



Bedford Borough Local Plan 2040

Response by AWG to Strategy Options and Draft Policies Consultation

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1.0 Introduction

- 1.1 These representations have been prepared on behalf of Arnold White Group ('AWG') in response to the public consultation on Bedford Borough Council's ('BBC') Local Plan 2040 – Draft Plan, Strategy Options and Draft Policies Consultation ('the Local Plan').
- 1.2 AWG are a landowner and strategic land promoter, owning and controlling significant areas of land within Bedford Borough. These representations are made having particular regard to a 96ha area of land at Broadmead, Marston Vale, north of Stewartby. This land forms part of the wider 222ha 'Bedford Business Park' being promoted by Cloud Wing UK Ltd ('Cloud Wing').
- 1.3 A Site Location Plan identifying the extent of land (hereafter referred to as 'the Site') is enclosed at Appendix 1.
- 1.4 The Site has previously been submitted to BBC as part of the Call for Sites process, and AWG has been active participants in every stage of the Local Plan 2030, as well as the 2020 consultation on the Local Plan 2040.
- 1.5 The response to this consultation considers the key issues of job growth; strategic locations for growth; climate change; and, as an overall point, the relationship of the Local Plan to the Arc Spatial Framework and Government's proposed planning reforms.
- 1.6 This response also includes further information in relation to the land at Bedford Business Park, with the enclosed illustrative Masterplan (Appendix 2) demonstrating how the land would deliver substantial employment and economic opportunities in accordance with national policy.

2.0 Approach to Growth

Employment Needs

- 2.1 Paragraph 16 states that Local Plans should be prepared with the objective of contributing to sustainable development and be prepared positively in a manner that is aspirational as well as deliverable.
- 2.2 The NPPF also requires (para 23) that the Strategic Policies of the Plan should provide a clear strategy for bringing land forward to meet objectively assessed needs in line with the presumption in favour of sustainable development (para 11), and, in doing so, allocating sufficient sites to deliver the strategic priorities of the area.
- 2.3 National Policy therefore provides a clear, positive context with a clear requirement to meet identified needs in an aspirational but deliverable fashion. Importantly, the NPPF does not state that Plans should adopt a ‘do minimum’ approach; instead it promotes ambitious growth, where it is carried out in a sustainable fashion.
- 2.4 Bedford Borough sits in a key location within a national area of strategic importance, being at the heart of the Oxford-Cambridge Arc (‘the Arc’). Whilst the timetable for the Local Plan does not align with that of the Arc Spatial Framework, our client supports the approach being taken by BBC of progressing the Local Plan in advance of the Arc Spatial Framework and consider it is crucial that the Plan is adopted in a timely fashion.
- 2.5 Representations put forward by Cloud Wing provide a detailed explanation of the national, sub-regional and local context for employment needs. AWG, having reviewed those representations, **fully support the case put forward by Cloud Wing** in their representations and do not seek to replicate those arguments here.
- 2.6 The Cloud Wing submission is based upon up-to-date market evidence at all scales (national, sub-regional and local) and, crucially, **demonstrate that the targets for employment growth in the Local Plan significantly fall short of what is required to meet identified and future needs** in the Borough.
- 2.7 AWG consider that **the employment needs** proposed in the Draft Local Plan 2040 **do not fully capture recent economic trends** nor consider the wider national and sub-regional context of significant economic growth planned within the region or the Arc.
- 2.8 Bedford Borough sits at the heart of the Arc, whilst the A421 and East-West Rail are key movement corridors through the Arc and wider sub-region. Whilst it is acknowledged that the Arc Spatial Framework is currently lagging behind the timetable for BBC’s Local Plan, sufficient knowledge and evidence for the ambition and scale of growth to be delivered in the Arc exists.
- 2.9 **The current strategy of deferring decisions on housing and employment growth until the next Local Plan review is not a sound approach;** it is not positively prepared planning for a spatial strategy that will cover some 20 years. Even with a review in 5 years’ time (as is suggested in the Local Plan), that would be close to the midpoint of the Local Plan on the basis that this Local Plan is not

likely to be adopted until 2024 (if submission is in 2023). Moreover, the requirement is only that a Local Plan Review is commenced in 5 years' time, not completed, so **any future review would not be completed until after 2030**.

