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For and on behalf of



**BEDFORD LOCAL PLAN 2040 –
DRAFT PLAN STRATEGY OPTIONS AND DRAFT POLICIES CONSULTATION**

Land off Moor End Lane, Radwell (Radwell Lakes) – LPA Ref: 703

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1.0 INTRODUCTION AND STRUCTURE OF REPRESENTATIONS

- 1.1 This representation has been prepared by **DLP Planning Ltd (DLP)** on behalf of [REDACTED] in response to the Bedford Borough Council Local Plan 2040 consultation.
- 1.2 DLP, on behalf of [REDACTED], welcomes the Council's decision to review and update the various elements of the extant Development Plan and provide for a new Local Plan document that will fully reflect the policies of the National Planning Policy Framework (the Framework) and provide for the up-to-date development needs of the Borough and its residents in a sustainable manner.
- 1.3 Our client's site at Radwell Lakes should be considered in this context. The details submitted illustrate the opportunity for a sustainable contribution towards an appropriate spatial strategy that would satisfy key elements of the proposed Sustainability objectives and requirements for development. A location plan identifying the site is provided at Appendix 1.
- 1.4 The submitted site at Radwell Lakes, and the surrounding land, holds significant potential to provide mixed use leisure orientated development including pub/restaurant/hotel/wedding & events venue and potentially holiday lodges/homes linked to water based recreation in an attractive location. As part of the details submitted for our client's site at Radwell Lakes, we confirm that this location is free from overriding constraints to availability or suitability and that access can be provided.
- 1.5 DLP wishes to make a number of comments on the consultation document as part of the background context to the representations we are submitting on the site itself.
- 1.6 [REDACTED] have concerns over the past failings of the Borough to capitalise on its locational context and the previous long-standing planning strategy that saw a concentration of development in the urban areas of Bedford and Kempston and the parallel restraint of development in rural areas.
- 1.7 Within this context, this consultation response points out that the site Land off Moor End Lane, Radwell Lakes has been omitted to the detriment of sustainable rural tourism and leisure growth which would meet both local needs and benefit the local economy, and should be considered as part of the Local Plan. This representation should be read alongside other

submissions relating to our client's wider interests that provide more detailed comments on the approach to the emerging Plan.

- 1.8 **Section 2.0** addresses specific comments on the Council's Preferred Strategy Options and Preferred Option Policy Proposals together with their supporting evidence.
- 1.9 **Section 3.0** discusses the suitability of our client's land for development including a response to the Council's Site Assessment Proforma.

2.0 OBSERVATIONS AND REPRESENTATIONS – PREFERRED STRATEGY OPTIONS AND PREFERRED OPTION POLICY PROPOSALS AND EMERGING EVIDENCE

2.1 This section addresses the Council's the Published Consultation Document.

Comments on Strategy Options / Proposed Approach and Supporting Evidence

Paragraph 1.10 (alignment with the Spatial Framework)– Comment

2.2 The Council's Preferred Options published for consultation contend that they draw heavily on the 'pillars' of economic development and the natural environment from the emerging Spatial Framework. The representations identify that the Council's published consultation proposals fail to embrace the comprehensive approach to supporting sustainable development anticipated in the Spatial Framework. Paragraph 1.10 of the consultation document ignores altogether the place-making 'pillar' of the Framework while the Preferred Options as a whole are overly reliant on assumptions regarding improvements in strategic-level connectivity. This fails to embrace local opportunities for sustainable development.

Reasoning

2.3 It is surprising, and inconsistent with national policy and the emerging objectives of the Arc Spatial Framework, makes no mention of the connectivity or place-making pillars of the Spatial Framework. Each should be considered of equal importance.

2.4 Specifically, paragraph 4.1 of the consultation document 'Creating a Vision for the Oxford-Cambridge Arc places significant emphasis on reducing the need to travel. Connectivity is not just about strategic road/rail links - it means:

"improving communities' access to the services they need – like a good quality, sustainable water supply and broadband, schools, cycle lanes and healthcare, as part of a great approach to place-making."

2.5 Paragraph 4.4 also states the importance of recognising the needs of an ageing population in terms of service delivery. At Paragraph 4.5 the document goes on to explain:

"the policies of the Framework will be used to create a clear infrastructure plan giving communities access to the public services they need – including education and health".

