

**BEDFORD BOROUGH LOCAL
PLAN – DRAFT PLAN STRATEGY
OPTIONS RESPONSE
ON BEHALF OF HAMPTON
BROOK (UK) LTD**

Table of Contents

1.0	Introduction	2
2.0	Level of Growth Required	4
3.0	Growth and Spatial Strategy Options	5
4.0	Site Assessments	7
5.0	Summary and Conclusions	8

1.0 Introduction

- 1.1 This Issues and Options representation is made on behalf of Hampton Brook (UK) Ltd who have land interests to the north of Bedford off Manton Lane.
- 1.2 The site was put forward for consideration through the Call for Sites process in 2020, reference ID481.
- 1.3 This representation sets out a number of comments in relation to the proposed strategy set out in the Draft Strategy and Options Document as well as setting out the merits for including the land at Manton Lane as an allocation in the emerging Local Plan.

Land north of Manton Lane, Bedford

- 1.4 Hampton Brook are promoting land to the north of Manton Lane as a suitable site for an employment allocation.
- 1.5 The site is 1.53 hectares and is located within the existing Manton Lane Industrial estate on the edge of Bedford. The site comprises an unused playing field which is in private use and inaccessible to the public. Historically, this land was used for recreation by the Aircraft Research Association (ARA), however it has not been used for this purpose for some time. It is noted that this site is not subject to any open space designations in the adopted development plan.
- 1.6 The site is largely unconstrained, for example: there are no topographical constraints, it is located within flood risk zone 1, it is not subject to a landscape or heritage designation and does not contain any public rights of way, and where constraints have been identified, i.e. Park Wood Local Nature Reserve, these can be appropriately addressed through mitigation.
- 1.7 To the south of the site there are a range of existing employment buildings, to the east are buildings associated with the ARA, to the west and north there are open fields with planning permission for a secondary school, which was granted permission at appeal in April 2019 (appeal ref: APP/K0235/W/18/3203051).. It is noted that the existing employment buildings that surround the site form part of a key employment area 'Manton Industrial Estate' in the adopted Local Plan.
- 1.8 The site has the potential to connect directly to the existing highway network on Manton Lane. Strong public transport options would also be available for employees with the industrial estate is served by public transport routes 6 and 20 and provide regular services to Bedford Town Centre and Brickhill. These can be accessed from bus stops located a 10-minute walk away on Manton Lane/Brickhill Drive.
- 1.9 The area surrounding the site, which now has consent for the school, was designated as land to be protected and developed for employment use under Policy 70 of the Local Plan 2030. As such, the employment need that was to be delivered on this site will no longer be met and replacement land will need to be found. This is discussed in more detail below.

- 1.10 The site will be one of the most suitable put forward for employment development through the Call for Sites process due to its location within the urban area of Bedford, and proximity to, and integration with, an existing employment area. The existing employment buildings/use make this location an appropriate environmental context for an employment allocation. The site has access to key roads which already serve Manton Industrial Estate.
- 1.11 As the site is in private ownership, the wider public do not benefit from the continued identification of this site as a playing field (as was established through a recent request for pre-application advice). Additionally, the ARA no longer have a need for the field, meaning it is a significantly underutilised resource within the urban area. In line with Sports England policy, the loss of this facility could be mitigated against through investment to improve off-site facilities which would mean that as well as delivering employment opportunities, the release of the land for development would lead to enhanced open space provision in the local area.

