

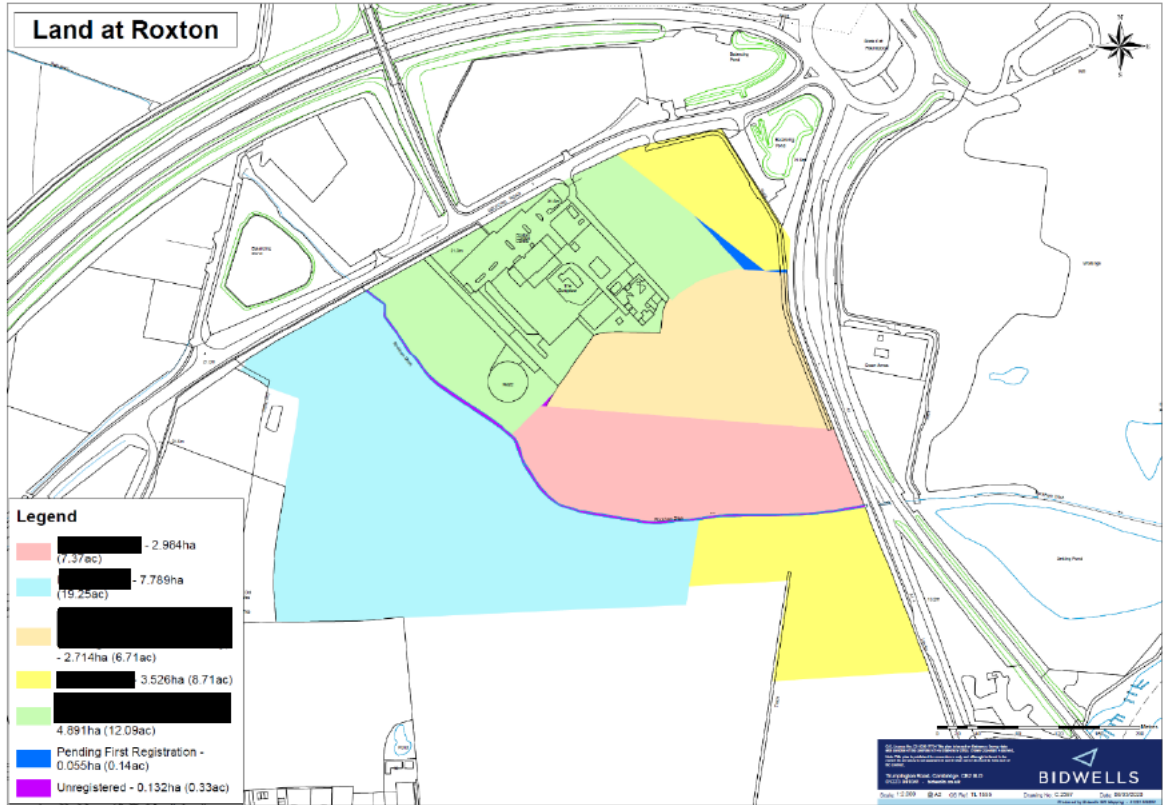
**BEDFORD BOROUGH LOCAL
PLAN – DRAFT PLAN STRATEGY
OPTIONS RESPONSE
ON BEHALF OF THE
LANDOWNERS**

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1.0 Introduction

1.1 This Issues and Options representation is made on behalf [REDACTED] (the 'Landowners'), who own land at Roxton. The plan below illustrates the extent of our Clients land ownership.



Site Plan illustrating Site Ownership

1.2 The site was put forward for consideration through the Call for Sites process in 2020 (Site ID Reference: 1355)

1.3 The Strategy Options document that is being consulted on was prepared ahead of the publication of the revised National Planning Policy Framework 2021 (NPPF). A requirement was introduced within Paragraph 22 of the revised NPPF for Local Plans proposing new settlements or urban extensions to towns/villages to be set within a vision which looks at least 30 years ahead. Paragraph 22 will apply to the Bedford Borough Local Plan based on the transitional arrangements that have been put in place and as a result, the Council will need to undertake additional work to establish a longer-term vision for the Local Plan 2040.

1.4 This representation sets out a number of comments and concerns in relation to the proposed strategy set out in the Draft Strategy and Options Document.