2.6 The settlement hierarchy in Bedford Borough means that Rural Service Centres and Key Service Centres across the authority have a key role in delivering these requirements for

sustainable communities and serving a wider rural hinterland – both in terms of immediate needs and their role throughout the plan period. The strategy in the Local Plan 2030 has deferred important decisions relating to these priorities both in terms of avoiding the reclassification of centres such as Oakley and in placing the requirement to allocate sites upon Neighbourhood Plans. Priorities have therefore not been addressed and in any event the current strategy has only sought to address a foreshortened period to 2030.

Remedy

- 2.7 The Council's Preferred Options consultation proposals offer no scope to address these local requirements for place-making and connectivity as part of a comprehensive strategy. This is as a result of identifying no requirement for additional village-related growth outside of the 'east' or 'south' transport corridor parishes. Opportunities for sustainable development in accordance with these requirements (and the objectives of the emerging Spatial Framework) must be embraced both in the period to 2030 (to address the immediate uplift in the need for growth) and across the entire Plan period to sustain the role and function of the Borough's most sustainable settlements.

Section 2 (Draft Vision) – Comment

- 2.8 The recognition of tourism and recreation as part of the Council's Vision to 2040 is supported in principle as is recognition that enhancement to the Borough's green infrastructure network and natural environment are key components of this offer. The delivery of new multi-functional green spaces and Country Parks is also appropriate in principle as a means of securing these benefits.
- 2.9 The principle of these objectives is supported but is reliant on flexibly supporting diverse opportunities for development across the settlement hierarchy. There are a substantial number of centres where the level of development identified is sufficient to secure the opportunities identified.
- 2.10 This is reinforced by the 'Themes' underpinning the Plan (notably Theme 1 'Greener' and Theme 4 'Better Places'). However, we consider that the approach to the preparation of strategy options and in-particular focusing potential benefits on large-scale strategic growth in the Milton Keynes-Bedford Waterway south of the town (and at existing commitments in Brickhill) means that the Vision is not effective and not positively prepared.

2.11 This principally results from the failure to identify a contribution from any village-related growth outside of the ‘east’ and ‘south’ corridor parishes as part of the Council’s Preferred Options. This fails to recognise that at locations in the north of the Borough the aims of the Council’s Vision can be secured sustainably through appropriate village extensions, complemented by opportunities for rural recreation and tourism such as our client’s land at Radwell Lakes.

Paragraphs 3.15 – 3.17 (Spatial Strategy Options) – Object

2.12 The emerging preferred options put forward by the Council have an urban focus and the four variations all focus development on the urban area, A421 corridor, and existing and planned rail stations. This approach relies heavily on rail investment and also focuses growth to the south of the town, with very little growth planned to the north of the Borough.

2.13 Recreation and leisure growth are focused on either historic strategies or within the Council’s urban centres, including Bedford Town.

2.14 In setting out options within the Council’s Development Strategy Topic Paper the Council makes no allowance for the potential delivery of green infrastructure and benefits for tourism, recreation and leisure associated with each proposed approach. This means that the potential positive effects for village-related growth north of the Borough have not been assessed in site-specific or settlement-specific detail prior to rejecting this as component of the strategy. This is compounded by failing to assess other opportunities for tourism and recreation outside of the Council’s preferred strategic locations.

2.15 Embracing these opportunities is necessary to ensure that the selected strategy option is consistent with national policy to support a prosperous rural economy. Specifically, Paragraph 84(c) of the NPPF2021 notes that policies and decisions should enable sustainable rural tourism and leisure developments which respect the character of the countryside. Paragraph 85 of the Framework recognises that sites suitable to meet these needs will not necessarily be within or adjacent existing settlements but warrant support where improvements to non-car access can be secured and severe impacts on the highway network can be avoided.

2.16 The Site Land off Moor End Lane, Radwell (Radwell Lakes) is unique in the Borough and represents an optimal location to provide a bespoke leisure and recreation venue. The

development of this facility would support healthier communities, complement the leisure infrastructure available to current and future residents.

Remedy

- 2.17 Therefore, as part of a 'hybrid' approach recommended by our clients as an appropriate strategy it is necessary to reassess levels of development within the northern KSC and RSC, where there is both demand for development and also the available sites to aid in the delivery of housing post 2030. These strategy options should also aim to support rural tourism and rural leisure opportunities. The Site Land off Moor End Lane, Radwell is an exceptional asset in the countryside. It offers an optimal location to provide a bespoke outdoor sports, leisure and recreation facilities potentially linked with innovative visitor accommodation. Currently, there are certain projects referred to in the Local Plan, but these only cover a small number of parcels mainly south of the Borough.
- 2.18 This has important implications for the assessment of effects in the Council's draft Sustainability Appraisal. For example, the 'uncertain' findings for rejected **Option 3c** incorporating village-related growth for **Objective 7** (encourage physical activity) and **Option 13** (community facilities) should be amended in recognition of the potential benefits and opportunities to be considered as part of site selection. Such an approach would also allow the identification of suitable opportunities for biodiversity enhancement and mitigation to overcome potential negative effects that the Council identifies as part of more dispersed approaches.