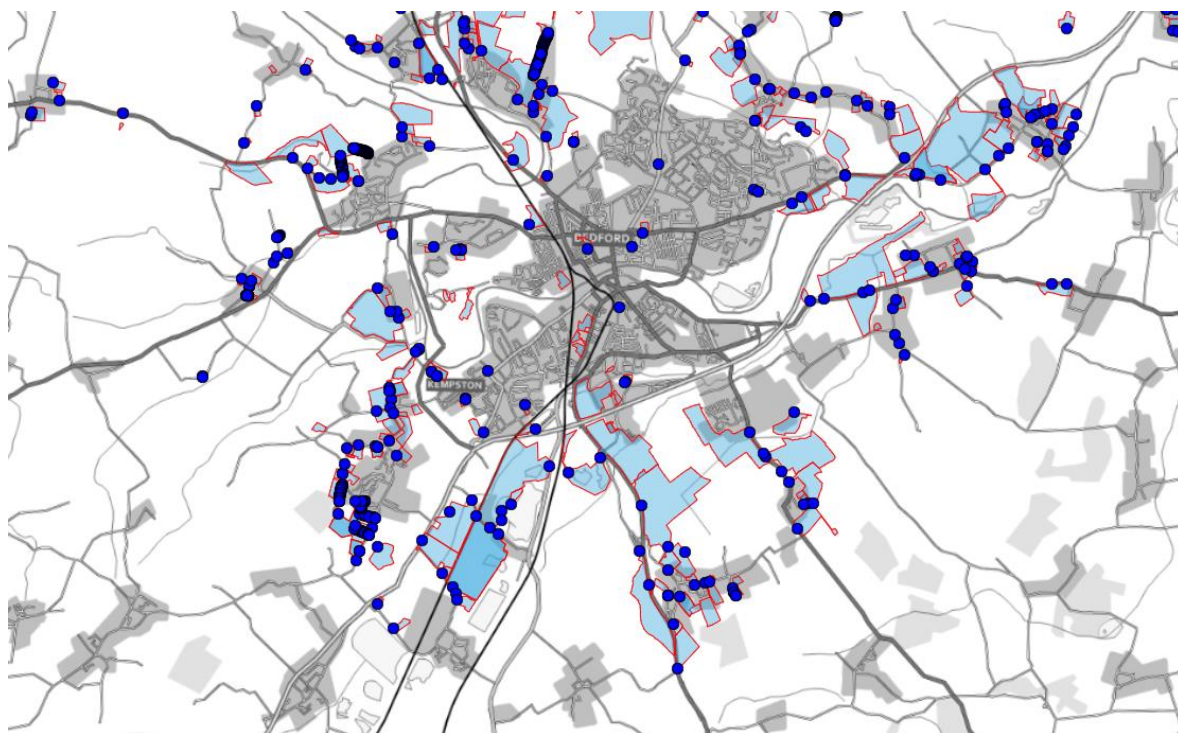
2.0 Level of Growth Required

- 2.1 Chapter 3 of the consultation document identifies that 171 hectares of new employment land will be required up to 2040. There are 48 hectares of employment supply identified in the District, it is therefore expected that the emerging Local Plan will need to identify 123 hectares of land in order to meet employment needs.
- 2.2 When planning for employment land required, the Local Plan 2040 should include a buffer in order to allow a choice in the market, alongside a range of site typologies in order to meet different requirements in the market. Whilst Chapter 3 acknowledges that there is a shortfall of 123 hectares of land, a further buffer of 10% should be applied to this figure and therefore the plan should be looking to allocate 135 hectares of employment land to allow for this flexibility.
- 2.3 Bedford Borough is located in the central area of the Oxford to Cambridge Arc. The vision for the Arc anticipates a significant level of residential and economic growth in the local authority as part of wider aspirations for the area. Consideration should therefore be given as to whether there is a need to go beyond the 135 hectares to maximise economic benefits for the area and deliver the arc vision. As is discussed further in the next section, given the limited opportunities for growth around the edge of Bedford, a starting point for this should be ensuring opportunities within the urban area, such as at Manton Lane, are taken to avoid the need to make difficult decisions about the release of agricultural land for development.

3.0 Growth and Spatial Strategy Options

- 3.1 The Development Strategy Topic Paper states that at the Issues and Options stage, the most popular options for growth were within the existing urban area, the A421 corridor and rail-based locations. The Sustainability Appraisal identified that urban growth and urban edge growth are the most sustainable approach to new development. This position is supported by Hampton Brook.
- 3.2 However, a substantial number of the sites that have been submitted to the Local Authority for consideration as potential development sites are being promoted as residential housing sites as opposed to employment land.
- 3.3 Additionally, it is noted in Chapter 3 of the consultation document that the Council wish to utilise both larger and smaller sites for use as employment sites. This indicates that opportunities outside those large sites in the A421 corridor will need to be identified moving forward. The Manton Lane site promoted by Hampton Brook, within an existing industrial site, is prime example of the type of site the Local Planning Authority should be looking to allocate to complement the inevitable strategic allocations.