Land at Roxton

- 1.5 This site is considered to have significant potential for commercial development and is available for development within the plan period.
- 1.6 It is located in a strategically important position, to the south-west of the Black Cat Roundabout between Bedford Road and the Great North Road (A1). Access to the site would be provided via two access points from Bedford Road. An additional emergency access point could be provided should it be determined to be required.
- 1.7 The site benefits from exceptional access to the existing and proposed road network including the A421 which heads west towards Milton Keynes and the M1. The Black Cat Roundabout leads onto the A1 and the soon to be upgraded A428 which will improve connections between Oxford and Cambridge. In addition, improvements are proposed for the new Oxford to Cambridge railway line (the East-West Rail (EWR)) which will have stations at St Neots / Sandy and Wixams, both of which will be accessible from this site. The site is therefore considered to be well located to the Arc growth corridor and would enable much needed commercial space in the heart of this growth area.
- 1.8 This submission covers circa 22.26 hectares of land. In terms of the indicative quantum of development, this site is considered suitable for approximately 74,000m² of commercial space and additional supporting infrastructure, possibly including the relocated services to the north-east of the Black Cat, which will be displaced following the Black Cat to Caxton Gibbet road improvement scheme. The amount of commercial space is based on the assumption that approximately 40% of the site will be occupied by built form with the remaining area for landscaping, service roads, loading bays and car parks etc.
- 1.9 Our clients are keen to promote the land and there has been significant developer interest. A collaboration agreement has been agreed with the landowners and this has been separately submitted to the Council. It demonstrates that all landowners are committed to promoting this land for development.

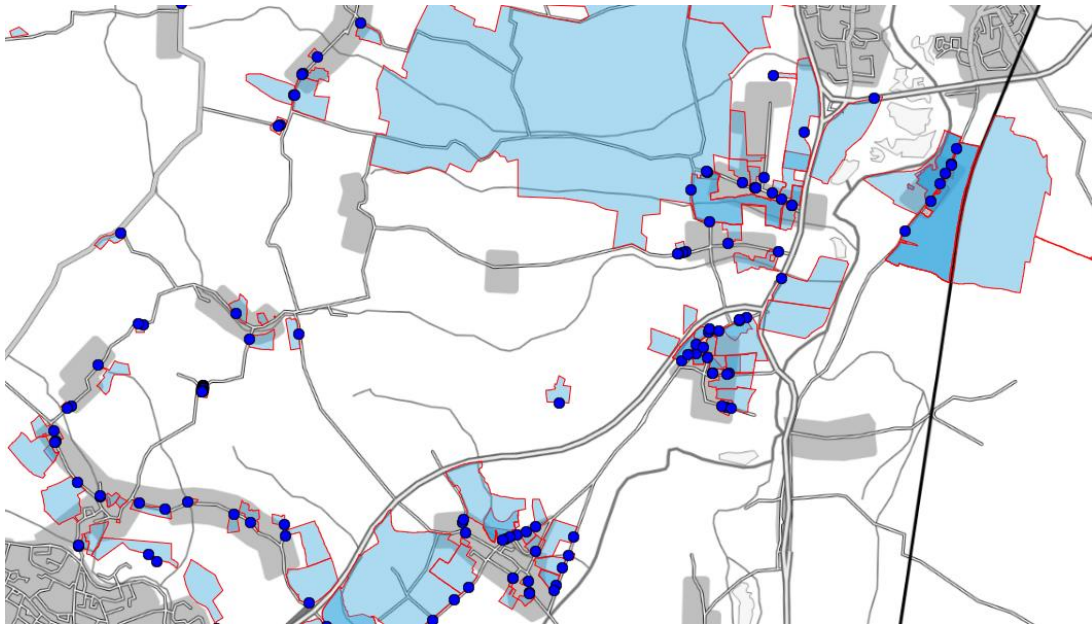
2.0 Level of Growth Required

- 2.1 Chapter 3 of the consultation document identifies that given the predicted population growth up to 2040, 171 hectares of new employment land will be required. The current supply of employment land in the District sits at 48 hectares with this meaning that 123 hectares of land needs to be allocated within the Local Plan. The Local Plan should proactively seek to provide a buffer in the level of employment land to be required in order to allow a choice in the market and a differential in suitable sites to allow for the different requirements by the market. In this regard, although Chapter 3 stipulates that there is currently a shortfall of 123 hectares of land, the Council should look to allocate additional land to provide this buffer and to meet the wider requirements of different industries. For example, a buffer of 10% should be applied and therefore the plan should be looking to allocate 135 hectares of employment land to allow for this flexibility.
- 2.3 As a centrally located local authority in the Oxford to Cambridge Arc, Bedford Borough should ensure that the level of growth that is to be planned in the authority should be in line with wider aspirations for the area, with the employment areas additionally fulfilling the requirements set out in the Arc Vision. It is important that the employment areas that are proposed within the chosen strategy must be in close proximity to the strategic road network to allow easy access to the research and development hubs that have been constructed in both Oxford and Cambridge.
- 2.4 The amount of employment land that is to be allocated is affected in part by the following factors: the aspirations of the Oxford-Cambridge Arc should be considered alongside the requirements to provide different types of employment uses including B1 and B8 land uses and cross-boundary growth. These factors reflect the need to further increase the level of employment land to be allocated.
- 2.5 The inclusion of sites that are close to the boundary with the neighbouring authorities would additionally lead to the residents of these authorities coming into Bedford Borough thus boosting the economic growth of the Local Authority, without increasing the demand for residential dwellings in the authority.
- 2.6 Therefore, the employment requirement in the Local Plan 2040 needs to plan for flexibility and the broader long-term economic aspirations for growth in the area.

