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For and on behalf of
Bedfordia Developments Ltd

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

Land at Rushden Road, Milton Ernest– LPA Ref: 852

**Prepared by
DLP Planning Ltd
Bedford**

September 2021



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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 **Bedfordia Developments Ltd (Bedfordia)** in response to the 'Bedford Local Plan 2040 – Draft Plan Strategy Options and Draft Policies (Regulation 18) Consultation'.
- 1.2 This representation relates to Land at Rushden Road, Milton Ernest. The site, as submitted, extends to 1.4ha and is located immediately adjacent the northern edge of the built settlement. The site comprises an active and successful existing employment use, assessed as such and identified for protection as part of the Council's Part 2 Employment Land Topic Paper (Site BE20). The Council's assessment relates only to a smaller portion of the site (0.63ha) occupied by an existing industrial unit and office facility comprising for vehicle repairs and fleet logistics. Demand for uses at the site has and continues to intensify, with the Council's own assessment noting - having regard to temporary extensions to workspace and vehicle parking – *"the site may not be large enough to fully accommodate the uses, or may require further built development to accommodate this."*
- 1.3 These representations seek to ensure that the emerging Local Plan 2040 supports the sustainable growth of the site in to maintain and increase opportunities for economic development in this location. This can be achieved through an extension in the area proposed for designation/allocation and policies to support the future expansion of floorspace at the site, in accordance with the Strategy's settlement hierarchy and objectives for jobs growth.
- 1.4 DLP, on behalf of Bedfordia, 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.
- 1.5 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 Bedfordia 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 on the urban areas of Bedford and Kempston and the parallel restraint of development in rural areas. This as we have detailed elsewhere has failed to recognise the

potential and capacity of rural settlements and their need for growth, and a corresponding reduction in rural service provision and the consequences of that.

- 1.7 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 1.11 and Paragraphs 3.1 – 3.3 (Local Housing Need and Levels of Growth)– Comment

2.2 Paragraph 61 of the NPPF2021 confirms that minimum annual local housing need calculated in accordance with the government's Standard Method provides the starting point for assessment of the number of homes to be provided through plan-making. Positive plan-making should address those circumstances where it may be appropriate to make provision for a higher number of new homes than indicated by the result of the Standard Method (with a non-exhaustive list of potential reasons summarised in the Planning Practice Guidance at ID: 2a-010-20201216).

2.3 It is apparent from paragraphs 1.11 and 3.1 to 3.3 of the Council's consultation proposals that the Council has not considered potential reasons to plan for a higher housing number as part of the current process. Instead, it has only tested an arbitrary 10% uplift to the calculation of LHN within the draft Sustainability Appraisal process. This approach is contrary to material considerations (including the Council's own evidence base) that require more detailed assessment before selecting options for the submission draft Plan and setting the housing requirement in the Plan.

Reasoning

2.4 Paragraph 3.4 of the consultation document 'Creating a Vision for the Oxford-Cambridge Arc' refers to the importance of the role of the NPPF to deliver the economic pillar of objectives for the corridor. In principle this reflects use of the Standard Method as the expected starting point to identify housing needs within the Arc but further reflects observations in the initial consultation and the role of the PPG that may necessitate delivery of higher levels of housing, setting out considerations such as:

- *“developing an Economic Strategy, supported by strong economic evidence, to identify the policies, locations and investment needed to deliver the Arc's potential for sustainable and green economic growth; and*

- *setting policies to make sure growth is felt by all communities and the Arc becomes a better place to live and work for all, such as by providing more housing in the right places, making sure people can move around by public transport and other infrastructure, and enhancing the Arc's natural capital"*

2.5 The main implication of this component of the Arc Spatial Framework reflects circumstances where the calculation of local housing need will not result in sufficient workers in the right locations to achieve the full potential of sustainable patterns of economic development.

2.6 In relation to the Council's evidence base there appear to be significant issues with their assumptions for labour demand and labour supply techniques to forecast future changes in jobs and the requirement for additional workers.

2.7 In-particular, the Council's Employment Topic Paper:

- Does not use a range of economic forecasts (utilising only the East of England Forecasting Model (EEFM2019) baseline scenario only)
- Does not consider a past take-up scenario for jobs growth and delivery of employment floorspace
- It is likely to significantly over-estimate the number of jobs associated with the increased working-age population based on the LHN (the Council's employment land scenarios set out no assumptions on economic activity rates or commuting - the baseline EEFM assumptions are not dissimilar to LHN in terms of additional dwellings and persons required to meet the jobs forecast).
- It takes no account of engagement with the LEP or forecast Spatial Framework scenarios (that may result in a higher demand for labour)

Remedy

2.8 Failure to take account of these factors means that the Local Plan 2040 is more likely to result in conflict with the emerging priorities of the Arc Spatial Framework and it is recommended that a range of jobs-led scenarios are tested prior to determining the housing requirement for the Local Plan 2040 and selecting an appropriate strategy.

