



Appeal Decision

Inquiry Held on 12-15 November 2019 and 21-22 November 2019.

Site visits made on 11, 20 and 21 November 2019.

by Christopher Butler BA(Hons) PG Dip TP MRTPI

an Inspector appointed by the Secretary of State

Decision date: 9th January 2020

Appeal Ref: APP/K0235/W/19/3234032

Land to the west of Odell Road, Harrold

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for outline planning permission.
- The appeal is made by Catesby Promotions Limited against Bedford Borough Council.
- The application Ref 19/00842/MAO, is dated 11 April 2019.
- The development proposed is the demolition of existing agricultural buildings and outline planning permission for residential development of up to 90 dwellings (Use Class C3) including means of access into the site (not internal roads) and associated highway works, with all other matters (relating to appearance, landscaping, scale and layout) reserved.

Decision

1. The appeal is dismissed and planning permission is refused.

Preliminary Matters

2. The proposal is in outline, with all matters reserved aside from the access to the site.
3. Prior to the start of the inquiry the appellant sought to submit a revised parameters plan (Drawing Number: Edp3344-d035d) and a revised Proposed Pedestrian Site Access and Tactile Paving Crossing Plan (Drawing Number: 18242-05D) (Revised Plans). The appellant discussed its intentions regarding the submission of these Revised Plans with the Council at the beginning of October 2019, advising them of their intention to consult those originally notified of the outline planning submission.¹ In response the Council advised "*I don't anticipate any objection from the Council in relation to the consultation or consultation dates.*"²
4. The appellant consulted on these Revised Plans on 8 October 2019, explaining the amendments and providing copies of the plans, giving 3 weeks for recipients to comment / make further representations. The consultation provided details of how to make comments and comments were received by

¹ E-mail dated 2 October 2019 at 4:12pm from Tom Armfield, Turley to Bedford Borough Council and the Planning Inspectorate.

² E-mail dated 3 October 2019 at 10:10am from Peter White (Team Leader Planning Appeals and Enforcement, Bedford Borough Council) to Tom Armfield, Turley.

the Planning Inspectorate regarding this matter prior to the start of the Inquiry.

5. The proposed revisions shown in Drawing Number: Edp3344-d035d, the parameters plan, details the boundaries within the development area where the indicated storey height rises from 2 storeys (Maximum 9.5 Metres) to 2½ storeys (Maximum 11.5 Metres) and clarifies the heights of the proposal so that they are consistent with the design and access statement originally submitted with the outline planning application. It also shows an internal site footpath along the eastern boundary.
6. The revisions shown in Drawing Number: 18242-05D, the Proposed Pedestrian Site Access and Tactile Paving Crossing Plan, details an increase in footpath width from 3 metres to 3.5 metres, as requested by the Highways Authority; and removes the staggered arrangement between the footpath and the crossing, as recommended by the Road Safety Audit.
7. The revision to the parameters plan brings it into conformity with the design and access statement originally submitted with the outline planning application. It also provides certainty with regard to the internal site footpath along the eastern boundary. The revisions to the Proposed Pedestrian Site Access and Tactile Paving Crossing Plan ensure that the details conform with recommendations made in the Road Safety Audit or requests made by the Highways Authority. In the light of the above and applying the Wheatcroft Principles³, the Revised Plans do not materially alter the nature of this outline application. Furthermore, as adequate consultation has taken place with suitable time provided for representations to be made, the interests of interested parties have not been prejudiced. As such I accepted the Revised Plans and have taken them into account.
8. A completed agreement under Section 106 of the Town and Country Planning Act (as amended) (S.106) was submitted at the inquiry, and a Community Infrastructure Levy (CIL) Compliance Statement, which was not disputed by the appellant, was submitted by the Council. The S.106 makes provision for: 30% affordable housing; open space that includes equipped and / or natural play area, informal and amenity greenspace and structural planting; and a public transport contribution. From the evidence before me I am satisfied that the above obligations are necessary to make the development acceptable, are directly related to the development and are fairly and reasonably related in scale and kind to the development. Therefore, they would accord with the three tests set out in paragraph 56 of the National Planning Policy Framework (the Framework) and Regulation 122 of the Community Infrastructure Regulations 2010 (as amended). I have had regard to the provisions of the S.106 in the consideration of this appeal.
9. The Council resolved on 19 August 2019 that, had an appeal not been lodged against their failure to give notice within the prescribed period, they would have refused outline planning permission. The Council set out 4 putative reasons, which are summarised below:

Putative reason 1 - Prematurity, due to the fact that the emerging local plan is at an advanced stage and to allow the proposal would, at this point in the consideration of the emerging local plan, undermine the plan-making process;

³ Wheatcroft v SSE & Harborough DC [1982] JPL 37.

Putative reason 2 - The adverse impacts of the proposed development would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole and would result in an unsustainable form of development;

Putative reason 3 - The proposal is in an open countryside location and would be out of character with the linear form of development along Odell Road and result in a development that is harmful to the rural character of the area contrary to national policy and the policies contained in the Development Plan (DP); and

Putative reason 4 - The proposal would result in the significant loss of best and most versatile agricultural land contrary to national policy and the policies contained in the DP.

10. Historic England (HE) provided their response to the proposal after the Council reached its resolution of 19 August 2019. HE objected to the application on heritage grounds, citing concerns regarding the proposal's likely impact on the setting of the adjacent Scheduled Monument Little Odell abandoned medieval village (UID 1457397), as well as disturbance to undesignated archaeological remains.
11. HE raised concerns regarding the submitted amended heritage statement and archaeological assessment, dated 4th July 2019, advising that it did not include an assessment of the impact of the development on the setting of the Scheduled Monument at Little Odell, which would allow the Council to assess the degree of harm that the proposals would cause to the significance of a designated heritage asset. As such HE considered that the proposal did not accord with the relevant policies in chapter 16 of the Framework and advised that Outline Planning Permission should be refused.
12. In response to the HE comments, the appellant submitted a document entitled 'Land to the West of Odell Road, Harrold Heritage and Archaeology Addendum'. Having read the report and consulted with colleagues HE responded by advising that they *"...are in agreement that the proposed development will not significantly impact on the setting or significance of the Scheduled Monument."* In the light of this they confirmed the *"HE has no objection to the application on heritage grounds."* I consider this matter further below.
13. During the Inquiry there were discussions regarding the weight to be given to the emerging Bedford Borough Local Plan 2030 (LP2030), and the prospect of its adoption prior to the appeal decision being determined. Following the close of the Inquiry, the Council have written⁴ advising that they have received the emerging Local Plan Inspectors' examination final report, providing a copy of that report, along with a copy of the Local Plan Inspector's cover letter and final Main Modifications list. The Council have also advised of their intention to report this matter to the Council's Executive on 8th January 2020 and then Full Council on 15th January 2020, which they consider is likely to be the date of adoption.

