

# Bedford Borough Local Plan 2040

## Response by AWG to Strategy Options and Draft Policies Consultation

August 2021



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# 1.0 Introduction

- 1.1 These representations have been prepared on behalf of Arnold White Group ('AWG') in response to the public consultation on Bedford Borough Council's ('BBC') Local Plan 2040 – Draft Plan, Strategy Options and Draft Policies Consultation ('the Local Plan').
- 1.2 AWG are a landowner and strategic land promoter, owning and controlling significant areas of land within Bedford Borough. These representations are made having particular regard to an area of land, known as West Park Farm, located immediately south of Wilstead. A Site Location Plan identifying the extent of land (hereafter referred to as 'the Site') is enclosed at Appendix 1.
- 1.3 The Site has previously been submitted to BBC as part of the Call for Sites process, and representations were submitted to the Local Plan 2030 on behalf of the landowner.
- 1.4 The response to this consultation considers the key issues of housing and job growth; strategic locations for growth; climate change; and, as an overall point, the relationship of the Local Plan to the Oxford - Cambridge Arc Spatial Framework and the role Bedford Borough plays within the Arc.
- 1.5 This response also includes further information in relation to the land at West Park Farm, with the enclosed illustrative Masterplan (Appendix 2) demonstrating how the land can deliver a net zero carbon development in a sustainable location, which would help to both meet local housing needs and deliver the aims of the Local Plan in accordance with the outlined growth strategies.
- 1.6 The Local Plan evidence base finds that the land at West Park Farm is a logical and appropriate location for development; indeed the LCA actively points to this location for future growth. The Site would accord with the emerging development strategy for BBC and would deliver housing in a sustainable location, together with renewable energy, as advocated in the NPPF, creating an exemplar development for the Local Plan to allocate.

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## 2.0 Approach to Growth

### Housing Needs

- 2.1 Paragraph 15 of the NPPF (2021) requires Local Plans to, inter alia, provide a framework for addressing housing needs and other economic, social, and environmental priorities.
- 2.2 Paragraph 16 states that Local Plans should be prepared with the objective of contributing to sustainable development and be prepared positively in a manner that is aspirational as well as deliverable.
- 2.3 The NPPF also requires (para 23) that the Strategic Policies of the Plan should provide a clear strategy for bringing land forward to meet objectively assessed needs in line with the presumption in favour of sustainable development (para 11), and, in doing so, allocating sufficient sites to deliver the strategic priorities of the area.
- 2.4 National Policy therefore provides a clear, positive context with a clear requirement to meet identified needs in an aspirational but deliverable fashion. Importantly, the **NPPF does not state that Plans should adopt a ‘do minimum’ approach; instead it promotes ambitious growth**, where it is carried out in a sustainable fashion.
- 2.5 Bedford Borough sits in a key location within a national area of strategic importance, being at the heart of the Oxford-Cambridge Arc (‘the Arc’). Whilst the timetable for the Local Plan does not align with that of the Arc Spatial Framework, our client supports the approach being taken by BBC of progressing the Local Plan in advance of the Arc Spatial Framework and consider it is crucial that the Plan is adopted in a timely fashion.
- 2.6 The Local Plan 2030 was adopted on the basis of an early review and was examined against the 2012 NPPF under transitional arrangements. The Local Plan 2030, therefore, whilst being relatively “young” in Local Plan terms, is quite outdated in terms of its approach to housing needs. The level of growth identified and allocated in the Local Plan was based upon historic methods for identifying housing need, and, therefore, suppresses housing need for a recently adopted Plan.
- 2.7 The Local Plan 2040 must, therefore, address this issue in addition to considering housing needs associated with the Arc.
- 2.8 The Local Plan 2030 was found sound on the basis of an average housing need of 970 dwellings per annum (‘dpa’) across the period of 2015-2030.
- 2.9 The Standard Method requirement (para 3.2 of the Local Plan) meanwhile, finds an average housing need of 1,275dpa, which the Local Plan applies across the plan period of 2020 to 2040. There is, therefore, an overlap of some 10 years between the two.
- 2.10 The Local Plan 2030 did not, therefore, meet the housing needs as now identified based on the Standard Method. The Inspector’s Report into the 2030 Local Plan recognised (IR para 40) that if the Standard Method had been applied in that instance, then the housing need figure of 1,280dpa would have applied.