Paragraph 3.8 (Level of Employment Growth) – Comment

2.9 The Council's conclusions in the Employment Land Topic Paper to take account of the limited opportunities for high density office development and the majority of demand from within lower density business parks are generally supported.

2.10 It is recognised that the Council's requirement for a minimum additional allocation of 123ha

employment land represents an ambitious target and takes account of relatively limited existing supply. However, the approach to identify the overall land required cannot be considered sound without undertaking more detailed analysis of the potential jobs growth and floorspace needs associated with testing a wider range of jobs forecasts.

Paragraphs 3.15 – 3.17 (Spatial Strategy Options) – Object

- 2.11 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.
- 2.12 In terms of meeting the needs for economic development the Council's Preferred Options cannot be considered **justified, effective, or positively prepared**. This is principally due to an overreliance on the allocation and delivery of large-scale business parks (as summarised at paragraph 6.8 of the Consultation Document. Even allowing for up to three large business parks the Council acknowledges: ***“the remaining 63 ha should be allocated in smaller sites which are more likely to be attractive for office and general industry purposes.”***
- 2.13 The Council's Preferred Options are not sufficiently flexible to provide for the range and type of sites required, part of which could be met by our client's land at Rushden Road, Milton Ernest through the expansion of an existing employment use. Specifically, the Council is reliant on the delivery of New Settlements and rail-based growth where the availability of land for economic development is uncertain and would have long lead-in timeframes. Particularly for proposed components of growth at Stewartby and Kempston Hardwick the Council is reliant upon land currently being promoted for employment use being brought forward for housing instead. This level of uncertainty is not the basis for sound plan-making or providing support for the Plan's priorities regarding economic development.
- 2.14 The Council's draft Sustainability Appraisal findings recognise this, where **Option 3c** (including village-related growth) achieves the same assessment of **Positive** effects for SA Objective 5 (economic development) as the Council's Preferred Options. This is a function of the diverse range of local employment opportunities in existing Rural Service Centres (14ha – which it must be assumed includes existing provision at Milton Ernest) providing opportunities for the creation of balanced communities.

- 2.15 In the case of Milton Ernest, concerns with the assessment findings relating to strategic road access and the potential for clustering are overcome due to proximity to the A6 and existing employment activity within the site.
- 2.16 Support for additional opportunities for economic development at sustainable locations in the hierarchy is thus consistent with the Plan's overall objectives and essential to achieve a sound strategy. The Council should thus adopt a 'hybrid' approach to strategy options for both economic and residential development to overcome the soundness concerns identified.

Policy E1S (Amount and Distribution of Employment Development) – Comment

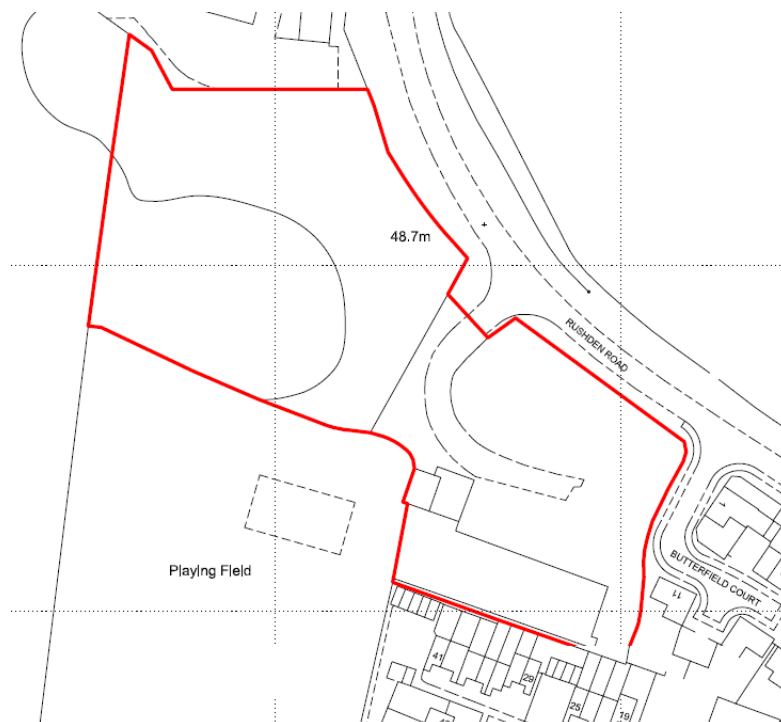
- 2.1 The policy sets out the requirement for a minimum of 8,642 net additional jobs will be provided to 2040. Principally we support Policy E1S and meeting the requirement for additional allocations to meet needs for economic development over the extended plan period. Support for the approach is provided notwithstanding our wider objection to the Council's position regarding forecasting demand for jobs growth (potentially failing to ensure a sustainable balance between jobs and homes) and its Preferred Options published for consultation (too inflexible).
- 2.2 However, in order to be considered sound proposed policy criteria (i) also requires modification. This is in order to reflect that the development strategy includes providing support for economic development in Key Service Centres and Rural Service Centres. This is necessary in terms of maintaining sustainable patterns of development and the ability to respond flexibly to changing patterns of demand.
- 2.3 Our client's site at Rushden Road, Milton Ernest, would satisfy this requirement and would satisfy other appropriately worded policy parameters on all technical matters (including access, ecology, and landscape). these parameters would be satisfied. Criteria (i) should be modified to reflect that the Development Strategy supports the expansion and intensification of existing sites.
- 2.4 Additionally, and should our client's land not be allocated or specifically designated within the Policies Map, criteria (ii) should be modified to specify that the circumstances where providing support for development on unallocated sites include the expansion and intensification of existing safeguarded employment uses within suitably located adjacent sites.