- 2.10 This approach contrasts the approach taken by other authorities within the Arc, including Oxfordshire who are currently consulting on a new Local Plan (Oxfordshire Plan 2050) which specifically sets out that part of its purpose is to influence and shape the emerging Arc Framework. **Failure to positively plan for the Arc now would reduce the Borough's ability to influence the direction and vision for the Arc through the Borough.**
- 2.11 As a result, the approach set out in the Draft Local Plan significantly underestimates the scale of economic development needed and envisaged within the wider sub-region. It also risks Bedford losing out on the substantial benefits associated with this growth to other parts of the Arc. **The Council's evidence, therefore, needs to be updated including to reflect recent trends and market signals and align with the wider ambitions for the sub-region.**
- 2.12 Within this context **any employment land requirement should clearly be set as a minimum rather than a ceiling** on employment-generating development in the Borough. BBC should adopt a similar approach to Central Bedfordshire Council ('CBC') in their recently adopted Local Plan. In the case of CBC, who share many similar characteristics with BBC in terms of employment market and needs, the Local Plan allocated a significant quantum of strategic employment land over and above the identified needs, as the Council (accepted by the Local Plan Inspectors) acknowledged that future employment growth is diverging from historic market trends, and that there is a chronic undersupply issue.
- 2.13 Whilst CBC had initially suggested this could be put to a future Local Plan Review, they took the positive approach of planning for these needs now, recognising the significant economic boost that will bring. It is crucial that BBC adopt a similarly positive approach in the Local Plan and do not progress a 'do minimum' strategy.
- 2.14 The Local Plan should also have regard to the changing nature of jobs within the employment market and the evidence base is presently misleading in this regard. The **Employment Land Supply incorrectly asserts that the logistics sector does not generate highly skilled jobs**. Whilst that may have been the case 10-15 years prior, modern logistics operations employ many highly skilled workers, and this is only set to increase in the future with further automation and robotics.
- 2.15 Furthermore, many logistics buildings now incorporate large areas of office within them, meaning that they also deliver E Class (former B1) jobs that would otherwise not come forward.
- 2.16 The **Local Plan strategy fails to adequately recognise the difference in employment development and needs versus housing needs**. Employment development is generally driven by demand from actual occupiers. It is important to note that **there needs to be a range of unit sizes available to meet demand as it arises** from occupiers who will have different requirements according to the nature and size of their businesses.
- 2.17 Occupiers' need for new facilities is generally immediate because it arises from the demands of their businesses. Businesses are rarely able to plan accurately more than 12 months in advance, where delivery of new employment, even on allocated land, can take 18 months to deliver. Accordingly, **there need to be**

employment sites identified well in advance which are capable of meeting need as it emerges. As a result, **there needs to be a “surplus” of allocated land against identified needs** to ensure there are sufficient sites available which can meet a range of demands quickly.

- 2.18 This in turn provides the opportunity to meet market demand in a sustainable, planned fashion, i.e. through a Local Plan, rather than through ad hoc planning applications on unallocated sites because the Local Plan has not provided sufficient employment land.
- 2.19 The Draft Local Plan recognises the strategic importance of the A421 rail-based growth corridor in unlocking and delivering growth in the area. However, it fails to recognise the unique opportunity presented by the Bedford Business Park in this location, instead contemplating the allocation of smaller, piecemeal business parks and other small employment sites. This approach does not appear to be soundly based and would not be capable of delivering the scale of investment or diversity of economic growth that could be delivered by Bedford Business Park.
- 2.20 The Bedford Business Park (and in particular the land at Broadmead) is considered in more detail in Section 5 of these representations.