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- 2.11 The Standard Method has a cap which applies in instances where the strategic policies for housing in a Local Plan have been adopted within the last 5 years<sup>1</sup>. Whilst that is strictly correct in the case of BBC, as identified earlier in this Statement, the spatial policies in the Local Plan 2030 effectively suppressed housing needs due to their consideration under the transitional arrangements.
- 2.12 There is a potential suppressed need for the period 2015–2020 of some 1,550 homes (1280–970 = 310 x 5 years). It is contended, therefore, that the cap should not apply in this instance as the spatial policies for housing need are effectively out of date.
- 2.13 The Planning Practice Guidance is clear<sup>2</sup> that the Standard Method identifies a **minimum** annual housing need figure. **It is not, therefore, a maximum target** and it is wholly appropriate to apply a higher housing need figure.
- 2.14 In this instance, whilst the housing targets for the Arc are currently unknown, given the Plan runs until 2040, **it would also be appropriate to include an uplift to allow for additional housing to contribute to the Arc** within the period.
- 2.15 **The current strategy of deferring such a decision until the next review is not a sound approach**; it is not positively prepared planning for a spatial strategy that will cover some 20 years. Even with a review in 5 years' time (as is suggested in the Local Plan), that would be close to the midpoint of the Local Plan on the basis that this Local Plan is not likely to be adopted until 2024 (if submission is in 2023). Moreover, the requirement is only that a Local Plan Review is commenced in 5 years' time, not completed, **so any future review would not be completed until after 2030.**
- 2.16 This approach contrasts the approach taken by other authorities within the Arc, including Oxfordshire who are currently consulting on a new Local Plan (Oxfordshire Plan 2050) which specifically sets out that part of its purpose is to influence and shape the emerging Arc Framework. Failure to positively plan for the Arc now would reduce the Borough's ability to influence the direction and vision for the Arc through the Borough.
- 2.17 It is evident, therefore, that an uplift allowance in housing needs should be included in this Local Plan to begin to accommodate future growth resulting from the Arc. Given historic market trends and the scale of housing, an uplift of 10% (as a minimum) from the Standard Housing Method figure of 1,275dpa would be reasonable at this time. This would lead to a new housing need of 1,403dpa (rounded). That equates to a total need of 28,050 homes across the period 2020–2040.
- 2.18 In summary, therefore, **the housing need figure in the Local Plan should be increased** to reflect the suppressed supply in the Local Plan 2030, and future growth from the Arc. A minimum increase of 10% should be applied, equating to a minimum need of 28,050 homes.

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<sup>1</sup> Planning Practice Guidance reference ID2a-007-20190220

<sup>2</sup> Planning Practice Guidance reference ID2a-002-20190220

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## Plan Period

- 2.19 Turning to the matter of Plan length AWG contend that the Plan Period should run to 2050. A period to 2040 is only 10 years beyond the existing Local Plan and is not a sufficiently long enough extension to effect real change.
- 2.20 As the Council will be aware, strategic growth and development, along with wide scale change, takes many years to deliver. Sites take a long time to plan correctly and then commence delivery, and thus a longer Plan Period should be allowed for.
- 2.21 Furthermore, by extending to 2050, this would bring the Plan in line with others in the Arc, such as the MK2050 Vision and the Oxford 2050 Plan. Given the strategic and important role that Bedford Borough plays within the Arc, **it would represent 'good planning' and a holistic approach to align the Local Plan Period with those other areas.** The next review of the Local Plan would then not need to extend the Plan Period, but instead revise housing and employment growth to reflect the latest position as relevant at that time.