⁴ Documents B listed below.

14. The appellant was asked for comments in regard to the above mentioned documents and I have received their response⁵. I have taken the appellant's response into account in my determination of this appeal.
15. Paragraph 48 of the Framework advises of the weight to relevant policies in emerging plans according to: the stage of preparation of the emerging plan; the extent to which there are unresolved objections to relevant policies; and, in the case of Bedford Borough Council's emerging plan, the degree of consistency of the relevant policies in the emerging plan to the National Planning Policy Framework 2012 (Framework 2012).⁶
16. Bearing in mind, the overall conclusion and recommendations, at Paragraph 217, of the Local Plan Inspectors' examination final report and the Appendix to that document, being the Proposed Main Modifications, and the Council's indication that they intend to proceed to adopt the LP2030 on 15 January 2020, the LP2030 will satisfy the requirements of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended) and meets the criteria for soundness in the Framework. As such the emerging LP2030 is at an advanced stage and I shall give it significant weight.
17. As such putative reason 1, the issue of prematurity, is superseded and I shall proceed accordingly.

Main Issues

18. The main issues are:

- the effect on the character and appearance of the surrounding area;
- whether the site represents a suitable location for the proposed development; and
- whether the proposal would represent an acceptable loss of best and most versatile agricultural land (BMVL).

Reasons

Planning Policy Background

19. The DP for the area consists of the Bedford Borough Local Plan 2002 (BBLP), the Core Strategy and Rural Issues Plan 2008 (CSRIP) and the Allocations and Designations Local Plan 2013 (ADLP). In addition, as set out above, the Council is at an advanced stage in the process of adopting the LP2030 and I afford significant weight to the policies in the emerging LP2030 accordingly.
20. The Policies that are most important to the determination of this appeal are Policies BE30, BE32 and BE35 of the BBLP; Policies CP1; CP2; CP13; CP14; CP21 and CP24 of the CSRIP and Policies AD1, AD2 and AD28 of the ADLP. In regard to the emerging LP2030, the Policies that are most important to the determination of this appeal are Policies 2S, 3S and 6S.
21. Policy BE30 of the BBLP, albeit contained in a time expired local plan and dated in terms of its phrasing, seeks to promote good design and as such is broadly consistent with the Framework, as such I afford it moderate weight. For the

⁵ Document C listed below.

⁶ In accordance with Paragraph 214 of the National Planning Policy Framework.

- same reasons I afford moderate weight to Policy BE32 of the BBLP, as it seeks to ensure that new development on the edges of rural and urban areas, or of villages, is carefully designed to minimise the effects of development on the surrounding land. In terms of Policy BE35 this also relates to design, with criterion 1 seeking to ensure that development respects local distinctiveness, in terms of its scale, density, massing, height, landscape and layout. Again, I consider this element of Policy BNE35 to be broadly consistent with the Framework and afford it moderate weight.
22. In terms of the CSRIP, Policy CP1 is the Council's Spatial Strategy and refers to sustainable levels, locations and forms of development. It refers to the objectives and Policies of the CSRIP, as well as the objectives and Policies of the East of England Plan (EEP) and the Milton Keynes and South Midlands Sub-Regional Strategy (MKSMSRS). Whilst the EEP and the MKSMSRS have been revoked, the Council's approach in relation to the use of spatial strategies, as identified in the objectives and Policies of the CSRIP, are broadly consistent with the Framework. Additionally, with the imminent adoption of the LP2030, Policy CP1 of the CSRIP will be replaced by Policy 2S (Spatial Strategy) of LP2030, which subject to modifications has been found sound under the transitional arrangements⁷ through the Local Plan examination process. As such I afford Policy CP1 of the CSRIP moderate weight.
 23. The objectives of Policy CP2 (i) and (ii) of the CSRIP are broadly consistent with paragraph 170 of the Framework in regard to the BMVL in that they seek to ensure planning decisions contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services, including the economic and other benefits of the BMVL.
 24. The CSRIP identifies Key Service Centres in Bedford, which includes the village of Harrold. Policy CP14 of the CSRIP states that most new development will be located within or around the edge of such centres. However, Policy 3S of the emerging LP2030 defines Harrold as a Rural Service Centre (RSC). This policy (Policy 3S) requires 260 homes to be provided in the RSCs and sets out that, other than Roxton, all sites will be allocated in Neighbourhood Development Plans. In terms of Harrold, this policy also sets a requirement of some 25-50 homes in and around the defined Settlement Policy Area boundaries. However, the final Main Modifications list modifies this Policy and states "*In RSC allocations may exceed 50 dwellings where specific local justification is set out in Neighbourhood Plans demonstrating that it would be appropriate in terms of the scale, structure, form and character of the settlement and the capacity of local infrastructure.*"
 25. Policy 3S of the emerging LP2030 also sets out that the Council will support the relevant local council and other representatives from local communities to identify the most appropriate means of meeting their required allocation through their Neighbourhood Development Plans and rural exceptions schemes. The delivery of housing will be monitored annually and where a Neighbourhood Development Plan or Neighbourhood Development Order has not been submitted to the Council no later than 12 months after the date of adoption of the local plan, the Council reserves the right to identify opportunities to address any shortfall through the development plan process.

⁷ See Paragraph 214 of the Framework.