Plan Period

- 2.21 Turning to the matter of Plan length AWG contend that the Plan Period should run to 2050. A period to 2040 is only 10 years beyond the existing Local Plan and is not a sufficiently long enough extension to effect real change.
- 2.22 As the Council will be aware, strategic growth and development, along with wide scale change, takes many years to deliver. Sites take a long time to plan correctly and then commence delivery, and thus a longer Plan Period should be allowed for.
- 2.23 Furthermore, by extending to 2050, this would bring the Plan in line with others in the Arc, such as the MK2050 Vision and the Oxford 2050 Plan. Given the strategic and important role that Bedford Borough plays within the Arc, **it would represent ‘good planning’ and a holistic approach to align the Local Plan Period with those other areas.** The next review of the Local Plan would then not need to extend the Plan Period, but instead revise housing and employment growth to reflect the latest position as relevant at that time.

3.0 Climate Change

- 3.1 The first statement contained within the Local Plan's Vision (Chapter 2) rightly sets **an aim of tackling climate change and adapting to and mitigating its effects being at the heart of new development** in the Borough.
- 3.2 This is then reinforced, with Theme 1 (p.13) setting an objective to making Bedford Borough a carbon neutral Borough. The draft Local Plan, however, does not currently carry this commitment through in such a way as to suggest meaningful action.
- 3.3 Firstly, **the Local Plan does not include any proposed strategy or approach concerning renewable energy development**. If the Borough is serious about becoming carbon neutral and tackling climate change, **it is essential that the Local Plan includes positive policies which encourage both renewable energy developments, and net zero carbon developments**, to come forward.
- 3.4 The NPPF is clear (Chapter 14 – para 152 in particular) that the planning system should, inter alia, support renewable and low carbon energy and associated infrastructure. Para 153 states that Plans should take a proactive approach to mitigating and adapting to climate change.
- 3.5 Moreover, para 155 states that Plans should both provide a positive strategy for energy from renewable and low carbon sources and consider identifying suitable areas for such developments.
- 3.6 The Local Plan fails to tackle this issue. As currently drafted, it lacks any meaningful proposals or aims in order to meet these requirements of national policy.
- 3.7 In the same fashion that the Local Plan has considered issues and options around future growth (scale, location, pattern etc), this iteration of the Local Plan should have also included options proposing a positive strategy for energy from renewable and low carbon sources, including potential locations.
- 3.8 It must also **encourage growth that comes forward where renewable energy goes hand in hand with development proposals, with positive policies encouraging such developments** (be they as allocations and/or applications) to be considered favourably. The NPPF makes particular reference (para 155 c) to identifying opportunities for development to draw its energy supply from decentralised, renewable, or low carbon energy supply, and for co-locating heat customers and suppliers.
- 3.9 Of particular concern is the lack of any focused evidence base document(s) addressing these matters. The list of Local Plan 2040 Supporting documents provided by the Council is absent any topic papers, studies or the like which address these matters.
- 3.10 It is essential that BBC undertake such work as a matter of urgency to inform the next stage of the Local Plan. **AWG propose that the Local Plan will need to include policies allocating sites for renewable energy, as well as allocating strategic developments which could come forward alongside renewable energy**.

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- 3.11 The Sustainability Appraisal ('the SA') should also be updated to reflect this requirement. **The climate crisis is a significant, national issue and the SA methodology must be amended to provide greater weighting to matters relating to climate change and energy.**