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## 3.0 Climate Change

- 3.1 The first statement contained within the Local Plan's Vision (Chapter 2) rightly sets an **aim of tackling climate change and adapting to and mitigating its effects being at the heart of new development** in the Borough.
- 3.2 This is then reinforced, with Theme 1 (p.13) setting an objective to making Bedford Borough a carbon neutral Borough. The draft Local Plan, however, does not currently carry this commitment through in such a way as to suggest meaningful action.
- 3.3 Firstly, **the Local Plan does not include any proposed strategy or approach concerning renewable energy development**. If the Borough is serious about becoming carbon neutral and tackling climate change, **it is essential that the Local Plan includes positive policies which encourage both renewable energy developments, and net zero carbon developments**, to come forward.
- 3.4 The NPPF is clear (Chapter 14 – para 152 in particular) that the planning system should, inter alia, support renewable and low carbon energy and associated infrastructure. Para 153 states that Plans should take a proactive approach to mitigating and adapting to climate change.
- 3.5 Moreover, para 155 states that Plans should both provide a positive strategy for energy from renewable and low carbon sources and consider identifying suitable areas for such developments.
- 3.6 The Local Plan fails to tackle this issue. As currently drafted, it lacks any meaningful proposals or aims in order to meet these requirements of national policy.
- 3.7 In the same fashion that the Local Plan has considered issues and options around future growth (scale, location, pattern etc), this iteration of the Local Plan should have also included options proposing a positive strategy for energy from renewable and low carbon sources, including potential locations.
- 3.8 It must **encourage growth that comes forward where renewable energy goes hand in hand with development proposals, with positive policies encouraging such developments** (be they as allocations and/or applications) to be considered favourably. The NPPF makes particular reference (para 155 c) to identifying opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply, and for co-locating heat customers and suppliers.
- 3.9 Of particular concern is the lack of any focused evidence base document(s) addressing these matters. The list of Local Plan 2040 Supporting documents provided by the Council is absent any topic papers, studies or the like which address these matters.
- 3.10 It is essential that BBC undertake such work as a matter of urgency to inform the next stage of the Local Plan. **AWG propose that the Local Plan will need to include policies allocating sites for renewable energy, as well as allocating strategic developments which could come forward alongside renewable energy**. The land West Park Farm, as set out later in these representations, is a

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proposed development that would be in accordance with such an approach as advocated by the NPPF.

- 3.11 The Sustainability Appraisal ('the SA') should also be updated to reflect this requirement. **The climate crisis is a significant, national issue and the SA methodology must be amended to provide greater weighting to matters relating to climate change and energy.**

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## 4.0 Development Strategy

- 4.1 The previous Issues and Options consultation outlined six potential approaches to growth as follows: urban based; A421 based growth; rail growth; East West Rail northern station growth; dispersed growth; and new settlement based growth.
- 4.2 These six options have now been progressed and as set out in the Local Plan and Development Strategy Topic Paper (June 2021); BBC now seek views on four ‘preferred options’ to meet the (proposed) level of growth set out in the Local Plan.
- 4.3 The options put forward in the Local Plan are as follows:
1. Option 2a: Development in and around the urban area, plus A421 transport corridor with rail-based growth parishes and southern parishes;
  2. Option 2b: Development in and around the urban area, plus A421 transport corridor with rail-based growth parishes and southern parishes, plus one new settlement;
  3. Option 2c: Development in and around the urban area, plus A421 transport corridor with rail-based growth parishes, plus two new settlements;
  4. Option 2d: Development in and around the urban area, plus A421 transport corridor with rail-based growth parishes, southern parishes, and eastern parishes, plus one new settlement;
- 4.4 The four options put forward share many common components. In all but one option (Option 2c), growth is proposed to the south of Bedford, including the southern parishes. The only option that omits this approach is Option 2c, which instead proposes the delivery of two new settlements.
- 4.5 Firstly, **Option 2c is not considered a sound approach**. As has been evidenced<sup>3</sup>, the development of large sites (2,000+ dwellings) takes many years. The average time quoted from validation of the first planning application to the first dwelling being completed on schemes of 2000+ dwellings is 8.4 years. The lead in period to starting on site for new settlements is many years, being further complicated by matters such as creating the necessary utility infrastructure for a new settlement.
- 4.6 The same report also finds that the average annual build-out rate for a scheme of 2000+ dwellings is 160dpa.
- 4.7 Working on the basis of a plan led system, any application for a new settlement would, in theory, not be validated until after the Local Plan is adopted, thus 2024 at the earliest. This means that **any new settlement is unlikely to begin delivering homes until 2032 at the earliest**. The proposed new settlements are 3,085 dwellings at Little Barford, and 2,500 dwellings at Wyboston. Little Barford would take 19.3 years to build out at that rate (almost the entire Plan duration), and Little Barford 15.6 years.