Policy TC2 (Out of centre development) – Comment

- 2.1 The policy sets out that new retail, leisure, and office development is required to locate in Bedford town centre, Kempston district centre and the local centres as defined in Policy TC1S – Hierarchy of town centres. If no suitable sites are available, edge of centre locations should be considered and only if suitable sites are not available should out of centre sites be considered. Principally we support Policy TC2 in terms of its support for out-of-centre development subject to an assessment of potential impacts. However, in terms of the opportunities and development of tourism and leisure uses required to achieve the Council's Vision and Objectives the policy fails to provide sufficient flexibility in terms of how these should be assessed for the purposes of decision-taking or achieved as part of the wider strategy.

- 2.2 In terms of opportunities for rural tourism and recreation including the creation of green infrastructure, these aims should be secured through the allocation of our client's strategic opportunity at Radwell Lakes.
- 2.3 Should the land not be selected for allocation Policy TC2 should be modified to introduce exceptions for retail and leisure development in order to provide support for development (such as rural tourism and recreation) that is not compatible with Town Centre locations but would complement the Plan's wider strategy.
- 2.4 This exception should be provided subject to suitably worded policy criteria (such as arrangements for access and controls over future use) to ensure no adverse impact on Town Centre locations. Such criteria could be satisfied in the case of our client's land at Radwell Lakes while also enhancing the benefits of other village-related growth.
- 2.5 This is necessary in order to provide flexibility so that the Local Plan can respond quickly to a changing commercial market.

3.0 RESPONSE TO SITE ASSESSMENT PRO-FORMA (CALL FOR SITES ID 703)

Introduction to Site and Proposals

3.1 The site was previously submitted to the Council for consideration as part of the Council’s ‘call for sites’ exercise in August 2020. The land area being promoted is shown below.



Figure 1: Land off Moor End Lane, Radwell (Radwell Lakes)

3.2 Land off Moor End Lane, Radwell extends to approximately 135 hectares and comprises, in addition to farmland, substantial areas of former gravel workings that over time have become lakes that are currently used for fishing and other open-air, informal leisure uses (see figure 1 below). There is a crescent of lakes west of the A6 and the River Great Ouse. There is also a small lake on the southwest corner of the site. A designated cycle route runs parallel to the A6. Moor End Lane lies to the north of the site forming the boundary along its northern tip.

There is a railway line which is located on the western side of the site.

- 3.3 The village of Radwell is located circa 230 metres to the west of the railway line. The eastern part of the site is in flood zone (3b) (functional floodplain) and there is a small pocket of land in flood zone (3a) to the northwest. Access to the site is provided via a private road that is owned and controlled by parties related to [REDACTED]. There are two existing access points onto into the public highway in the vicinity of Radwell. The site forms part of the Upper Great Ouse River Valley.
- 3.4 Owned entirely by one party, the site offers an opportunity to provide for an expansion of tourism and leisure use, including, but not limited to, water sports and water-based recreation; ancillary restaurants, cafes and/or public houses; recreational based retail outlets; and accommodation - lodges, eco camping; camping pods or glamping.
- 3.5 Similar examples of such development have been seen elsewhere in the region at Stanwick Lakes (East Northants) and on a smaller scale and linked with a specific pastime at Box End Aqua Park (Bedford Borough).

Response to Borough Council's Site Assessment Pro-Forma (Site ID: 703)

Site Assessment Criteria

- 3.6 We have reviewed the Council's assessment of the site and wish to make a number of comments below. In terms of the assessment proforma more generally the Council has failed to take account of the potential net benefits associated with the proposed leisure and tourism uses, referring incorrectly to (for example) proposed industrial development in assessing potential impact on groundwater and indicating the potential to generate congestion.

Within or adjoining the urban area or a defined settlement policy area boundary

- 3.7 The proposed nature of uses at the site indicates that its location in the rural area outside of existing settlements does not represent a constraint to leisure and tourism uses. The site offers significant potential to provide mixed use leisure development including pub/restaurant/hotel and holiday homes in an attractive location. As part of the details submitted for our client's site at Radwell Lakes we confirm that this location is free from overriding constraints to availability or suitability and that access can be provided.