4.0 Development Strategy

- 4.1 The previous Issues and Options consultation outlined six potential approaches to growth as follows: urban based; A421 based growth; rail growth; East West Rail northern station growth; dispersed growth; and new settlement based growth.
- 4.2 These six options have now been progressed and as set out in the Local Plan and Development Strategy Topic Paper (June 2021); BBC now seek views on four ‘preferred options’ to meet the (proposed) level of growth set out in the Local Plan.
- 4.3 The options put forward in the Local Plan are as follows:
1. Option 2a: Development in and around the urban area, plus A421 transport corridor with rail-based growth parishes and southern parishes;
 2. Option 2b: Development in and around the urban area, plus A421 transport corridor with rail-based growth parishes and southern parishes, plus one new settlement;
 3. Option 2c: Development in and around the urban area, plus A421 transport corridor with rail-based growth parishes, plus two new settlements;
 4. Option 2d: Development in and around the urban area, plus A421 transport corridor with rail-based growth parishes, southern parishes, and eastern parishes, plus one new settlement;
- 4.4 All four proposed options include development along the A421 transport corridor, and rail-based growth in the south of the Borough. It is of note that the map alongside each image fails to recognise the proposed new East-West rail station that would be located north of Stewartby (potentially alongside Bedford Business Park). This station would further justify the choice to progress a growth option focused on the A421 and rail corridor.
- 4.5 AWG supports the proposed strategy of growth along the A421 and rail corridor. However, AWG consider that each of the proposed options fail to identify sufficient land to meet the employment needs of the Borough (as set out in Section 2 of these representations and in the Cloud Wing representations).
- 4.6 The Development Strategy Topic Paper states (para 3.13) that 123ha is proposed to be allocated to 2040, based on the Employment Land Study. For the reasons set out in Section 2, that figure is not considered to be sound and needs to be increased. This would, in turn, result in a requirement for the proposed Development Options (and the final selected Option) to identify further areas for employment growth.
- 4.7 As well as an insufficient quantum of employment land, AWG contend that 3 of the 4 options may result in insufficient delivery within the Plan period. Firstly, **Option 2c is not considered a sound approach**. As has been evidenced¹, the development of large sites (2,000+ dwellings) takes many years. The average time quoted from validation of the first planning application to the first dwelling being completed on schemes of 2000+ dwellings is 8.4 years. Whilst this relates

¹ Start to Finish, Second Edition, Lichfields February 2020

to dwellings, Option 2c proposes up to 20ha of employment as part of a new settlement. It is reasonable to assume that the 20ha would come forward as part of a holistic approach to a new settlement. **The employment could, therefore, be constrained by the delivery of the new housing and associated infrastructure demands.**

- 4.8 The same report also finds that the average annual build-out rate for a scheme of 2000+ dwellings is 160dpa.
- 4.9 Working on the basis of a plan led system, any application for a new settlement would, in theory, not be validated until after the Local Plan is adopted, thus 2024 at the earliest. This means that **any new settlement is unlikely to begin delivering homes until 2032 at the earliest, and potentially employment land until a similar time.**
- 4.10 The approach set out in Option 2c may not meet the Borough's employment needs in the short term and could **result in employment delivery beyond the plan period and should be discounted as a result.**
- 4.11 The criticisms of Option 2c would apply, to a lesser extent, to Options 2b and 2d, with the same quantum of employment proposed for one settlement (as opposed to two in the case of Option 2c).
- 4.12 The option which has the greatest likelihood of delivering growth within the Plan period, as required by national policy, is Option 2a. This option would focus growth in the south along the major transport corridors of the A421, A6 and railway line, and in turn would focus development in the most sustainable locations.
- 4.13 **The Development Strategy Topic Paper finds (para 3.19) that Option 2a is the best performing option.** It also finds Option 2c to be the worst performing of these 4 options, and that is without considering the issue of delivery as set out above.
- 4.14 Whilst Option 2a is the best of the options put forward, for the reasons set out in Section 2 of these representations, the proposed level of growth in Option 2a is not sufficient to meet the identified needs for the Borough.
- 4.15 **A new Development Option is therefore required which meets the identified growth needs and, in particular, the opportunity presented by Bedford Business Park to maximise growth in the A421 rail-based growth corridor. This Option would then be the favoured one to progress in the Local Plan, being for some 222ha of employment growth in this location.**
- 4.16 The next section of these representations puts forward a case as to why the **land at Broadmead, and in turn the Bedford Business Park, would deliver growth in accordance with the Development Strategy outlined above** (in fact according with 4 of the 4 development options).