26. The appeal site lies adjacent to the edge of the Settlement Policy Area boundary. As a result, for planning policy purposes, it lies within the open countryside where new development is currently controlled by Policy CP13 of the CSRIP. Whilst Policy CP13 refers to PPS7:Planning and the Countryside, which has been withdrawn, it prefaces this reference by referring to 'national policy'. National policy is now contained within the Framework and Policy CP13 requires development to be consistent with national policy. I consider Policies CP 13 and CP14 to be broadly consistent with the Framework and afford them moderate weight.
27. Policies CP21 seeks to ensure new development is acceptable in design terms, whilst Policy CP24 relates to landscape protection and enhancement. I consider both policies to be consistent with the Framework as Policy CP21 seeks to promote good design, whilst Policy CP24 seeks to ensure development contributes to and enhances the natural and local environment by recognising the intrinsic character and beauty of the countryside, as required by the Framework. I afford these policies moderate weight.
28. Policy AD1 of the ADLP is the Council's Sustainable Development Policy and, whilst made under the Framework 2012, it is broadly consistent with the current Framework, as such I afford it moderate weight. Policy AD28 of this plan relates to the provision of open space and built facilities in association with new development and accords with the 'social objective' set out in paragraph 8 of the Framework and the need to plan positively for "*...social, recreational and cultural facilities and services the community needs...*" as set out in Paragraph 92 a) of the Framework. As such I afford moderate weight to this policy.
29. However, Policy AD2 (Sustainable Design and Construction) of the ADLP sets out a requirement for all new residential development of 10 dwellings and over or 0.3 Hectares (ha) of land or over to meet the full Code for Sustainable Homes (CSH) level 4 or equivalent, as well as achieving zero carbon emissions as regulated by the Building Regulations. With the exception of legacy cases, the CSH was withdrawn in March 2015.⁸ The Framework does not reference the CSH, but gives great weight in determining applications where "*outstanding or innovative designs which promote high levels of sustainability... so long as they [it] fit in with the overall form and layout of their surroundings.*"⁹
30. Furthermore, the transition period for an existing energy performance requirement in local plan policy continued beyond 1 October 2015. The Written Ministerial Statement (WMS) of 25 March 2015 allowed Local Planning Authorities to apply existing energy performance policies, which set requirements up to the equivalent of the energy requirements of CSH Code level 4 until the amendments to the Planning and Energy Act 2008 in the Deregulation Act were commenced. Bearing in mind Policy AD2 of the ADLP does not require compliance in excess of CSH level 4, the wording of the Framework, the fact that no decision has yet been taken on when to commence the above mentioned amendments to the Planning and Energy Act 2008 and that the WMS remains the most up-to-date statement of policy on the role of planning in delivering energy performance standards, I afford moderate weight to this policy.

⁸ Written Ministerial Statement (WMS) Planning Update March 2015.

⁹ The Framework – Paragraph 131.

31. Whilst a consultation has recently been launched by the Government on Future Home Standards, the consultation is at an early stage and does not, at this point in time, change the weight I afford to Policy AD2 of the ADLP, as set out above.
32. Turning to the emerging Policies of the LP2030, Policies 2S and 3S have already been referenced above. In terms of Policy 6S (Development in the Countryside), this sets out the criteria for assessing development that lies outside defined Settlement Policy Areas and the built form of Small Settlements, indicating that such developments will be permitted, if it is appropriate in the countryside, in accordance with those criterion. Subject to modifications Policies 2S, 3S and 6S of the emerging LP2030 have been found sound by the Local Plan Examining Inspectors and bearing in mind the advanced stage the emerging LP2030 has reached, I afford significant weight to these policies.

The effect on the character and appearance of the surrounding area

33. The site consists of some 4.87 ha of agricultural land, which is currently laid to grass.¹⁰ It is bounded on the east by the Odell Road, whilst to the north and south are residential properties, including their curtilages, and agricultural land.¹¹ Harrold Lake lies west of the appeal site's boundary.¹²
34. Vehicular access to the appeal proposal would be gained from Odell Road, as shown on the submitted 'Parameters Plan', and is located between trees which are covered by a Tree Preservation Order.
35. The DP shows the Settlement Policy Area Boundary (SPAB) for Harrold being drawn along the western side of Odell Road, up to No.91 and then tightly drawn around that curtilage and the curtilages of the properties immediately to the south, with the exception of No.81A Odell Road where the dwellinghouse lies within the SPAB but the majority of the rear garden is excluded from it. To the south of No.81A, the SPAB is drawn tight to the rear elevations of the terraced properties (No.69 to No.81 Odell Road) and the detached property No.67 Odell Road. The rear gardens of these properties (No.67 to No81 (odds)) are also excluded from the SPAB.
36. The prevailing pattern of the above mentioned properties is one of a linear form of development, albeit some dwellings lie to the rear of these frontage properties.
37. The appeal site, and residential properties immediately to the north and west of it lie outside the SPAB and are within the open countryside for the purposes of the DP. These existing dwellinghouses to the north are also linear in their nature and the predominant character of the area is rural in its nature.
38. An 'Illustrative Master Plan' has been provided as part of the submission, albeit I appreciate that the appellant is not tied to it and details of layout would be subject to a reserved matters submission. Nonetheless, the purpose of illustrative plans are to demonstrate that an acceptable development, up to the number of residential units proposed, could be achieved at the reserved matters stage. The 'Illustrative Master Plan' indicates that the residential

¹⁰ Statement of Common Ground - Paragraph 2.1.

¹¹ Ibid – Paragraph 2.2.

¹² Ibid.

development area would be set back from the road by a minimum of approximately 12 metres and extend back into the development site by some 220 metres.

