

**BEDFORD BOROUGH LOCAL PLAN 2040
STRATEGY OPTIONS AND DRAFT POLICIES
CONSULTATION JUNE 2021**

**SUBMISSION ON BEHALF OF WYBOSTON LAKES LIMITED IN RELATION TO
FUTURE BUSINESS & RESIDENTIAL DEVELOPMENT OPPORTUNITES AT THE
WYBOSTON LAKES COMPLEX, GREAT NORTH ROAD, WYBOSTON,
BEDS. MK44 3AL**

Prepared by: [REDACTED]

For and on behalf of Brown & Co.

Brown & Co is a leading provider of agency, professional and consultancy services across the whole range of rural, commercial, residential, and agricultural markets.

Date: August 2021.

Reference: Wyboston 014207

1.0 Introduction

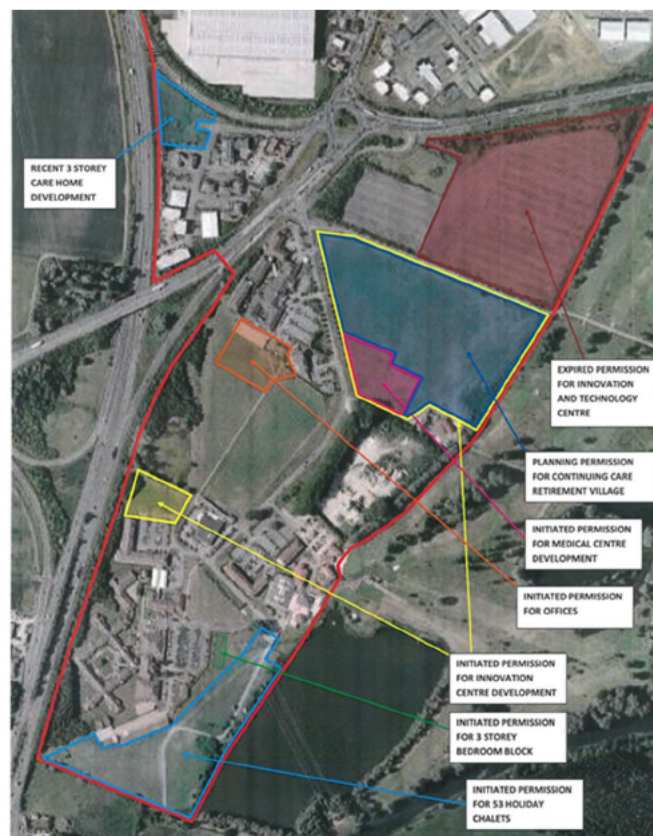
- 1.1 Brown & Co have been instructed to submit the following Statement on behalf of Wyboston Lakes Limited in response to the Bedford Borough Council's Strategy Options and Draft Policies Consultation June 2021 and in support of the future allocation of land at the Wyboston Lakes Complex, Great North Road, Wyboston for wider business and residential development uses.
- 1.2 Over the past 30 years more than £45m has been invested at the Wyboston Lakes Complex to create a unique business, training and leisure facility (including the largest training centre in the country), which is now one of the major employers in Bedford Borough. The development of the site has had the support of the Borough Council, which has granted numerous planning permissions for a wide range of buildings and uses across the site. In 2012 Wyboston Lakes Limited acquired adjoining land from the East of England Development Agency with planning permission for around 18,500 sq metres of business development, which is now incorporated into the overall Wyboston Lakes Complex site.
- 1.3 Despite the Borough Council's support for investment and development over many years, the Wyboston Lakes development has historically been subject to the open countryside restraint policies, and this has created an anomalous position. The Local Plan 2030 adopted in January 2020 has provided more certainty for further growth on the site through Policy 73, however, the policy refers specifically to development that '*supports and enhances its role as a regional centre for leisure, training and conferencing*'. The supporting text also refers to the opportunity for 'small scale' research and development "B1" use class employment, but this is at odds with previous permissions granted by the Council and the inclusion of the former East of England Development Agency land, which is now part of the site. Additionally, residential planning permission has been granted for the development of a Continuing Care Retirement Village comprising 128 care apartments and village care centre comprising 61 care bedrooms, 49 care suites, restaurant, dining rooms, lounges, cafe, shop, hairdressing salon, activities rooms, gym, swimming pool and associated works. This permission has been lawfully commenced and is therefore 'saved', and this has recently been acknowledged by the Council with the grant of a Certificate of Lawfulness for Proposed Development (Ref. 21/00471/LDP).
- 1.4 Given the 'saved' and current planning permissions for business and residential development uses on the site, and the strategic growth options identified in the Strategy Options and Draft Policies Consultation, the Wyboston Lakes Complex is considered appropriate for allocation within the Local Plan Review for a range of employment and residential uses. This will support and complement the Plan strategy options to concentrate growth in proximity of the A421 transport corridor and a proposed new rail station at St. Neots/Tempsford and contribute to the emerging policies for the Oxford to Cambridges Arc.
- 1.5 The purpose of this statement is to set out the background to the applicant's proposals and the key planning issues raised by them. The statement is structured as follows:
Section 2: describes the physical characteristics of the **site context & background**;
Section 3: reviews the **emerging plan strategy key points**;
Section 4: summarises the **development options for the wyboston lakes complex**;
Section 5: provides an **overall assessment summary**.