5.0 Land at Broadmead, Marston Vale

- 5.1 The Broadmead Site has been submitted as a 96ha site for strategic employment development. At this scale, **it would be capable of delivering in the region of 335,000sqm of gross employment floor space in an excellent location for strategic employment growth.**
- 5.2 The site is promoted as part of the wider scheme put forward by Cloud Wing known as Bedford Business Park; however, it is also capable of coming forward separately in the event that Bedford Business Park did not progress. **The Site is in a single ownership, is available and is deliverable, being actively promoted by AWG in conjunction with Cloud Wing.** It is not reliant upon any third parties and would be capable of “consuming its own smoke” in terms of infrastructure, as well as being delivered in the Bedford Business Park. **The Site could, therefore, be delivered early within the plan period as evidenced by the live planning application across the entire Bedford Business Park.**
- 5.3 Located adjacent to the railway line, **the Broadmead Site is in a sustainable location where it can be accessed by sustainable, non-vehicular means of transport.** Employees and visitors could access the site by rail (including the future East-West Rail station), whilst it is also a commutable cycling distance from Stewartby, Wixams and Wootton.
- 5.4** The land falls within all of the aforementioned Development Options and would contribute to meeting those needs. **This can be best done as part of the wider Bedford Business Park, and is included within the live planning application for Bedford Business Park.**
- 5.5 The Council’s assessment of the Site (ID 745 on its own, ID809 as part of the Bedford Business Park) in the Site Assessment Pro Formas (June 2021) document has been carried out at a higher level of assessment than the Local Plan. The submitted planning application demonstrates that there are no overriding constraints to development that would preclude the scheme proposals from coming forward.
- 5.6 The application addresses all technical areas, but in particular matters such as: landscape and visual impact; minerals; agricultural land; flood risk and drainage; utilities; ecology; and highways. The more detailed level of scrutiny that the application is subject to (and far more detailed evidence and assessments) supersede the high-level comments contained in the Site Assessment Pro Formas.
- 5.7 As renewable energy providers, AWG confirm that development here can make an important contribution to responding to climate change. Strategic employment developments include large expanses of roof space, which can be designed to accommodate solar panels to help meet the energy demands of the development.
- 5.8 They are also increasingly designed with electric vehicle charging infrastructure, including for HGVs as well as employee/visitor cars.
- 5.9 The site is in a sustainable location adjacent to a railway station, and accessible by cyclists and pedestrians from nearby settlements. It would**