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<sup>3</sup> Start to Finish, Second Edition, Lichfields February 2020

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- 4.8 If the Plan period runs until 2040, **both new settlements would only deliver, at best, half of their housing numbers within the Plan Period.**
- 4.9 **The approach set out in Option 2c would not, therefore, meet the Borough's housing needs within the Plan Period** and should be discounted as a result.
- 4.10 The criticisms of Option 2c would apply, to a lesser extent, to Options 2b and 2d, albeit the effect of only having one new settlement would lessen the delivery issues.
- 4.11 **The option which has the greatest likelihood of delivering growth within the Plan period, as required by national policy, is Option 2a.** This option would focus growth in the south along the major transport corridors of the A421, A6 and railway line, and in turn would focus development in the most sustainable locations.
- 4.12 **The Development Strategy Topic Paper finds (para 3.19) that Option 2a is the best performing option.** It also finds Option 2c to be the worst performing of these 4 options, and that is without considering the issue of delivery as set out above.
- 4.13 AWG strongly argue that Option 2a should be the preferred Option for growth that is taken forward in the Local Plan. Option 2a is the best performing of the various growth options as shown by the evidence base.
- 4.14 The next section of these representations puts forward a case as to one such location for growth within the southern parishes, which would deliver growth in accordance with Option 2a (in fact according with 3 of the 4 development options).

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## 5.0 Land at West Park Farm

- 5.1 The land at West Park Farm sits immediately south of Wilstead, as shown on the Site Location Plan enclosed at Appendix 1. The land measures c.21ha and was submitted to BBC through the Call for Sites process in 2020. Enclosed at Appendix 3 is the Council's assessment of the site contained in the Site Assessment Pro Formas (June 2021).
- 5.2 The land has previously been put forward for a residential development, with the Council's assessment suggesting 525 homes. Since the previous submission, AWG has prepared a more detailed land use assessment of the site and the enclosed illustrative masterplan (Appendix 2) demonstrates **how the site could provide the following net zero carbon development<sup>4</sup>**:
- 13.6 hectares of residential (511 dwellings at around 37.5 dph - 1.9 hectares is shown as 'multi-generational housing')
  - 5.5 hectares of solar, a large scale (potentially 6MW) wind turbine and ground sourced heating infrastructure to supply homes with hot water
  - 1 hectare school site (single form entry)
  - 2 hectares playing fields
  - 3.3 hectares of woodland in addition to woodland buffer planting
  - Allotments
  - Community Hub
  - Retail/café with EV charging
  - A new roundabout on the A6 at the Chapel End Road junction
  - A new cycle/footpath connection into Wilstead along the 'old' route of the A6
- 5.3 The proposals are a **comprehensive approach to delivery of a net zero carbon, highly sustainable development within the southern parish of Wilstead**. The proposed development would meet the requirements of national policy, particularly in relation to climate change, and would be an exemplar development that would assist the Council as **a flagship scheme** to lead the way for other developments to follow, so assisting the Borough in moving towards becoming a net zero carbon Borough.
- 5.4 The Site is in a **single ownership, is available and is deliverable**, being actively promoted by AWG in conjunction with the landowner. It is not reliant upon any

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<sup>4</sup> Definition of Next Zero Carbon for operational energy: "When the amount of carbon emissions associated with the building's operational energy on an annual basis is zero or negative. A net zero carbon building is highly energy efficient and powered from on-site and/or off-site renewable energy sources, with any remaining carbon balance offset".  
Source: Government Property Agency, Net Zero and Sustainability Design Guide – Net Zero Annex, August 2020

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third parties and would be capable of “consuming its own smoke” in terms of infrastructure. The Site could, therefore, be delivered early within the plan period.