2.0 Site Context & Background

- 2.1 In location terms the Wyboston Lakes Complex is on the edge of St. Neots and with its already developed form this is generally perceived to be part of the town's urban conurbation. A market town with a population of more than 30,000, St. Neots offers a wide range of local services and facilities and is a focus for growth in the adopted Huntingdonshire Local Plan, which identifies its potential to provide an additional 4,000 houses over the next 15 years.
- 2.2 The Complex has good access to the strategic road network having the A1 and A428 Trunk Roads on the western and northern sides, and the East Coast Main Rail Line to the east providing a 40 minute service to Kings Cross. The planned east-west new rail link is also expected to include a new train station south of St Neots, within proximity of the Complex. Situated adjacent to the Bedfordshire and Cambridgeshire County boundaries the Wyboston Lakes Complex offers the opportunity for growth that will improve local job opportunities and help stimulate sustainable economic growth in both Bedford Borough and Huntingdonshire, as well as contribute to the Oxford to Cambridge Arc.
- 2.3 The Wyboston Lakes business & leisure village extends to an area of 15.42 ha (382 acres) enjoying extensive riparian frontage to the River Great Ouse. Within the site there are three self-contained training centres and hotel services with 406 on-suite bedrooms, full catering/dining facilities and bars, conference suites, serviced office accommodation and a supporting wide range of facilities arranged informally throughout the site. These sit amidst a unique and extensive leisure and recreation centre that supports an 18 hole golf course, driving range, putting green and practise area with golf instruction, fitness centre, indoor swimming pool, spa, beauty treatments, restaurants, fishing and water sports centre with skiing lakes, jogging trail and nature walks. The village is a gated area with a security lodge and CCTV at the main entrance.
- 2.4 The training centres have a diverse client base drawn from local, regional, national and European locations. The Home Office established a regional office of the National Crime Agency (NCA) on the Village and Firebrand Training UK established their UK residential training centre on the Village in 2009 that welcomes more than 20,000 delegates a year onto their information technology and project management courses. Overall, the Complex employs more than 650 people with support from a substantial number of local businesses.
- 2.5 Although the site is characterised by low density development with extensive and established planting providing attractive riverside parkland, this exhibits a clear built-up character with a diverse mix of developments, which will be consolidated by the already permitted proposals.
- 2.6 To the north west there is the Phoenix Business Park and further north there is the St Neots administrative area with recent office, industrial and storage development on the Colmworth Business Park and a substantial warehousing building and retail development on Alpha Park. Beyond this there are the residential areas of the Eaton Socon and Eaton Ford, which are part of St Neots. The County boundary between Bedfordshire and Cambridgeshire follows the east-west A428.

Planning History

- 2.7 The site has a substantial planning history with the following ‘Saved’ Planning permissions that have been initiated, but yet to be completed:
- 2,417 sq. m of knowledge centre planning permission granted in 2002 – LPA Ref. 01/02676/FUL.
 - Three storey bedroom block granted in 2003 – LPA Ref. 03/03100/FUL
 - 1,672 sq. m of training support offices granted planning permission in 2005 – LPA Ref. 05/00817/FUL
 - Innovation Centre development with 11,305 sq.m of floor space - LPA. Ref. 01/00338/FUL.
 - Medical Centre - LPA Ref. 10/00007/MAF
 - 53 Holiday Lodges - LPA Ref. 13/00762/EXTM
 - Continuing Care Retirement Village comprising 128 care apartments & a village care centre providing 61 care bedrooms, 49 care suites with restaurant, dining rooms, lounges, café, shop, hairdressing salon, activities rooms, gym, swimming pool & associated works – LPA Ref. 10/02007/MAO & 18/01843/MAR
- 2.8 Although now time expired, it is highlighted permission has previously been granted by the Borough Council for an Innovation and Technology Centre with 18,500 sq. m of Class B1 floor space (LPA ref. 08/01890/MAO) on the land south of the A428 (former East of England Development Agency land).
- 2.9 The locations of the approved development are identified on the plan below.