Habitats and Protected Species

- 3.8 While the Council's proforma notes the presence of protected species and uncertain impacts on habitats given the site's importance for nature conservation this fails to take account of the extensive land area (over 145ha) or existing uses within the site. Subject to further consideration by the Council it would be appropriate to ensure that areas of greatest potential impact are avoided and opportunities for mitigation and enhancement can be provided based initially on the findings of a Preliminary Ecological Appraisal including Phase 1 Habitat Survey and protected species surveys including reptiles and bats.

Impact on designated or non-designated heritage assets or their setting

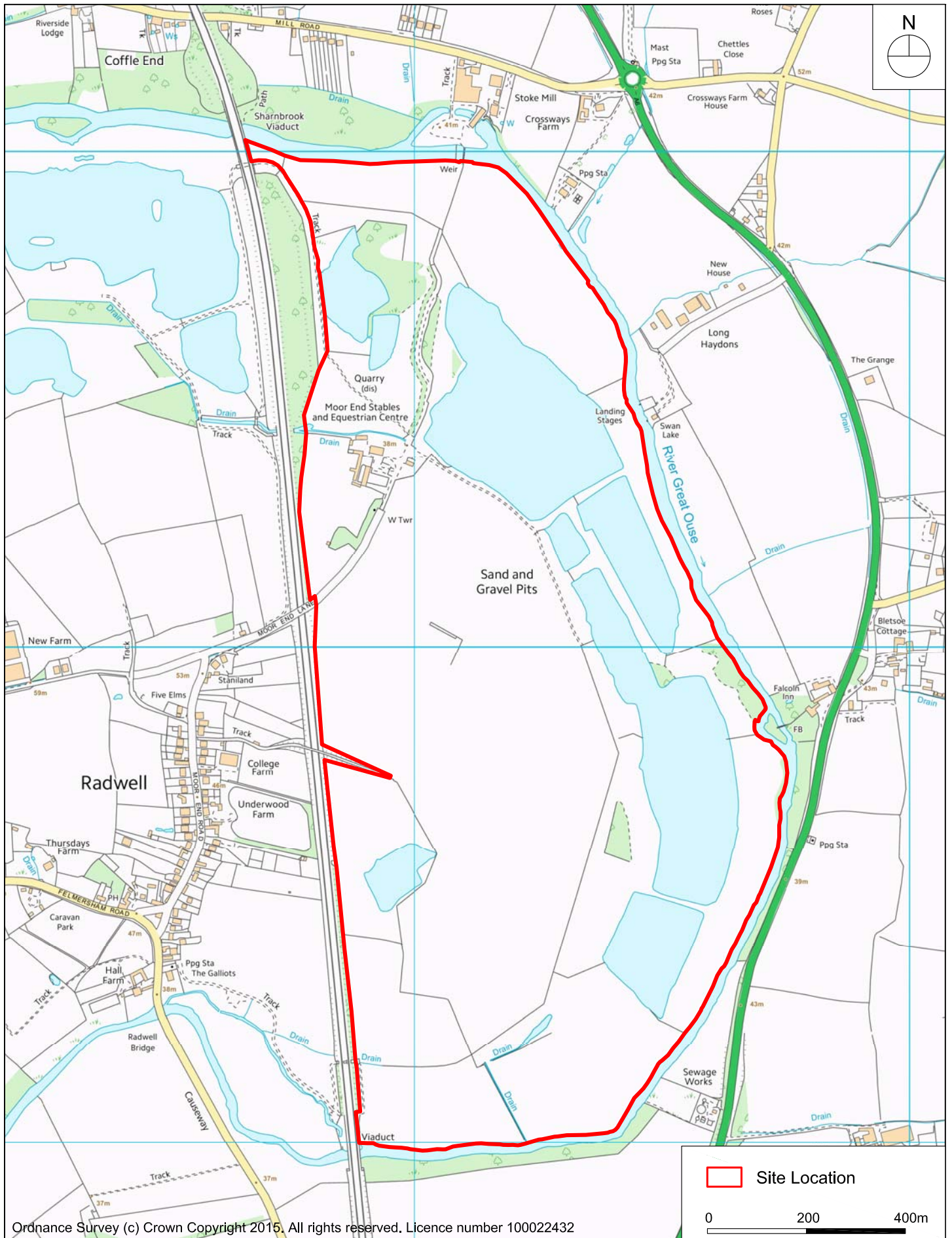
- 3.9 The Call for Site's assessment found that the proposal has the potential to cause harm to heritage assets, which may range from low to high. This is a finding applied to the majority of the Council's assessment pro-forma.
- 3.10 In relation to the proposed leisure and recreation uses at the site, and given the substantial land area, these would not represent any significant change to the contribution that the site makes to the setting of any designated or non-designated heritage assets. There will be options to avoid, reduce or mitigate this harm and where sites have not been ruled out altogether for other reasons, further assessment will be undertaken to more fully explore impacts on significance and options for harm reduction and mitigation.