39. There is no evidence before me in regard to the status of the land to the rear of Greenfields (No.117 Odell Road), the land to the north of the appeal site, or the land rear of the curtilages of Nos.67 to No.81A Odell Road, the land to the south of the appeal site. For the most part, these parcels of land have the appearance of pasture / agricultural land outside of a residential curtilage.
40. The appeal site rises from the south-western corner of the site to the north-eastern corner, with the lower parts of the appeal site falling within landscape character area 3A Harrold – Great Ouse Limestone Valleys (Landscape Character Area 3A), as defined by the Bedford Borough Landscape Character Assessment (LCA). The LCA describes the settlements within Landscape Character Area 3A as *"located at the edges of the valleys above the floodplain"*. It states, *"the sloping valley sides of the Odell and Pavenham wooded wolds provide a sense of enclosure and a wooded backdrop to the area"*. However, the majority of the built form of the development lies within the remainder of the appeal site, which lies within landscape character area 2A (Hinwick Wooded Wolds) (Landscape Character Area 2A), where the LCA describes *"Settlement as sparse..."*¹³, with the physical and natural character having a *"...distinctive sloping and gently undulating landscape..."* where the *"...undulating land is predominantly cultivated for arable use; the fields being enclosed by a well maintained network of hedgerows and hedgerow trees..."*¹⁴
41. The landscape strategy for Landscape Character Area 2A is *"... to conserve the rural landscape of rolling arable farmland with its largely intact hedgerow network, its scattered small scale limestone settlements and farmsteads... while enhancing elements of landscape which are in declining conditions."*¹⁵
42. Within the context of the local landscape the site reads as a single and extensive field of an agricultural nature and I found its appearance made a positive contribution to the local landscape, especially when viewed from Odell Road and public footpath HRR4B. Whilst the appeal site has not been actively farmed for some time it still retains the appearance of typical farmland which is visible in the wider surrounding area.
43. The appeal site's appearance, as current, does not detract from its surroundings. However, albeit the master plan is illustrative and layout is a reserved matter, it is clear that a development of up to 90 dwellinghouses would result in the introduction of a development that, whilst on the edge of the SPAB, would introduce built form that significantly projects back into the site beyond that of adjoining properties. This would result in a development that would have no visual or physical affinity to the existing built form within the SPAB or the dwellinghouses located in the open countryside north or east of the appeal site. Regardless of the final layout, a development consisting of up to the number of dwellinghouses proposed would have to result in a built form that significantly projects back into the site and such built form would represent a form of development at odds with the prevailing pattern of the

¹³ CD8.17 – Paragraph 2A.16.

¹⁴ Ibid – Paragraph 2A.2.

¹⁵ Ibid – Page 54 Landscape Strategy.

adjacent dwellinghouses, both within the SPAB and in the countryside to the north and east of the site.

44. Whilst I appreciate that landscaping, which is also a reserved matter, could provide some screening for the development, especially from Odell Road, I consider that such landscaping would take time to become established and even once established would be unlikely to mitigate the harm described above. Furthermore, I consider it likely that the roofs of the homes within the development would be apparent in the wider landscape. This was especially apparent from the accompanied site visit, in particular when viewed from public footpaths HRR4B, ODE22B and ODE22C. While a significant part of the site would be free from built development, the areas of open space and landscaping would clearly be elements of what is in effect a housing estate layout that bears no visual or physical affinity with its surroundings. As such I consider that the proposal would as a whole be out of character with the surrounding area.
45. In addition to that above, I note that a significant portion of the mature hedgerow marking the site's boundary with Odell Road would need to be removed to facilitate the formation of the access points for the development and the creation of a separate pedestrian access to the southern side of the Odell Road frontage. That hedge forms part of the hedgerow that is present along Odell Road, which I consider makes a significant contribution to the appreciation of the area's rural character, particularly when entering or exiting the more built up area at the junction of Odell Road and High Street (Odell).
46. While quite mature replacement hedging could be planted to accommodate the provision of the new vehicular access, with its sightlines and a separate pedestrian access, I nonetheless consider that it would result in this part of Odell Road having a significantly more urban appearance than is currently the case. In this regard, I consider that the replacement hedge would be likely to take on a manicured appearance, especially in regard to ensuring the necessary vision splays for vehicles emerging onto Odell Road, and this would further harm the significant contribution the existing hedge makes to the appreciation of the area's rural character.
47. While the development's visual impact would be of a localised nature, i.e. affecting the area immediately around Odell Road and the immediately surrounding public footpath network, including ODE22B, ODE22C, and HRR4B, and thus being of most significance for occupiers of the properties immediately adjoining the site, pedestrians and drivers using Odell Road and users of the Local Public Footpath network, I nevertheless consider that the development would not accord with the guidelines for new development as set out in the LCA. That is because there would be a significant urbanisation in the area's rural character, with the replacement and/or additional planting providing inadequate mitigation and significant alterations being made to the roadside hedgerow. I therefore consider that the landscape impact would be locally significant and harmful.
48. On this issue, I therefore conclude that the proposed development would introduce built form that would have no visual or physical affinity to the existing built form within the SPAB or the dwellinghouses located in the open countryside north or east of the appeal site. As such the proposal represents a form of development at odds with the prevailing pattern of the area and would

unacceptably affect its character and appearance. I therefore consider that the developments would be contrary to Policies BE30; BE32 and BE35 of the BBLP; Policies CP2, CP13, CP21 and CP24 of the CSRIP; Policy AD1 of the ADLP; and Policies 2S and 6S of the emerging LP2030. This is due to the fact that the development would be at odds with and fail to safeguard the intrinsic character of the countryside and would not conserve and enhance the character and distinctiveness of the local landscape.

49. I also consider that the development would not accord with paragraph 170b) of the Framework because it would fail to recognise the intrinsic character and beauty of the countryside at this point. In that regard caselaw¹⁶ has established that development proposals affecting parts of the countryside that are not subject to a statutory landscape designation, such as the appeal site, nevertheless come within the scope of the provisions of what is now paragraph 170b) of the Framework.

Whether the site represents a suitable location for the proposed development

50. Given the proximity of the site to the settlement boundary of Harrold and the linear development along the Odell Road in the vicinity of the site, I do not consider that the site would be physically isolated, and it would technically be within walking distance of the services and facilities of the Village. The speed limit on the road fronting the appeal site is 30MPH and the main pedestrian access to the village would be along a narrow poorly lit footpath that runs along the opposite side of the road to the appeal site for a short distance before crossing the 'T' Junction of Odell Road and High Street (Little Odell) and then continuing down Odell Road, before crossing to the other side of the road near the Community Fire Station. It was clear during the accompanied site visit that the part of the footpath running between the 'T' Junction and the Fire Station was particularly narrow at points and not wide enough for people to pass one another when, for example, walking in opposite directions where one or both parties have a child in a push chair.
51. A second access to the village would exist with the provision of a pedestrian link to public footpath No.HRR4B, which is located to the west of the appeal site. However, the public footpath is narrow in places, unlit and not surfaced. Indeed, during my accompanied site visit parts of this footpath were extremely muddy underfoot.
52. The site is accessible to public transport, with the closest bus stop being some 200 metres to the south of the proposed sites vehicular access onto Odell Road. The No.25 bus route is the main service in Harrold linking it to Harrold High Street, the village of Rushden and to the bus station in Bedford. However, whilst operating at reasonably regular intervals during the day (generally hourly), not all services go to this bus stop (Harrold (Odell Road)) and there is only one service out of Harrold on weekdays in the very early morning at 6:40AM, with a 2 hour gap before the next No.25 service. The first No.25 service out of Harrold on a Saturday is 8:40AM and arrives at Bedford Bus Station at 9:15AM. In terms of the last No.25 bus service from Bedford to Harrold, this leaves Bedford Bus Station at 6:20PM Monday to Saturday. From the evidence provided there is no No.25 bus service on a Sunday. Therefore, its timetable restricts the utility for commuters or those wishing to travel in the evenings for leisure purposes.