Overview

- 2.10 The Complex has clearly been regarded appropriate for a wide range of imaginative development proposals and the current and permitted uses comprise a wide mix of interrelated activities. By reference to the classifications in the Town & Country Planning (Use Classes) Order 1987 (as amended), these include: Retail shop (Class E(a)); Restaurant (Class E(b)); Innovation Centre and Offices (Class E(c)); Hotel (Class C1); Residential Training centres (Class C2); Residential dwellings (Class C3); Medical Centre (Class E(e)) and Dance Hall & Leisure (Class E(d)).

3.0 Emerging Plan Strategy Key Points

- 3.1 The Borough Council's June 2021 Development Strategy Topic Paper identifies the Local Plan 2040 will need to achieve a minimum of 1,275 dwelling completions a year to comply with national planning guidance, which represents a 'step change' 33% increase on the current adopted Local Plan annual target. Over the plan period this equates to at least 12,500 additional dwellings to be allocated in the new Local Plan. Taking account of the planned population growth to 2040, a further 123 ha of new employment land will also need to be allocated in the new Local Plan. In parallel with the preparation of the Local Plan review, the Government is taking forward a spatial strategy for growth within the Oxford to Cambridge Arc.
- 3.2 Whilst the Topic Paper concludes that growth within the Bedford urban area would perform best in sustainability terms, it also concludes this option would have unacceptable significant impacts. The Strategy Options Consultation therefore focuses on 4 growth options with around 3,000 new dwellings and up to 51 ha of employment development within and adjoining the Bedford urban area. To assist in meeting the additional growth requirement, 3 of the 4 options identify a new settlement at Wyboston of 2,500 dwellings or/and a new settlement at Little Barford of 3,085 dwellings along with up to 20 ha of employment, in proximity of the A421 transport corridor and a proposed new rail station at St. Neots/Tempsford.
- 3.3 The Development Strategy Topic Paper reviews the strengths and weakness of the different growth options and in respect of the potential new settlements it identifies the following:

Key strengths:

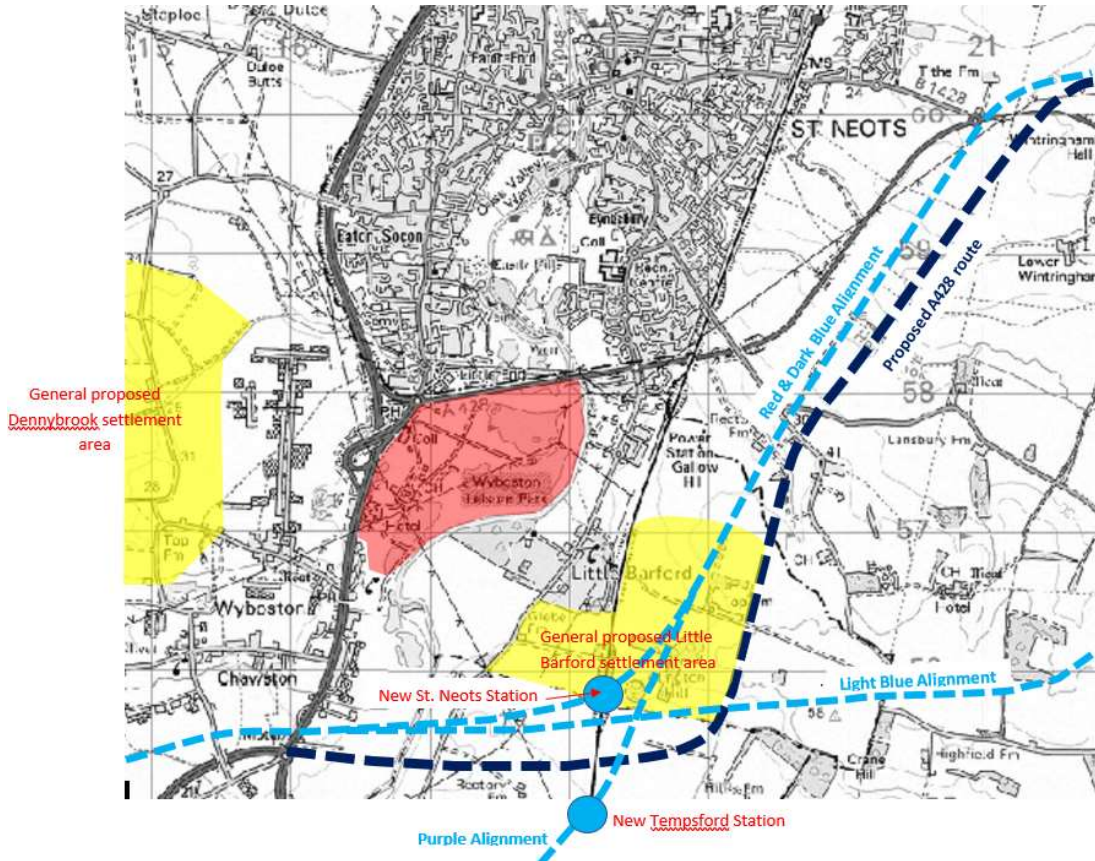
- Opportunity to establish a new planned community at Wyboston and/or Little Barford in proximity to the proposed EWR station at St Neots/Tempsford. Little Barford has a stronger relationship and proximity to EWR (but there is a possibility that EWR may also constrain development capacity – see weaknesses).
- Development in this location would create a second focus for major development which could potentially impact positively on housing delivery rates.