- 5.5 The proposed development has several key benefits that meet the aims and vision of both the Local Plan, and national policy. In addition to being a **net zero carbon development with renewable energy and heat** alongside development, it would **deliver multi-generational housing** and **a new school**, as well as **major highway improvements**. The ability to connect to the settlement of Wilstead with a new cycle/footpath connection enhances the sustainability of the Site, and enhanced by the topography, it is in an excellent location to connect to the new Wixams station, the proposed East-West rail station north of Stewartby, and the nearby proposed Bedford Business Park. The homes would therefore be in an excellent location by **providing opportunities for people to live and work locally and reduce reliance upon the private car**.
- 5.6 The Site Proforma confirms that **the land is adjoining a defined settlement area**, and that there are no major issues that would preclude the allocation of the Site. Turning to more detailed aspects of the Council’s assessment and, in turn, the evidence base for this Local Plan, there are a number of positive matters which further point towards the case for allocating this Site.

### Highways and Access

- 5.7 The Bedford Borough Local Plan Transport Access Assessments document<sup>5</sup> (site ref 686) finds that the proposed highway mitigation is possible and scores the Site with an amber rating. It does not highlight any technical issues with the Site and, those matters that score less well (namely bus stop and cycle connectivity) would be addressed as part of the development.
- 5.8 The highway summary of the Site correctly notes that a development of this scale would have the ability to either provide its own bus stop or deliver a flexible public transport service. Thus, the scoring of the Site regarding public transport would improve and, given the proximity to both the Wixams rail station and new East-West rail station near Stewartby and the proposed Bedford Business Park, it would be realistic for a shuttle bus service (or similar) to connect this development, local villages, and those locations.
- 5.9 Turning to cycle, the layout at Appendix 2 shows how the Site would connect to Wilstead, with a new cycle connection along the former route of the A6. The topography in this area is relatively flat, and thus conducive to cycling, and therefore the Site is one that would be a realistic cycling option for residents to choose to cycle.
- 5.10 Finally, the delivery of **a new roundabout at the Chapel End Road/A6 junction** (as shown in Appendix 4) **would deliver wider highway benefits**. Presently this junction is one which has experienced several accidents over recent years, a risk that may be increased given future development pressures in the locality. The delivery of a new roundabout would have **considerable benefits in terms of highway safety**, whilst not resulting in congestion issues on the A6 given the distance to other junctions.

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<sup>5</sup> Link in paragraph 5 of the Site Assessment Pro Formas June 2021

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## Heritage

- 5.11 The summary Site Proforma refers to potential harm to heritage assets. However, upon examination of the Historic Environment Assessments<sup>6</sup> that forms part of the evidence base, the assessment finds that there are no known heritage assets, and only that a “pre-determination evaluation will be required”.
- 5.12 The document also confirms that there is unlikely to be an impact on Listed Buildings. The concluding comments in the assessment, that, in effect, find that there ‘may or may not be’ a harmful impact on heritage assets or their setting is misleading, if not completely incorrect.
- 5.13 There is, therefore, **no reason to find that the Site should be excluded on heritage grounds.**

## Landscape

- 5.14 The Site sits within the East Marston Clay Vale (5E) as identified in the Landscape Character Assessment (2014, updated 2020) (‘the LCA’). The LCA finds that this area has a number of urban and built form influences, namely:
- Large scale industrial features such as distribution warehouses
  - Roads, such as the A6, with a strong visual and audible presence
  - The urban edge of Bedford and development along the A6 associated with Wilstead bringing urban fringe characteristics.
- 5.15 The vale is low lying, and the Site itself sits within this low topography. The Site benefits from the change in levels to the east and south, and the Ancient Woodland to the east of the Site. This change in topography, along with the woodland, **provides a sense of enclosure for the Site**, separating it from the changing character further south and **preventing the feeling of encroachment into the wider countryside.**
- 5.16 The LCA in particular identifies that **the settlement edge expansion of Wilstead is a potential future change to the landscape**<sup>7</sup>, thus acknowledging that growth in this area is something the landscape is likely to accommodate. Moreover, the LCA identifies (para SE.1.42 p.120) that **this future growth must prevent linear expansion and the merger of villages**, with specific reference to the potential for the merger of Wixams with Wilstead.
- 5.17 This means that, based on the LCA, **the only possible location for growth of Wilstead is to the south.** Any growth to the north or west would lead to a potential merger with Wixams, whilst to the east there is the risk of coalescence with Littleworth.
- 5.18 Plainly, therefore, **allocating the Site for development would be a logical approach considering the landscape evidence base** for the Local Plan.

