they will propose. At that and further stages there will be the opportunity to comment and make representations

- iv. **District distribution of housing and job figures up to 2031 with determination of whether this provision is district wide or tied to Key Centres for Development and Change (KCDCs) ;**
- v. **Testing the ranges of housing as required by the Regional Planning Panel and the Department of Communities and Local Government and the employment range provided through EERA/EEDA. The SA ranges are set out in more detail in Appendix B.**

In this case issues iv and v are considered together.

The East of England Plan identifies Bedford/Kempston and the northern Marston Vale as a Key Centre for Development and Change reflecting the previously approved Milton Keynes and South Midlands Sub-Regional Strategy (MKSM SRS) whose focus is the urban renaissance of Bedford and Kempston coupled with significantly increased delivery of new housing, economic development and new jobs and the continued regeneration of the Marston Vale.

The East of England Plan and the Council's subsequently adopted Core Strategy and Rural Issues Plan draws a clear policy distinction between the Bedford growth area where the majority of new development is to be focused (16,270 dwellings) and the residual rural area where development levels will be more modest (1300 dwellings). They are therefore discrete policy areas and represent a spatial strategy which focuses on the regeneration of the urban area and the Marston Vale. Whilst the EERA scenarios have been presented on a Borough wide basis it is worth considering the implications for both policy areas. This is set out in the following table.

Bedford Borough Housing Scenarios	Total dwellings 2007-31	Annual rate 2007-31			Residual requirement 2008/9 - 2030/31
		Growth Area	Rural Policy Area	Total	
Lower End Scenario (GVA growth)	21,002	19,448	1,554	875	6,667
RSS taking account residual	23,915	22,145	1,770	996	9,580
NHPAU lower	26,019	24,094	1,925	1,084	11,684
Upper End Scenario (NHPAU upper)	32,218	29,834	2,384	1,342	17,883
Existing RSS	21,096			879	

rolled forward					
Natural increase (nil net migration)	11,904			496	
Average completions 2001- 7				592	
Average completions 1991- 2007				608	

This shows that when each of the growth scenarios are applied, the majority of the development will continue to be provided within the growth area. Table 3 shows an initial assessment of a potential capacity (19,879 dwellings which provides a figure which is just below the lowest of the four scenarios. Preliminary work has indicated that if the higher growth scenarios were to be taken forward the growth area as currently defined would not have the capacity to accommodate these.

Implications for dwelling requirements

The current RSS rate rolled forward requires 879 dwellings per annum (DPA), compared to an actual rate achieved 2001-2007 of 592. The upper two scenarios for Bedford Borough would require a 23-53% increase above the current RSS rate and more than twice the rate of annual average completions 2001-2007. Whilst the lowest scenario is similar to the current RSS rate, the next lowest scenario would require an increase of 13% above the recent completion rate.

Implications for job requirements

The current RSS identifies a target of 50,000 jobs across the County for the period 2001-2021. Reflecting the dwelling requirement of 59,100 over the same period indicates a job to dwelling ratio of about 0.91:1 for Bedford Borough. Examining the job to dwelling ratio resulting from a comparison of the employment and housing growth in the scenarios being tested for the East of England Plan Review suggests a ratio closer to 1:1. The only exception being the GVA growth scenario which as an employment led growth scenario, has a ratio of around 1.3:1

The current RSS rate rolled forward requires 800 jobs pa, compared to an actual rate achieved 2001-2007 of 900. The upper two scenarios for Bedford Borough would require a 22-52% increase above the current RSS target and 9% - 35% above what has recently been achieved annually (2001-2007). Whilst the lowest scenario is similar to the current RSS target, the next lowest scenario is some 12% higher and equal to what has recently been achieved annually (2001-2007).

It should be noted that the period 2001-6 was the most successful for job growth in recent history and maintaining this level will be challenging. It is extremely doubtful that the number of jobs will increase sufficiently to meet the annual rates required by the two highest growth scenarios.

vi. Consideration if rolling forward any existing policy/policies unchanged is credible;

The existing East of England Plan is up-to-date and therefore policy changes are unlikely to be anything more than reflecting the emerging national policy (e.g. climate change), and LDFs/core strategies until the regional spatial strategy growth requirements become clearer. Changes to policies at this stage are considered to be premature and will need to be considered as the process progresses.