Weaknesses and delivery challenges;

- In common with all new settlement proposals, a new settlement at Wyboston and/or Little Barford would have a relatively long lead in time, with a very high risk of a housing shortfall in the early to middle years of the plan.
 - Four of the five EWR routes that are being consulted upon pass through the Little Barford site and the deliverability of this proposal will require further assessment following the decision on the route alignment.
 - Both proposals will involve the loss of agricultural land, though development at Wyboston would lead to the loss of higher grade agricultural land.
 - The key challenge will be the delivery of two new settlements in close proximity to one another and the ability of the housing market to deliver them simultaneously.
- 3.4 For the reasons justified by the Borough Council the new settlement growth options at Wyboston and Little Barford are perceived to have benefits in contributing to meeting the authority's future housing and employment needs, which is reflected in their inclusion in 3 of the 4 consultation options.

4.0 Development Options for the Wyboston Lakes Complex

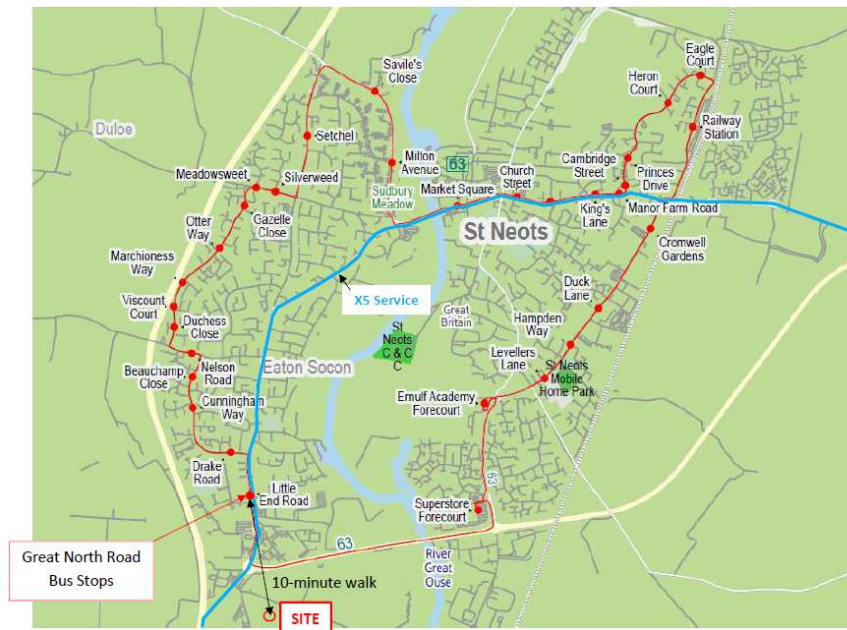
- 4.1 Considering the consultation options, it is apparent these overlook the opportunity for well related strategic ‘mixed use’ development at the Wyboston Lakes Complex on land that has been put forward in the ‘Call for Sites’ consultation. As the plan below illustrates, the Complex is well related to the potential new settlement locations and in proximity of the A421 transport corridor and the proposed new rail station at St. Neots/Tempsford.