3.0 Growth and Spatial Strategy Options

3.1 It is noted that The Development Strategy Topic Paper states that at the Issues and Options stage, the most popular options for commenters were the urban area, the A421 corridor and rail-based locations. Further, the Sustainability Appraisal process identified that urban growth and urban edge growth are the most sustainable approach to new development.

3.2 The Call for Sites Extract shows a snippet of the sites that have been submitted for consideration by the Local Authority as potential development sites. A substantial number of these have been submitted for consideration as residential housing schemes as opposed to employment land. As flagged in Chapter 3 of the consultation document, the Council wishes to utilise both larger and smaller sites for use as employment sites, thus meaning a substantial number of sites would need to be allocated to meet the identified demands of employment land in the Borough.



Call for Sites Map Extract

3.3 Of the sites that have been promoted thus far, it cannot be assumed that all the sites will be suitable and there may be constraints that limit what can be delivered, such as neighbouring uses, access, ecological considerations etc. This, therefore, makes it all the more essential that the Council give proper consideration to all the sites that have been put forward for development.

3.4 In a similar vein to the above, finding suitable sites for up to 51 hectares of employment (outlined in all options) on the edge of Bedford will be a challenge. Development on the edge of Bedford is realistically limited to the north/north-east of the town due to landscape, topography, flood plain constraints as well as the close proximity of the boundary of Bedford town to smaller settlements. Much of this land, whilst potentially suitable for residential development, aside from discrete parcels, is unlikely to be suitable for employment use.

3.5 Option 2d includes development in the eastern area of the A421 travel corridor which is supported by the clients as this provides a more flexible approach to development alongside not limiting this to a certain area of the Borough. It is, however, a concern that a number of the

approaches are only limited to the south-western area of the District thus not utilising the important roles of the strategic transport links elsewhere and their associated roles, particularly for employment uses which rely on access to the strategic highway network. The close proximity of this site to the A421 and the A1 should be recognised within the site analysis that is to be undertaken, thus meaning that the site should be in a strong position for allocation.

- 3.6 In our view, for employment uses, given the relationship with the A1, the strategy outlined in Option 2d should be taken forward for further detailed consideration. It is important that there is a distinction made in the development of the strategy between the needs for employment uses and residential requirements. Whilst there is land with potential in the wider A421 corridor with the potential to accommodate both uses, from an employment perspective, the link to both the A421 and A1 sets option 2d apart.
- 3.7 We consider that a finer grain assessment of site availability and suitability should be undertaken to inform the development strategy. It is considered that this will identify a greater level of potential for growth along the whole of the A421 corridor. The whole of the A421 corridor should be looked at as one moving forward, with no arbitrary distinction between the eastern and southern parishes. This will allow a proper review of employment locations on a comparable basis and avoid suitable sites being missed out because they did not fall within the favoured growth area.
- 3.8 It can be noted, that the A421 has seen considerable growth in employment floorspace over recent years given its locality in both the Oxford to Cambridge Arc and the M1 corridor. In the future, it is predicted that this demand will remain, particularly for logistics given the ever-increasing emphasis on online sales alongside the significant investment in the A428 improvements.
- 3.9 The road improvements to the A428 / Black Cat roundabout and the East-West Rail are the key infrastructure investments in the area over the plan period and it is important that the opportunities associated with this significant investment are maximised. They will provide important connections between Oxford and Cambridge as well as linking to the wider train network. The village of Roxton is ideally located to maximise these opportunities and attract significant investment to the Borough.
- 3.10 This land is ideally located at the important interchange between the A428, A421 and the M1. In addition, it will be in close proximity to the East-West Rail. It is therefore considered that this site is ideally located for proposed employment land. This additionally supports the assertion in Paragraph 6.7 of the consultation document that outlines that sites should be well connected.
- 3.11 The proposed development at Roxton would not prohibit or curtail any of the planned infrastructure coming forward.
- 3.12 The inclusion of a new settlement in the strategy would present the opportunity to deliver new employment sites. However, there is a significant lead time associated with the development of new settlements, which would mean the release of employment land much later in the plan period with this potentially leading to a shortfall in the development of these employment areas in the short and medium-term stunting the growth of the Boroughs economy. This issue would be exacerbated should two new settlements be proposed within the plan.