Figure 1: Call for Sites Map Extract



- 3.4 The four Growth Options put forward by the Council all intend to deliver up to 51 hectares of employment on the edge of Bedford. Development on the edge of Bedford is constrained to the north/north-east as a result of issues such as landscape, topography, flood plain and potential coalescence with smaller settlements. There is also a pressure to deliver residential development within and on the edge of Bedford also and many of the available sites will be more suited to this use. This pressure reinforces the essential need to fully assess all available opportunities in the

urban area and a finer grain assessment of site availability needs to be undertaken to inform the development strategy.

- 3.5** For example, Hampton Brook's site in Manton Industrial Estate was historically used for playing fields, however, as noted above, the site is now the only opportunity available to increase the employment provision on this existing employment area due to the recent appeal decision to grant planning permission for a school on surrounding land. Given its surrounding context, the land is an ideal site for employment use with limited environmental constraints. There are options for mitigating the loss of the playing fields and indeed the current playing fields are not publicly accessible.

4.0 Site Assessments

- 4.1 From an initial review of the potential employment sites submitted to the Local Planning Authority for consideration, the conclusions to not appear to be underpinned by a detailed evidence base or all of the available to the Council.
- 4.2 The site assessment forms also fail to provide any detailed assessments or conclusions on key topics. Before any site selection process is undertaken, each site should be properly assessed and a firm conclusion reached on whether key areas such as highways, heritage, noise, etc. are an insurmountable issue or not. Additionally, and importantly, the site assessment form also does not allow for a consideration of the potential benefits that sites may offer.
- 4.3 The assessment process for sites should be thorough and draw information from an existing evidence base held by the Council. To be sound, and justify the selection of sites, there should be a greater degree of transparency in the site assessment process. This is an important consideration as it is noted that plans in other local authorities have been found unsound in recent years due to the failure to justify decisions and properly back up why certain sites have been chosen over others.
- 4.4 With regard to the land at Manton Lane, the only constraint to development is the historic use of the site as a sports pitch – the development of which could trigger a Sports England objection. This is effectively a policy constraint and should not be a reason for not allocating the site which is otherwise suitable for development.
- 4.5 On the site proforma, there are unsubstantiated references to potential harm to unmanned heritage assets. It is unclear what these assets are and how the conclusion has been drawn and indeed whether they take into consideration the impact of building out the consented school on the heritage assets. Similarly, there are ‘uncertain’ conclusions around matters such as ecology and biodiversity. These are examples of where the Council will need to commission further evidence to fully assess sites and enable a robust consideration of alternatives.
- 4.6 The benefits of allocating the site should also be recognised in the assessment process, particularly the fact that the use of the site can effectively replace the employment land lost to the approval of a secondary school on the adjacent site.

5.0 Summary and Conclusions

- 5.1 This representation has detailed a number of comments that Hampton Brook have with the Draft Strategy Options.
- 5.2 The Council should include a suitable buffer for the amount employment land requirement in order to avoid under delivery and to create flexibility in the supply. The Council should also ensure that the Council properly plans for the wider economic aspirations of National Government given Bedford Borough's prominent position at the centre of the Oxford to Cambridge Arc.
- 5.3 Hampton Brook support the approach of the Council put forward in all four development options to focus employment growth in and on the edge of the urban area of Bedford. It will be important for the Council to thoroughly assess development site options, particularly as a result of the limited number of sites available for employment use in such a highly sustainable location, and recognise where alternative land uses may result in a great benefit to the public.
- 5.4 The site assessment process should thoroughly assess the suitability of sites, drawing upon all available evidence to substantiate information. Additionally, the process needs to reflect the particular benefits the development on individual sites can deliver.
- 5.5 Whatever the final strategy selected by the Local Planning Authority, the land at Manton Lane should be allocated for development given its availability, suitability for development and location within a successful existing employment area.