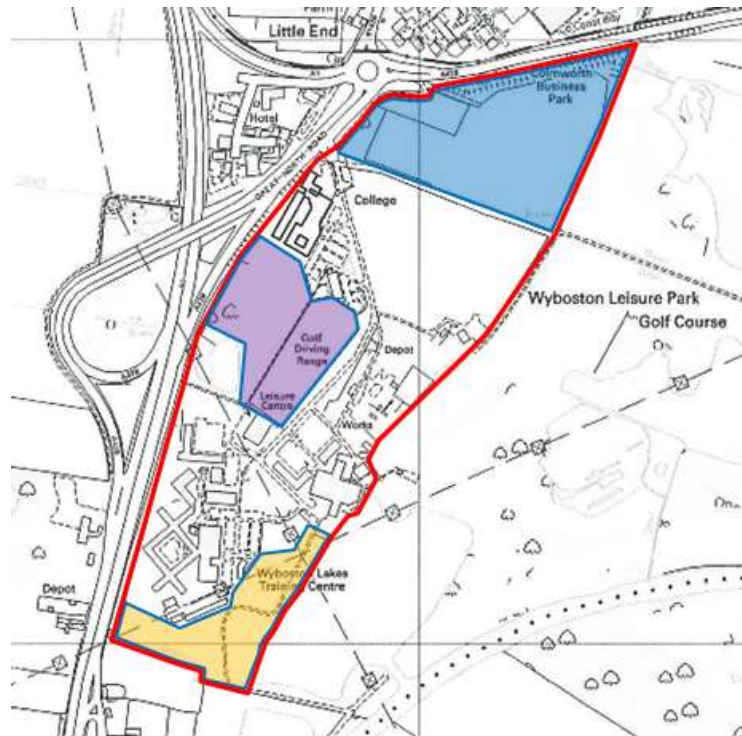
Wyboston Lakes Complex shaded light red, new A428 alignment dark blue and potential rail routes light blue.

- 4.2 In locational terms the Wyboston Lakes Complex is already generally perceived to form part of the wider St. Neots conurbation area and due to its contained nature with existing development on at least two of its sides it would not represent an ‘urban sprawl’. It is also in a very accessible location with its proximity to roads and public transport, and a range of supporting facilities such as shops and leisure all within walking distance.
- 4.3 In relation to public transport connectivity, the Complex is within a 10-minute walk of bus stops on the Old Great North Road where the X5 bus service between Cambridge and Oxford and the local town bus service can be accessed. Inevitably these public transport services will be expanded to serve the new rail station and with its location relative to St. Neots and the new station, the Wyboston Lakes Complex is well placed to benefit from the improved transport services.

ST. NEOTS BUS SERVICE ROUTES



- 4.4 Generally, with the allocation under Local Plan Policy 73, the Borough Council must be satisfied further development can come forward on the Complex without harm to the landscape or the setting of the wider area; transport issues; drainage or flood issues, or infrastructure difficulties.
- 4.5 The land put forward for allocation in the Call for Sites extends to 21.2 ha. and comprises the three parcels shaded blue, purple and orange on the plan below.



Residential Development Proposal (blue area)

- 4.6 The blue shaded area extending to 7.8 ha. has historically had planning permission for the development of a hotel and Innovation and Technology Centre with 18,500 m² of Class B1 floor space (LPA ref. 08/01890/MAO), along with commercial storage and with the previous commercial activity **the site is regarded to be previously developed land.**
- 4.7 In relation to the suitability of the land for residential development, it is highlighted the Council has already approved the development of the Continuing Care Retirement Village comprising 128 care apartments & a village care centre providing 61 care bedrooms, 49 care suites with restaurant, dining rooms, lounges, café, shop, hairdressing salon, activities rooms, gym, swimming pool & associated works Immediately to the south of the blue area.



Already granted Continuing Care Retirement Village to the south of the proposed residential allocation.