With the planned integration of MKSMSRS into the RSS there will be a need to consider any consequential policy changes elsewhere in the strategy.

vii. Assessment and technical advice on the need for and boundaries of policy specific sub-regions, sub areas and any new growth designation;

The RSS review should incorporate the Bedford growth area section of Part B of the MKSM SRS as sub regional guidance. The key priorities set out in para. 75 of the MKSM Part B should be included in the RSS review. In addition specific infrastructure advice should be included to ensure that growth is accompanied by appropriate infrastructure.

Bedford ,Kempston and the northern Marston Vale should continue to be identified as a Key Centre for Development and Change.

No other sub region specific designations are necessary at this time.

viii. Taking the lead as appropriate in other sub-regional/area tasks including: intra and inter regional boundary implications of allocations and ensuring integration of land use planning and transport at those levels;

There are a number of cross boundary issues that will need to be addressed by the new unitary authorities. These are:

- Involvement with the consortium promoting the E-W Rail project.
- Joint working with neighbouring authorities and other stakeholders in relation to sub regional green infrastructure provision including the Bedford to Milton Keynes Waterway and the Nene Valley Regional Park.

ix. Documenting the suggested spatial patterns, forms of development and growth considerations that the SA has considered in its initial and on-going advice to EERA;

This is an on-going and iterative process. However, as seen from comments under iv, v and vi above, the initial view is that the level of sustainable growth

that can be realistically accommodated can be achieved on the basis of the current spatial strategy.

- x. **To be explicit about the infrastructure requirements needed for the scenarios and locations of development including identifying any 'show-stoppers';**

Work is currently underway to identify infrastructure requirements to deliver existing growth requirements. In terms of additional growth, infrastructure assessment models are being developed by the statutory agencies covering road, rail, flood risk, water supply and sewage treatment and these will be used by EERA to inform the development options they put forward for consultation. It is important that such assessments are founded on robust assumptions so that the true impact of development levels is assessed.

Experience has shown that assessments made at a high level initially unravel when more detailed assessments are made. An example of this is when more detailed highway modelling is carried out at an individual site level to determine impact on the strategic road network and results contradict earlier assumptions that highway capacity was available to accommodate levels of growth.

- x. **Assistance with information provision and any commentary on the Integrated Sustainability Appraisal;**

The ISA has been used to provide a framework for assessment of spatial options.

- xi. **To provide advice on matters as national policy emerges such as the RSS's role in the Community Infrastructure Levy and the current Planning Bill.**

The Executive has agreed a consultation response to the draft PPS on eco-towns and it proposed that this be forwarded to EERA so that they are aware of the Council's concerns about the relationship between the eco-town selection process and the emerging RSS review.