3.0 RESPONSE TO SITE ASSESSMENT PRO-FORMA (CALL FOR SITES ID 852)

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 at Rushden Road, Milton Ernest



- 3.2 The site, as submitted, extends to 1.4ha and is located immediately adjacent the northern edge of the built settlement.
- 3.3 The site comprises an active and successful existing employment use, assessed as such and identified for protection as part of the Council's Part 2 Employment Land Topic Paper (Site BE20).
- 3.4 The Council's assessment relates only to a smaller portion of the site (0.63ha) occupied by an existing industrial unit and office facility comprising for vehicle repairs and fleet logistics. Demand for uses at the site has and continues to intensify, with the Council's own assessment noting - having regard to temporary extensions to workspace and vehicle parking – *“the site may not be large enough to fully accommodate the uses, or may require*

further built development to accommodate this.”

- 3.5 These representations seek to ensure that the emerging Local Plan 2040 supports the sustainable growth of the site in to maintain and increase opportunities for economic development in this location. This can be achieved through an extension in the area proposed for designation/allocation and policies to support the future expansion of floorspace at the site, in accordance with the Strategy’s settlement hierarchy and objectives for jobs growth.
- 3.6 The site is suitable served by an existing access from the A6 (Rushden Road). The site has no known environmental, ecological, or archaeological constraints that would inhibit development.

Response to Borough Council’s Site Assessment Pro-Forma (Site ID: 852)

Site Assessment Criteria

- 3.7 We have reviewed the Council’s assessment of the site and wish to make a number of comments below.

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

- 3.8 The site adjoins the urban area or a settlement policy area (SPA), it therefore should be considered for development and predominantly comprises previously developed land in existing employment uses (or temporary uses associated with these). The land is well-related to the existing settlement and its expansion would be contained by the presence of further commercial floorspace lying to the north (at Protech Stainless Steel) beyond the existing settlement boundary. Designation of the full site area submitted in respect of our client’s interests is therefore appropriate and would proportionate to the scale of the settlement and would not extend beyond existing development.

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

- 3.9 The Call for Site assessment found that the proposal has the potential to cause harm to heritage assets, which may range from low to high. This is a standard response that the Council has applied to a large number of the assessment pro-forma.
- 3.10 In this case our client’s land at Rushden Road there are no designated heritage assets within

or in close proximity to the site.

- 3.11 There will be options to avoid, reduce or mitigate this harm and where sites have not been ruled out altogether for other reasons. In the case of our client's land further assessment will be undertaken to more fully explore impacts on significance (including the contribution made by the setting of any affected assets) and to ensure that any impact would represent less than substantial harm in terms of Paragraph 202 of the NPPF, which is the expected outcome given the context described above.

Impact on Highways

- 3.12 No access or capacity issues are identified, reflective of the site's location and existing use. The findings of the site assessment proforma are endorsed, including the potential to extend pedestrian footway connections, if required.