¹⁶ Cawrey Limited and the Secretary of State for Communities and Local Government [2016] EWHC 1198 (Admin).

53. Public footpath No.HRR4B is unlikely to be conducive to people using it in the early morning or evenings, especially when the light is poor or in inclement weather. Also, bearing in mind the limited public transport provision, especially in the early mornings and evenings, the speed limit, and that the pedestrian footpath on Odell Road is narrow in places, poorly lit and crosses at a number of points with no traffic islands or pedestrian safety crossing points, it is unlikely that pedestrians would see this as an attractive route, particularly in the dark or when the weather is poor. In my view, future residents are likely to use private vehicles to access the closest services and facilities in Harrold and further afield.
54. I am mindful that the Framework advises that all aspects of sustainability should be considered in planning decisions, that local circumstances should be taken into account, and that opportunities to maximise sustainable transport solutions will vary from urban to rural areas. However, the proposal would not promote a choice in alternative forms of transport and the occupiers of the dwellings would be heavily reliant on private motor vehicles as opposed to more sustainable modes of transport to reach day to day facilities and services. Consequently, the proposal would not accord with the accessibility objectives of local and national planning policy.
55. For these reasons, I conclude that the appeal site would not be located in an accessible location and there would be significant reliance by the occupiers of the dwellings on private motor vehicle journeys. The proposal would therefore not accord with Policy CP2 of the CSRIP, Policy AD1 of the ADLP or Policy 6S of the emerging LP2030, which among other objectives seek to ensure sustainable development patterns and that development does not give rise to significant adverse impacts on the environment. Furthermore, the development would not actively manage patterns of growth in support of the objective of promoting sustainable transport as required by the Framework.

Whether the proposal would represent an acceptable loss of BMVL

56. It is common ground between the appellant and the Council that the whole of the site is classified as subgrade 3a and thus comprises BMVL.¹⁷ As such the development would involve the loss of 4.87 ha of grade 3a BMVL.
57. The Council's fourth putative reason for refusal relates to the loss of BMVL and specifically refers to Policy CP2 (i) and (ii) of the CSRIP. Policies CP2 sets out the Council's principles of sustainable development within the borough and criterion (i) and (ii) of this policy specify that development and use of land will ensure that resources and infrastructure are used efficiently with the priority on the re-use of brownfield land. It also seeks to ensure biodiversity is protected and scarce resources are conserved. As set out above I consider the objectives of Policy CP2 (i) and (ii) of the CSRIP are broadly consistent with paragraph 170 of the Framework.
58. However, the evidence indicates that some 60% of the Council's area is thought to be classed as being BMVL and as such it seems likely that a significant amount of the new housing to be provided in the future will involve the loss of some BMVL. As such the loss of 4.87 ha of Grade 3a BMVL itself would not be significant, albeit I appreciate that multiple losses of similar proportions would be more significant.

¹⁷ Statement of Common Ground – Paragraph 5.15.

59. On the evidence before me, I consider that the loss of BMVL at this site would not be significant or unacceptable, especially bearing in mind the modest scale of the loss at some 4.87ha and the fact that the land in question is at the lower end of the quality range for BMVL. Whilst the loss of BMVL would be contrary to the objectives of Policies CP2(i) and (ii) of the CSRIP, I consider that the scale of loss would be insufficient to adversely affect the development and diversification of agricultural and other land based rural businesses. Accordingly, in this regard I consider that there would be no significant conflict with the Framework's policies for supporting a prosperous rural economy, most particularly paragraph 170b). I therefore consider very modest weight should be attached to the loss of BMVL in this instance.

Other considerations

Housing Land Supply

60. It is common ground that the Council is not currently able to demonstrate a Five Year Housing Land Supply (5YHLS). However, the parties disagree as to the extent of the shortfall, with the Council indicating that it has 3.07 years of Housing Land Supply (HLS), whilst the appellant argues the Council can only demonstrate 2.74 years HLS.¹⁸ The difference between the parties figures is small at 0.33 of a year. Regardless of whether you take the Council's position on 5YHLS or the position of the appellant, the deficiency represents a significant shortfall in the 5YHLS figure. It is not therefore necessary for me to comment further on the merits of the respective assessments because the outcome would be the same whichever figure is adopted.
61. In terms of how long this deficit is likely to persist, the Council are at an advanced stage in the adoption of its emerging LP2030, with the Council having received the emerging Local Plan Inspectors' examination final report. Subject to the incorporation of the main modifications recommended by the Local Plan Inspectors they consider the plan to be sound and capable of adoption. The Council have also advised of their intention to adopt the LP2030, incorporating the Local Plan Inspectors recommended main modifications, at their Full Council on 15th January 2020 and as such it is highly likely that the emerging LP2030 will be adopted on this date.
62. Paragraph 74 of the Framework states "A five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan..." This is a significant consideration in the balancing of this matter. Whilst the current 5YHLS has a deficit of some 2 years, the fact that the emerging LP2030 has been found sound, albeit with modifications, it is reasonable to infer that the emerging LP2030 is consistent with the Framework 2012 and a deliverable supply of housing can be provided accordingly. Indeed Footnote 38 of the Framework advises "*For the purposes of paragraphs 73b and 74... a plan adopted between 1 November and 30 April will be considered recently adopted until 31 October in the same year.*"
63. Bearing these factors in mind, whilst the Council accepts that it cannot currently demonstrate a 5YHLS and that the Policies in its DP are currently out-of-date, this position will change imminently upon adoption of the emerging LP2030. As such I attach only moderate weight to the present shortfall in HLS.