- 4.8 The residential development of the blue land will clearly relate well to the already approved residential Continuing Care Retirement Village in land use terms, and with the grant of this development the Council must have been satisfied the site can provide an appropriate living environment.
- 4.9 In sustainability terms, **the residential allocation would realise** the following:
- **development in proximity to a range of services and facilities within easy walking distance;**
 - **re-use of previously developed land;**
 - **available access connections with scope for improved pedestrian crossings, though it is highlighted the proposed realignment of the A428 will result in the current A428 road being re-trunked;**
 - **avoid the loss of agricultural land;**
 - **development without harm to the landscape or the setting of the wider area (reflected in the previous permissions granted by the Council);**
 - **readily available existing infrastructure and services already on the Complex;**
 - **avoid land that is not constrained by flood issues etc.**

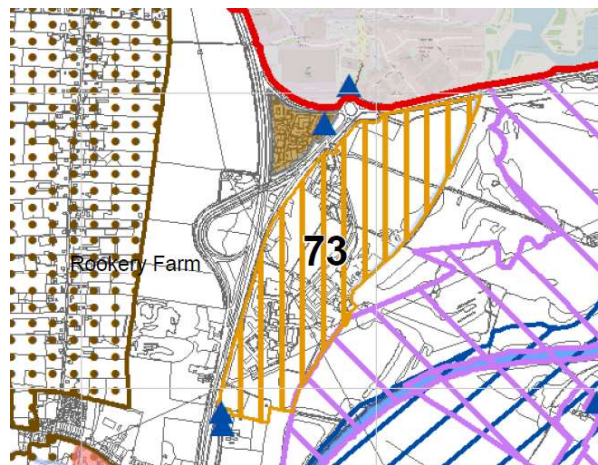
- 4.10 With its location the residential area is considered suitable for high density housing at circa 65 dph that could yield 500 dwellings. This benefits from established screening along its northern and western edges, and the significant green amenity provided by the golf course along the eastern edge.



Potential residential area edged red.

Employment area proposals (Purple & orange areas)

- 4.11 Policy 73 of the adopted Local Plan already identifies the Complex for further potential business related development and Paragraph 11.30 of the Plan clarifies ‘In policy terms Wyboston Lakes is in the countryside but it is in close proximity to the A428 and A1 transport corridors as well as the urban area of St Neots. The site’s location provides an important opportunity for both London, Peterborough north/south connections as well Cambridge, Milton Keynes east/west connections. The site is partly developed for various recreation, leisure and hotel, conference and training uses providing a wide range of predominantly non “B” use class employment within a low density landscaped setting’.



Proposals Map extract.

-
- 4.12 The area shaded purple extending to 4.4 ha. comprises the golf driving range and amenity land with currently limited use. With the development of computer golf ranges and swing analysers the driving range is considered to have a limited future, enabling the area to be bought forward for further employment development. The area could potentially deliver business premises with a floor space of circa 13,000 m², assuming 30% site coverage.
- 4.13 The area shaded orange extending to 3.3 ha. has the benefit of a 'saved' planning permission for development of 53 holiday chalets (LPA Ref. 13/00762/EXTM). However, as an alternative this area is considered to have potential for further employment uses. The area could potentially deliver business premises with a floor space of circa 10,000 m², assuming 30% site coverage.

5.0 Overall Assessment

- 5.1 The proposals outlined above in conjunction with the existing approved development will achieve a sustainable mixed-use development and paragraph 105 of the National Planning Policy Framework notes, such developments can have the benefit of *“limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making”*.
- 5.2 The proposals outlined will help meet the more immediate housing need, improve local job opportunities, and help stimulate sustainable growth in both Bedford Borough and Huntingdonshire. It will also have the benefits of the suggested new settlement proposals in terms of proximity of the A421 transport corridor and a proposed new rail station at St. Neots/Tempsford, with further advantages such as the use of previously developed land, existing infrastructure, and nearby facilities. Additionally with its smaller scale it is potentially suited to smaller developers and paragraph 69 of the National Planning Policy Framework notes small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.
- 5.3 The Borough Council’s June 2021 Development Strategy Topic Paper identifies the Council will have to make a ‘step change’ in the delivery of new housing growth. However, a new settlement at Wyboston and/or Little Barford will have a relatively long lead in time. Additionally, four of the five EWR routes being consulted upon pass through the Little Barford site, and the deliverability of this proposal and the potential number of dwellings it might deliver will require further assessment following the decision on the route alignment. Given these uncertainties, the Wyboston Lakes Complex proposal outlined above is readily available and can come forward now, without being dependant on strategic infrastructure decisions. The proposals are therefore able to assist in meeting the more immediate housing and employment land shortfall in advance of the potential longer-term settlements coming forward.