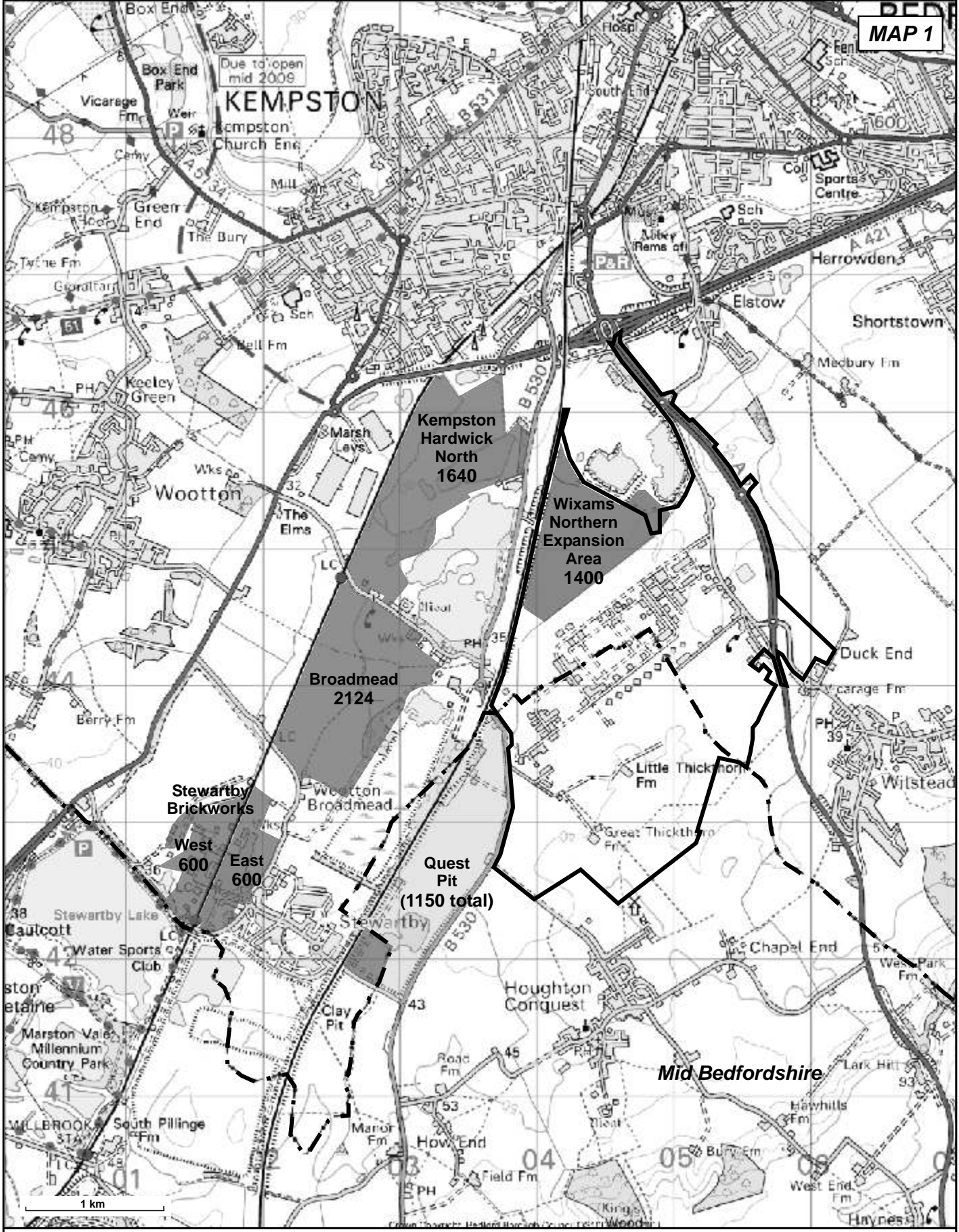
RSS GROWTH SCENARIOS TO BE TESTED

1. RSS policy H1 taking into account 2006-2021 residual 26,998 dwellings per annum. This takes the policy H1 residual target of 26,830 dwellings per annum 2006-31 and applies the advice to plan for housing provision post-2021 based on the 2001- 21 annual net additions rate or the 2006- 21 annual rate, whichever is higher. Overall, this produces a rate of 26,998 dwellings per annum from 2006 to 2031. In producing the scenario, the model targets dwelling stock at 2031 and hence the 2021 dwelling stock will only be approximate.


2. NHPAU Lower 2008-26 30,600 dwellings per annum This is based on the NHPAU's advice on average annual net additions to the housing stock between 2008 and 2026. The bottom of the supply range is based on annual net additions required to meet government targets for the supply of new homes. The scenario applies this level of increase up to 2031. The regional target has been allocated to districts pro-rata using apportioned policy H1 targets.




3. NHPAU Upper 2008-26 39,200 dwellings per annum. This is based on the NHPAU's advice on average annual net additions to the housing stock between 2008 and 2026. The upper end of the supply range is based on the annual net additions required to stabilise the national lower quartile house price to earnings ratio at the level it was in the first quarter of 2007. The scenario applies this level of increase up to 2031. The regional target has been allocated to districts pro-rata using apportioned policy H1 targets.

4. GVA Growth 2008-31 2.3% GVA per head and 2.1% GVA per employee per annum growth This scenario projects the impact on employment rates, population growth and housing demand of levels of productivity growth consistent with Regional Economic Strategy targets. The targets in the RES were agreed regionally and were the levels of productivity growth that were consistent with the housing targets set out in the RSS, as at February 2008. In light of the recent economic downturn, the scale of the challenge in meeting these productivity targets has increased. Extra assumptions have therefore been incorporated into this scenario to generate, and model the impacts of, higher levels of productivity growth. The scenario uses assumptions for generating higher levels of productivity similar to those in the 'P2 scenario' generated for the consultation draft of the RES1. This scenario assumed that additional jobs were attracted into the region in a limited number of sectors in which GVA per employee was above the regional average. It also assumed that GVA per employee could be raised within existing firms across the region in a limited.



EERA
Call for Proposals Submissions

 Bedford Borough Boundary

-  Submitted sites within Bedford Borough
-  Submitted sites outside Bedford Borough
-  Proposed boundary of Wixams