¹⁸ Statement of Common Ground on 5 Year Housing Land Supply – Table 2 Respective five year land supply position of each party.

Affordable housing

64. The appellant and the Council agree that a minimum provision of 30% affordable housing would be required by the Council's Policies and that a legal agreement could ensure that this provision would be achieved by this application.¹⁹ Indeed such a legal agreement has been submitted.²⁰ The Council advised that such a provision of affordable housing would be compliant with Policy CP8 of the CSRIP and policies 34, 59S and 90S of their emerging LP2030, as well as Part 2(A) of their Supplementary Planning Document Planning Obligations.²¹ Furthermore, the Council in Mr White's proof of evidence "...attributed significant weight to the delivery of affordable housing."²² Bearing this in mind, as well as the fact that the proposal would be in compliance with the Council's Policies in regard to the delivery of affordable housing, I consider that the provision of affordable housing would be a clear benefit, and as such significant weight should be attached to this factor in the overall planning balance.

Heritage

65. The Framework advises "Heritage assets range from sites and buildings of local historic value to those of the highest significance..."²³ This includes scheduled monuments²⁴, which are monuments listed in the Schedule of Monuments under section 1 of the Ancient Monuments and Archaeological Areas Act 1979 (the 1979 Act). They are of national importance by definition. All designated and non-designated heritage assets are considered to be an irreplaceable resource and should be conserved in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of existing and future generations.²⁵
66. The statutory duties in regard to the effects of development on listed buildings, their setting and on conservation areas are set out in Section 66(1) and 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 (as amended). Additionally, Paragraph 193 of The Framework states: "*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be)...*"
67. HE's advice, and position based on additionally submitted information by the appellant, is set out in the Preliminary Matters section above. Having considered the additional document submitted by the appellant²⁶, HE removed their object to the proposal on heritage grounds.
68. I note that the Council did not include a heritage ground within their putative reasons for refusal and I also note that the appellant and the Council agree that "*Subject to conditions, there are no objections related to concerns to*

¹⁹ Statement of Common Ground – Paragraph 5.5.

²⁰ Document 26.

²¹ Council Document entitled "S106 Obligation Assessment of Compliance with CIL Regulation 122 and NPPF Para 56."

²² Mr White Proof of Evidence – Paragraph 8.18.

²³ The Framework – Paragraph 184.

²⁴ See definition of 'Designated heritage asset' in the Glossary (Annex 2) of the Framework.

²⁵ The Framework – Paragraph 184.

²⁶ Document entitled 'Land to the West of Odell Road, Harrold Heritage and Archaeology Addendum'.

below or above ground heritage assets."²⁷ From the evidence before me, and bearing in mind that HE have removed their objection, I have no reason to disagree with this position. Indeed, in terms of the impact of the development on archaeology, the Scheduled Monument and its setting, as well as the setting of nearby listed buildings²⁸, with the closest listed building being located some 200 metres to the east and slightly south of the appeal site (No.215 High Street, Odell), I was able to see on my site visit, that the settings of the ancient monument and the listed properties were relatively localised.

69. In terms of the scheduled monument, it is set a reasonable distance away from the site and is well screened from public vantage points by the stone wall on the north and boundary treatment on its western side. In terms of the listed buildings, I noted during my site visit that the appeal site had no clear visual relationship between the proposed development and the listed buildings. Indeed, the listed buildings were not readily visible from any point along the appeal sites frontage with Odell Road, including the closest point of the appeal site on the Odell Road to these listed properties when viewed in a direct line.
70. Taking into account the limited visibility of the scheduled monument and listed buildings, and the intervening distances between these heritage assets and the appeal site, I consider that the proposed development would have a neutral impact on archaeology, as well as on the Scheduled Monument, its setting and the setting of nearby listed buildings, thus preserving them and any archaeology.
71. For the above reasons, subject to the imposition of appropriate conditions, I conclude that the proposal would not harm archaeology, the scheduled monument, its setting or the setting of the nearby listed buildings. The proposal would preserve these designated heritage assets and their setting and would accord with the requirements of Chapter 16 of the Framework.

Other matters

72. The appellant points to the improvements that would result from the development, including the provision of public open space and play equipment, highway improvements and enhanced bus stop facilities. Whilst these are noted, it has not been suggested that the improvements would be more than the minimum required to mitigate the impact of the development. I acknowledge that, by their nature, mitigation works would be of some benefit but they merit no more than limited weight, as opposed to being neutral in the planning balance.
73. Turning to ecology and biodiversity, I have noted the Ecological Appraisal submitted with the proposal and the letter of the Environmental Dimension Partnership (EDP), dated 10 October 2019.²⁹ However, the ecological mitigations set out in those documents are minimal, as are the restoration, enhancement and maintenance measures identified. Whilst the restoration, enhancement and maintenance measures could be seen as a benefit, potentially increasing biodiversity in the area, it is clear to me that what is proposed here would amount to the minimum necessary.

²⁷ Statement of Common Ground – Paragraph 5.14.

²⁸ The Scheduled Monument and Listed Buildings have group value. The listed buildings included the at 207, 208, 212 and 215 High Street, as well as The Mad Dog Inn and they date to the late C17 and early C18.

²⁹ Tom Armfield's Proof of Evidence – Appendix 8.

74. Development should contribute to, and enhance, the natural environment in order to accord with the Framework (paragraph 170) and the proposal would have the potential to bring a biodiversity gain. However, from the evidence I have before me, there is nothing to suggest that biodiversity gain would occur to any significant degree. Indeed, I consider the ecological mitigation proposed, along with the ecological enhancements and biodiversity gain to be nominal and as such I give this matter limited weight.
75. The economic benefits during construction of the development would weight in favour of the scheme, albeit such benefits would be temporary. Additionally, the social and economic contribution the occupiers of the site would make to the community and the local economy are also acknowledged and add weight in favour of the proposal. The appellant's reference to payment of the New Homes Bonus is also noted, but no evidence has been drawn to my attention of a connection between such payments and the development to enable it to be taken into account in accordance with the advice in the Planning Practice Guidance.³⁰ In the context of the identified economic benefits, I give these matters modest weight.
76. During the Inquiry, my attention was drawn to a number of appeal decisions, with copies of those appeal decisions being provided.³¹ Additionally, my attention was drawn to a planning committee report related to planning application 19/00894/MAO (Land adjacent to Wootton Upper School and Arts College, Hall End Road, Wootton, Bedfordshire).³² This planning application was due to be considered by the Members of the Council's planning committee on 25 November 2019. However, other than the appeal decision letters and the copy of the Council's planning committee report, I have not been provided with specific details of those submissions and am not aware of the planning background to those cases. Irrespective of this, each case must be considered on its own merits.