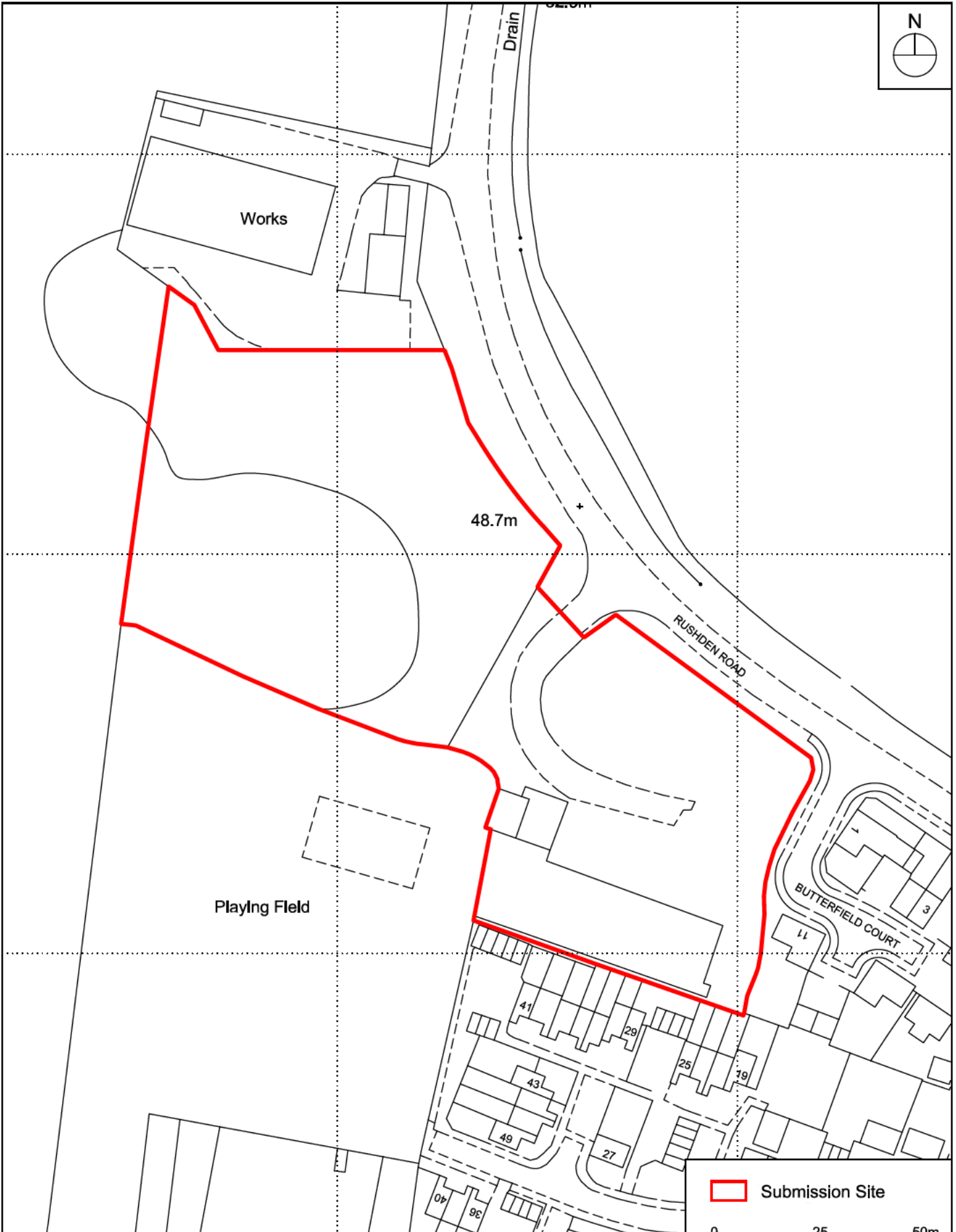
Protected Species and Ecological Value

- 3.13 The Council's assessment records a potential uncertain impact but recognises that the land is not within or adjacent areas of nature conservation importance. The proforma does not reflect that the majority of the site area comprises previously developed land.
- 3.14 As part of future development of the site it would be appropriate to seek preparation of an Ecological Impact Assessment comprising a Phase 1 Habitat Survey and assessment of potential site features supporting the presence of protected species.
- 3.15 This would be an appropriate basis assess the impact of the development proposal and set out mitigation measures required to ensure there is no net harm to ecological features and where possible identify any opportunities available for integrating ecological features within the development. It is anticipated that a number of ecological enhancements could be provided as part of proposals, such as habitat piles, hedgehog tunnels, bat boxes, bird boxes and native planting and that delivery of these enhancements would lead to an overall Neutral to Minor Beneficial impact




BE5005-1P Land at Rushden Road, Milton Ernest
Bedfordia Developments Ltd
Representations to Bedford LP2040
September 2021

Appendix 1 Site Plan (Land at Rushden Road, Milton Ernest ID: 852)



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PROJECT Bedford Local Plan	DRAWING TITLE Location Plan				



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