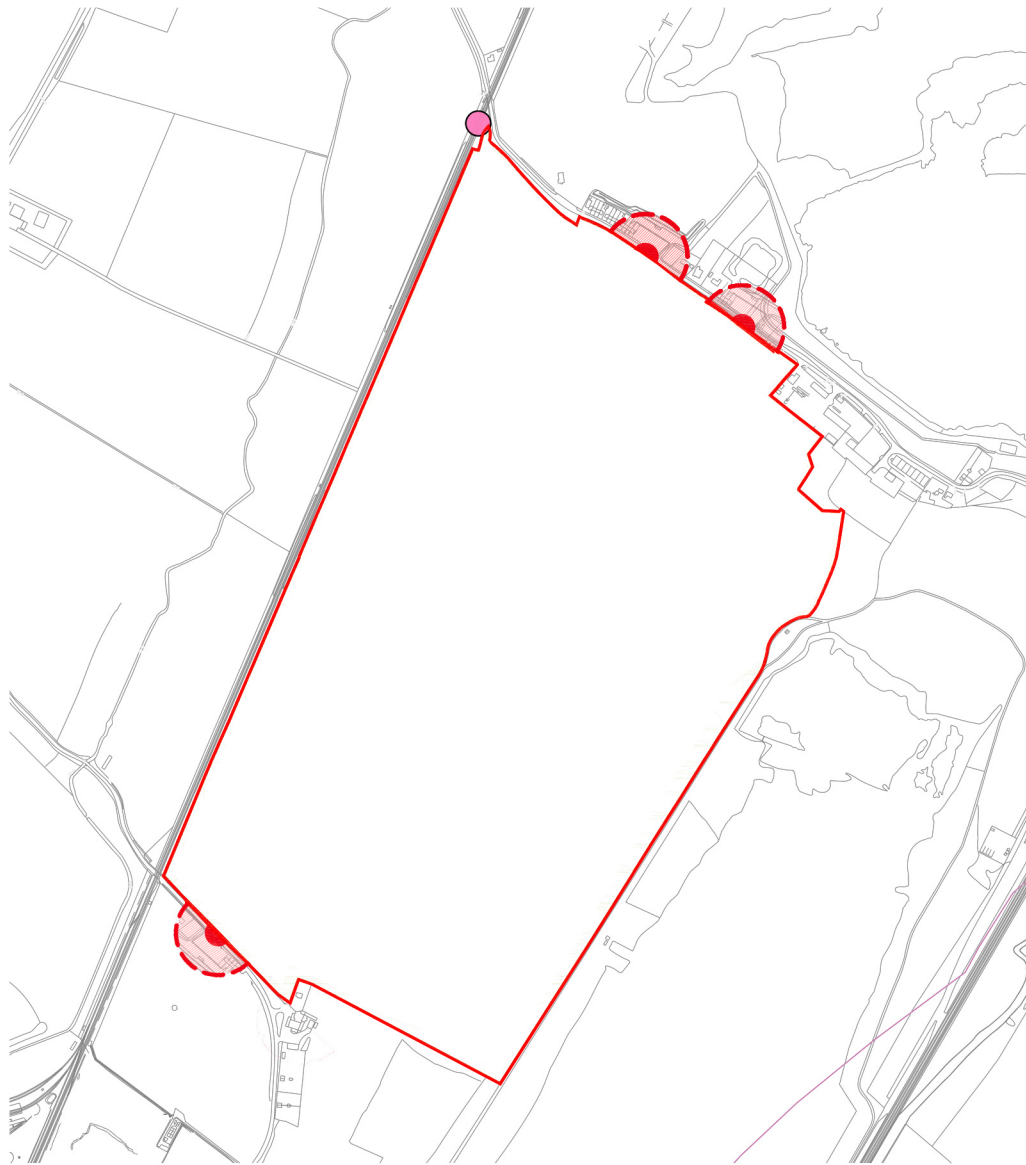
therefore not be reliant upon private vehicles for access, helping to minimise vehicle emissions.

- 5.10 The level of analysis and assessment contained in the application, which covers the entirety of the Broadmead Site, is far greater than would normally be found for sites being assessed at this stage of the Local Plan process. The work confirms the suitability of the site and that **there are no technical constraints preventing it from progressing through the various stages of the Local Plan**. Indeed, it should be proposed as an allocation in the Local Plan as the Review document is prepared.
- 5.11 **The proposed Bedford Business Park, which includes the land at Broadmead, should therefore be allocated for employment development within the Local Plan** to meet identified needs throughout the whole plan period.

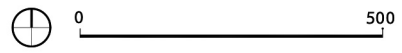
6.0 Summary and Conclusions




- 6.1 These representations have been prepared on behalf of Arnold White Group, a strategic landowner and promoter with a proven track record of delivery of housing, commercial and renewable energy developments in Bedfordshire.
- 6.2 This response finds that the emerging Local Plan does not meet employment needs. The level of employment growth proposed in the Plan is not sufficient to meet local needs, nor does it facilitate Bedford Borough's active shaping of the Arc Spatial Framework in this area.
- 6.3 The Plan also fails to adequately address climate change, with a complete failure to meet the NPPF requirements and an absence of any evidence base documents that grapple with this issue.
- 6.4 The representations propose a new Development Strategy Option which would provide a significant uplift in employment growth in the south (A421 rail-based corridor) to be taken forward in the next iteration of the Local Plan.
- 6.5 Furthermore, the representations demonstrate that the Bedford Business Park, including the land at Broadmead, should be allocated for commercial development in accordance with the evidence base and proposed Development Strategy.

Appendix 1: Site Location Plan



Broadmead, Marston Vale



-  Site boundary
-  Potential access points
-  Railway station / local halt



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