- 3.13 If a new settlement is to be included in the strategy, the amount of employment land that they would deliver in the plan period should be realistic and sufficient, with other employment land also identified to meet immediate and medium-term demands. It is noted that the options currently assume the completion of either settlement option within the plan period. We would suggest that this is not a realistic assumption given the stage the plan is at and the lead-in time on matters such as land assembly, planning and infrastructure delivery.

4.0 Site Assessments

- 4.1 The approach taken by the Council when making general conclusions and assessing the suitability of sites for development as part of the Site Assessment process has been unsatisfactory to date.
- 4.2 The site assessment forms have not been underpinned by a detailed review of the evidence available to the Council. There is a housing scheme directly to the south of the site (LPA Ref. 21/00014/MAO) for 50 dwellings that assess the local area, and the knowledge obtained through this application should be transferred to this site. This application drew the following primary conclusions:
- In terms of heritage it was agreed that the site did not make a contribution to the significance of any listed building other than the Church.
 - Ecologically, the site was considered to be of a low habitat value, although mitigation is proposed to protect protected species in construction.
- 4.3 The site assessment forms also fail to provide any detailed assessments or conclusions on key topics. For example, when looking at the site assessment form:
- At 4a, the form states that *'the proposal has the potential to cause harm to heritage assets...'* and then goes on to speculate that this harm could be of any form of significance and that mitigation may or may not be required. It is apparent from the information presented that very little consideration has been given to the heritage impact that developing the site would have and as a result, the Council could misrepresent a site that is acceptable from a heritage perspective or suitable mitigation could be implemented.
 - At 5a, it is outlined that *"Nothing chosen"* in relation to whether the development would be likely to increase future economic and employment opportunities. As this site is endorsed as an employment site it is noted that these opportunities would occur.
 - At 9a, it is stated that the *"site is not previously developed land as defined in the NPPF"*. It is noted that the part of the site is a garden centre, thus meaning it should be acknowledged that a part of the site is previously developed.
 - 15f and the highways comments together note that there may be potential capacity problems that require mitigation and then go on to suggest a potential means of mitigation. However, there is no real professional assessment as to the likelihood that this mitigation can be successfully achieved, and this, therefore, leaves a question mark in relation to the site deliverability.
- 4.4 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.
- 4.5 The site assessment form does not allow for a consideration of the potential benefits that sites may offer, including the proposed use of the site for employment with the potential relocation of the service station also part of the offering. No real consideration of this is given in the site assessment section of the forms.

- 4.6 The assessment process for sites should be thorough and draw information from an existing evidence base held by the Council. There should be a greater degree of transparency in the site assessment and selection process, and it is noted that plans in other local authorities have been brought down in recent years for failure to do this on the basis that it undermined the conclusions made.

5.0 Summary and Conclusions

- 5.1 This representation has detailed a number of comments and concerns that the landowners have with the Draft Strategy Options.
- 5.2 The landowners have concerns on Options 2a – 2c due to the reliance on the southern and rail transport corridors, with limited evidence to support this. The assumed capacity of the urban area and the rail focused fringes to deliver the amount of required employment land should be reviewed in more detail. Development should be spread along the A421 corridor including in the ‘eastern’ parishes, where the relationship to both the A421 and the A1 makes land particularly suitable for employment purposes.
- 5.3 A focus for growth within the A421 corridor is supported by the landowners and it is asserted that there is a need to increase the level of development focused along the A421 corridor in each of the options due to the constraints which affect other options.
- 5.4 The site assessment process should thoroughly assess the suitability of all sites within the A421 corridor, reaching conclusions drawn upon all available evidence.
- 5.5 In carrying out the assessment the influence of the A1 on the suitability of land for employment purposes should be paramount. When the suitability of the site at Roxton for development is considered alongside its strategically advantageous position, we considered that it should form a key part of the revised development strategy in the Local Plan 2040.