Overall Planning Balance

77. The Council are currently unable to demonstrate a five year supply of housing land, as required by paragraph 73 of the Framework. Accordingly, the provisions of paragraph 11. d) ii. of the Framework apply. Policies BE30, BE32 and BE35 of the BBLP; Policies CP1; CP2; CP13; CP14; CP21 and CP24 of the CSRIP; and Policies AD1, AD2 and AD28 of the ADLP are most important to the determination of this appeal and, for the reasons set out above, I consider them to be broadly consistent with the Framework.
78. Furthermore, Policies 2S, 3S and 6S of the emerging LP2030 have, subject to the recommended main modifications, been found to be sound by the Local Plan Inspectors. The Council has indicated that they intend to proceed to adopt the LP2030 on 15 January 2020. As such the emerging LP2030 is at an advanced stage and I afford these policies significant weight.
79. The provision of affordable housing within the development would be an unquestionable benefit for the reasons identified above and I attach significant weight to this matter. However, in terms of the 5YHLS and housing delivery generally, due to the Council's advanced stage in the adoption of its emerging

³⁰ National Planning Practice Guidance - Paragraph: 011 Reference ID: 21b-011-20140612.

³¹ See List of Documents submitted at the Inquiry, as set out below

³² Ibid.

LP2030 the Council will be able to demonstrate a five year supply of deliverable housing sites. This is a significant consideration in the balancing of this matter and whilst the current 5YHLS has a deficit of some 2 years, the fact that the emerging LP2030 has been found sound, albeit with modifications, it is reasonable to infer that the emerging LP2030 is consistent with the Framework 2012 and a deliverable supply of housing can be provided accordingly. As such I afford the matter of 5YHLS and housing delivery generally moderate weight.

80. I acknowledge that the proposed development would preserve the scheduled monument and its setting, as well as the setting of the nearby Grade II Listed Buildings located on High Street, Odell. Additionally, I have found the loss of BMVL to only carry very modest weight in terms of the functioning of the rural economy.
81. Irrespective of the above, none of these factors diminish my concerns about the adverse effects of the development, particularly with regard to the effect of the development on the character and appearance of the area and its failure to conserve and enhance the character and distinctiveness of the local landscape in an area that is typically characterised by open fields and farmland. As such the proposal would be contrary to Policies BE30; BE32 and BE35 of the BBLP; Policies CP2, CP13, CP21 and CP24 of the CSRIP; Policy AD1 of the ADLP; and Policies 2S and 6S of the emerging LP2030.
82. Furthermore, I consider the appeal site is not located in an accessible location and there would be significant reliance by the occupiers of the dwellings on private motor vehicle journeys. As such, the proposal would not be sustainable development and would not accord with the Framework or Policy CP2 of the CSRIP, Policy AD1 of the ADLP or Policy 6S of the emerging LP2030, which among other objectives seeks to ensure sustainable development patterns.

Conclusion.

83. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. Overall I have found the development would not accord with the Council's current adopted or emerging spatial strategy. It would fail to conserve and enhance the character and distinctiveness of the local landscape and would adversely impact on the character and appearance of the area generally. Furthermore, the development would not amount to a sustainable form of development, including that related to rural housing and sustainable transport.
84. As such the development would conflict with Policies BE30, BE32 and BE35 of the BBLP; Policies CP1; CP2; CP13; CP14; CP21; and CP24 of the CSRIP; Policies AD1, AD2 and AD28 of the ADLP. I conclude that the proposal would not accord with the development plan when considered as a whole. It is therefore necessary to consider whether there are other considerations which indicate that permission should nevertheless be granted.
85. The first such consideration is the emerging LP2030. I have identified that the proposals would conflict with Policies 2S, 3S and 6S and I consider that these conflicts are of sufficient importance that the proposals would not accord with the emerging LP2030 when considered as a whole. Given the advanced stage the plan has reached, I attach significant weight to that conflict.

86. I now turn to the balance required by Paragraph 11. d) ii of the Framework. For the reasons given above, I attach significant weight to the delivery of affordable housing and moderate weight to the delivery of market housing. I attach modest weight to economic benefits and limited weight to open space, transport and biodiversity improvements.
87. On the other hand, I have identified conflict with the policies of the Framework which relate to conserving the natural environment (with particular regard to the intrinsic character and beauty of the countryside) and promoting sustainable transport. I attach significant weight to these factors. I also attach very modest weight to the loss of BMVL.
88. Overall, I conclude that the harm caused in this case would significantly and demonstrably outweigh the benefits identified when assessed against the policies in the Framework taken as a whole. As such the proposed development does not benefit from the Framework's presumption in favour of sustainable development.
89. Bearing all of the above in mind, there are no material considerations that would indicate that the decision in this case should be taken otherwise than in accordance with the Development Plan. Accordingly, and having regard to all other matters raised, I conclude that the appeal should be dismissed and Planning Permission Refused.

Christopher Butler
INSPECTOR

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:	
Mr Johnathan Clay of Counsel	Instructed by David Doorne, Borough Solicitor, Bedford Borough Council
He called	
Mr Peter White – (BA Town Planning), MA (Linguistics), PG Dip (Town Planning), MRTPI, Member of the National Association of Planning Enforcement; Member of the Planning Officers Society.	Team Leader Planning Appeals and Enforcement Bedford Borough Council
Carolyn Barnes BA (Geography), MPhil in Town and Country Planning, MRTPI	Senior Planner Planning Policy Team Bedford Borough Council
Mr M W Palmer (MSc, PhD MISoilSci, CSci)	Director and Senior Consultant, Land Research Associates Ltd.
Scott Lawrence BEng (Hons) Materials Science - Affordable Housing;	Senior Researcher, Opinion Research Services.