Impact on highways


- 3.11 The Council's assessment notes that the site is located east of Radwell village approximately 7.5 miles north of Bedford town centre. The closest bus stop located west in Radwell village approximately 750m of the site. The Council's assessment takes no detailed account of the proposed leisure and tourism uses at the site nor its existing function including the provision of fishing lakes and open air leisure. Assessment for the intensification of these uses would result in materially less impact on the highways network than development of the whole site (as implied by the suggestions in the Council's pro-forma).
- 3.12 A Transport Assessment will be developed to assess the impact of the development on the highway network, particularly along the Moor End Lane, together with an assessment of feasibility of the numerous options available to improve access, if required. Appropriate policy

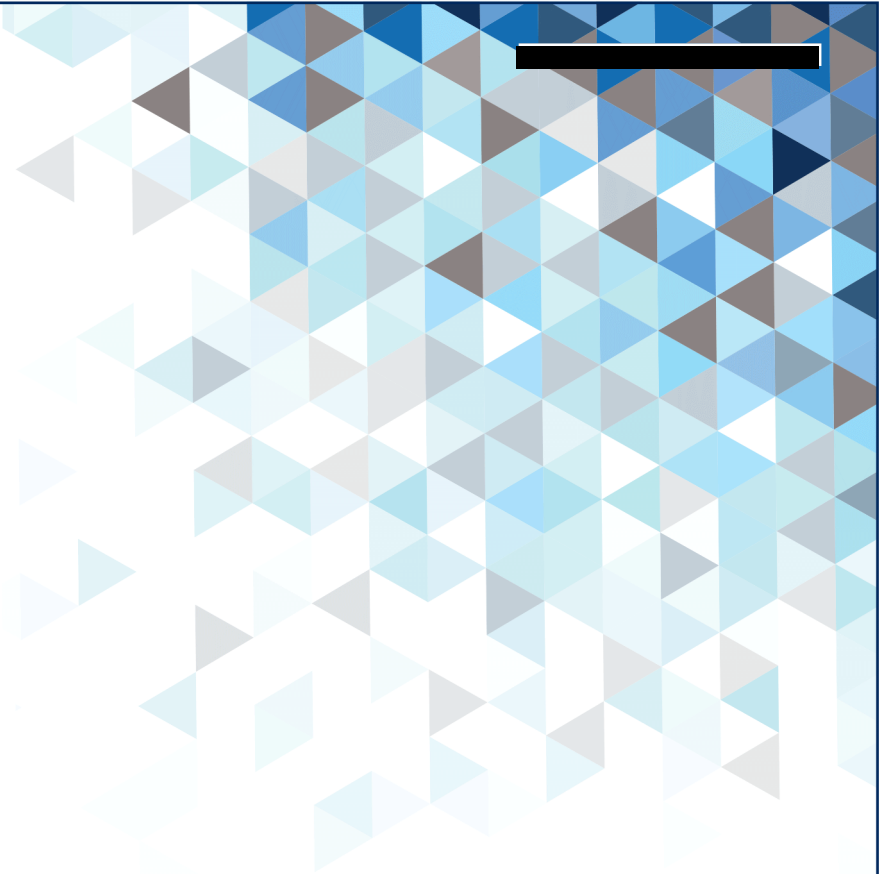
criteria could also be provided to support development of a Travel Plan taking account of existing walking routes within and adjoining the site.

Appendix 1 Land off Moor End Lane, Radwell (Radwell Lakes) Site Plan (ID: 703)



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PROJECT Bedford Local Plan 2032 Radwell Lakes	DRAWING TITLE Location Plan			Offices also at: Bristol, Cardiff, Leeds, London, Milton Keynes, Nottingham, Rugby and Sheffield



[Redacted]

BEDFORD
Planning / SDD / SPRU

[Redacted]

BRISTOL
Planning / SDD / SPRU

[Redacted]

EAST MIDLANDS
Planning/ SDD

[Redacted]

LEEDS
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