FOR THE APPELLANT:	
Mr Zak Simons of Counsel	Instructed by Mr Tom Armfield of Turley
He called	
Mr Jeff Richards	Director and Head of Planning South West, Turley.
Mr Tom Armfield BA (Hons) Town Planning, MA Urban Design, MRTPI.	Director, Turley.
Mr James Stacey BA(Hons), Dip TP, MRTPI.	Director, Tetlow King Planning
Mr Charles Mylchresst BA (Hons) Landscape Architecture (LA), PG Dip LA, Chartered Member of the Landscape Institute, Associate Member of the Institute of Environmental Management and Assessment.	Director EDP
Ms Clare Grierson BA (Hons) (Architecture and Planning), MA (Urban Design), MRTPI.	Associate Director, EDP
Mr Tom Kernon BSc (Hons), RICS, Fellow of the British Institute of Agricultural Consultants.	Kernon Countryside Consultants Ltd
Mr Ed Barrett, MRTPI.	Senior Planning Manager Catesby Estates PLC.

INTERESTED PARTIES

Mr Sebastian Reger;	Harrold Parish Council – Parish Council
Rt Honourable Alister Bert;	Former Member of Parliament for North-East Bedfordshire Speaking on behalf of constituents
Mr Tony Roche	Odell Parish Council
Councillor Doug Mc Murdo	Speaking on behalf of the constituents of Sharnbrook
Councillor Alison Foster	Speaking on behalf of the constituents of Harrold
Paul Jenkins	CPRE (Bedfordshire)
Shuna P Mitchell	Local Resident
Mr Mathew Sumpton	Representing neighbours at Little Odell
Mr Barry Halton	On behalf of Local Residents
Mr Brian Watson	Resident
Mr Gerry Sansom	CPRE (Bedfordshire)

DOCUMENTS SUBMITTED AT THE INQUIRY

1	Appellant's list of Appearances.
2	Council's list of Appearances.
3	Appellants Opening Statement.
4	Council's Opening Statement.
5	Statement of the Rt Honourable Alister Bert (Former Member of Parliament for North-East Bedfordshire.
6	Statement of Mr Tony Roche, Chairman of Odell Parish Council.
7	Statement of Councillor Alison Foster
8	Statement submission of Mr Paul Jenkins on behalf of CPRE Bedfordshire.
9	Statement submission of Mr Mathew Sumpton.
10	Statement submission of Mr Barry Halton
11	On behalf of the appellant - Second Rebuttal Proof Evidence of Jeff Richards BA (HONS), MTP, MRTPI, which included Five Year Housing Land Supply – Commentary on disputed Sites and e-mail exchange between James Williamson at Milton Keynes Council and the Planning Inspectorate concerning Annual Position Statements (e-mails dated: 28 March 2019 at 09:20; 01 April 2019 at 15:42; 03 April 2019 at 08:50; and 03 April 2019 at 09:31).
12	On behalf of the appellant - Tetlow King Planning - Additional Affordable Housing Evidence Errata Sheet, including copies of Appeal Decisions 2228089 - Land at Fairfields Farm, Hollybush Lane, Burghfield Common, Reading, Berkshire; 2226342 - Agricultural Land to both north and south of Mans Hill Burghfield Common, Reading, Berkshire; 3136233 - (Site A) Land west of Langton Road, Norton; and 3136237 - (Site B) Land west of Langton Road, Norton;
13	On behalf of the Council – High Court – Gladman v SSHCLG/Sedgemoor District Council [2019] EWHC 128 (Admin);
14	Submitted by Appellant – Extracts of Secretary of State Decision Letter 3180729 – Pages 1, 2 and 6 and extracts from Planning Inspectors Report for 3180729 - Pages 82 and 83;
15	Submitted by Council – e-mail from Daniel Hatcher (Rosconn Group) dated 12 November 2019 at 17:06 – subject: Graze Hill, Bedford

16	Submitted by Appellant – [2015] EWCA Civ 10 R (Timmins) and another v Gelding Borough Council CA 837.
17	Submitted by Council - Document entitled Bedford Local Plan 2030 (Examination) Affordable Housing Forecast Update (Examination Document ED30).
18	Submitted by Council – Table marked top right hand box 'Monitoring Report' (Table update re Affordable Housing).
19	Submitted by Council – representation made by Tetlow King Planning, dated 2 March 2018, made on behalf of Rentplus UK Ltd, with reference MR M15/0715-184 with title Re: Bedford Borough Local Plan 2035: Plan for submission consultation. Submission included response to Question 6a of the Council's Representation Response Sheet and a document entitled "Rentplus: An Affordable Housing Model – Affordable Housing Statement".
20	Submitted by Appellant – Appeal Decision 3207411 – Land to the South of Williamsfield Road, Hutton Cranswick YO25 9BH.
21	Document marked 'Request from local residents closest to the proposed development for Conditions to be imposed by the Inspector on the development in the event of the appeal by Catesby Promotions being upheld'.
22	Written comments of Local Residents submitted 21/11/2019, as amended 22/11/2019, marked 'Closing Statement from Local Residents' and attached Housing Needs Survey Report – Harrold – October / November 2016.
23	Submitted by Appellant – Baroness Cumberlege of Newick and another v SoS CLG and Local Government and Another [2018] EWCA Civ 1305.
24	Submitted by Appellant – North Wiltshire District Council v SoS for the Environment and Others [1992] 3 PLR 113.
25	Submitted by Appellant – Copy of the Bedford Borough Council's Committee Report for Monday 25 November 2019 relevant to planning application 19/00894/MAO – Land adjacent to Wootton Upper School and Arts College, Hall End Road, Wootton, Bedfordshire
26	Finalised S.106 Agreement (signed and dated 22 November 2019).
27	Closing Submissions on Behalf of Bedford Borough Council.
28	Appellant's Closing Submissions.

DOCUMENTS SUBMITTED AFTER THE INQUIRY

A	Revised draft conditions 12 and 28.
B	e-mail, dated 23 December 2019 (16:19 hours) with attachments from the Council (Peter White). The attachments consist of the covering letter from the Planning Inspectorate, the Examining Inspectors' final report and the final Main Modifications list.
C	Letter from Turley dated 2 January 2020, on behalf of Catesby Estates (Developments) Ltd in response to correspondence, together with attachments, received from the Council (Peter White) on 23 December 2019, in regard the receipt of the Inspectors Report for the Emerging Local Plan 2030.