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<sup>6</sup> Link in paragraph 5 of the Site Assessment Pro Formas June 2021

<sup>7</sup> Page 119, Landscape Character Assessment (2014, updated 2020)

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## Summary

- 5.19 The land at West Park Farm, south of Wilstead, is being actively promoted for a **net zero carbon development of some 515 homes, with a school, multi-generational housing, transport infrastructure and large-scale renewable energy and heat.**
- 5.20 The Local Plan **evidence base finds that this location is a logical and appropriate location for development;** indeed the LCA actively points to this location (by process of elimination) for future growth. **The Site would accord with the emerging development strategy for BBC and would deliver housing in a sustainable location, together with renewable energy, as advocated in the NPPF.**
- 5.21 The land at West Park Farm should therefore be allocated for development (housing and renewable energy) within the Local Plan.

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## 6.0 Summary and Conclusions

- 6.1 These representations have been prepared on behalf of Arnold White Group, a strategic landowner and promoter with a proven track record of delivery of housing, commercial and renewable energy developments in Bedfordshire.
- 6.2 This response finds that the Local Plan suppresses housing need and is not positively prepared considering the emerging Arc Spatial Framework. The level of housing growth proposed in the Plan is not sufficient to meet local needs, nor does it facilitate Bedford Borough's active shaping of the Arc Spatial Framework in this area.
- 6.3 The Plan also fails to adequately address climate change, with a complete failure to meet the NPPF requirements and an absence of any evidence base documents that grapple with this issue.
- 6.4 The representations support the proposed Option 2a Development Strategy as set out in the Local Plan.
- 6.5 Furthermore, the representations demonstrate that the land at West Park Farm should be allocated for a housing and renewable energy development, which would deliver over 500 net zero carbon homes with a new school and associated infrastructure, in accordance with the evidence base and proposed Development Strategy.

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## Appendix 1: Site Location Plan

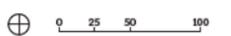


 Site boundary



Land South of Wilstead  
Site Boundary

1-129\_101 | 03-09-2021 | 1:5,000@A3



built form  
resource



01865 26456 Oxford Centre for Internet on New Road Oxford OX1 1BT  
info@builtformresource.com www.builtformresource.com

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## Appendix 2: Illustrative Masterplan



- |  |                            |  |                              |  |                                 |
|--|----------------------------|--|------------------------------|--|---------------------------------|
|  | Site boundary              |  | Residential                  |  | Street trees                    |
|  | Village                    |  | Multi-generational housing   |  | Allotments                      |
|  | Arable and pasture         |  | Community Hub                |  | Woodland planting               |
|  | Woodland/trees             |  | Retail/café with EV charging |  | Species rich grassland          |
|  | Public footpath            |  | School                       |  | Retention basin                 |
|  | Proposed principal access  |  | Solar photovoltaic array     |  | Indicative street pattern       |
|  | Proposed pedestrian access |  | Public Green                 |  | Proposed pedestrian/cycle route |
|  |                            |  | Playing fields               |  |                                 |

**AWPromotion**  
 Land South of Wilstead  
 Concept Masterplan

1-129\_100.A | 03-09-2021 | 1:5,000@A3

0 25 50 100



01865 26456 Oxford Centre for Internet on New Road Oxford OX1 1BT  
 info@builtformresource.com www.builtformresource.com

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**Appendix 3: BBC Site Assessment Pro Forma June 2021**

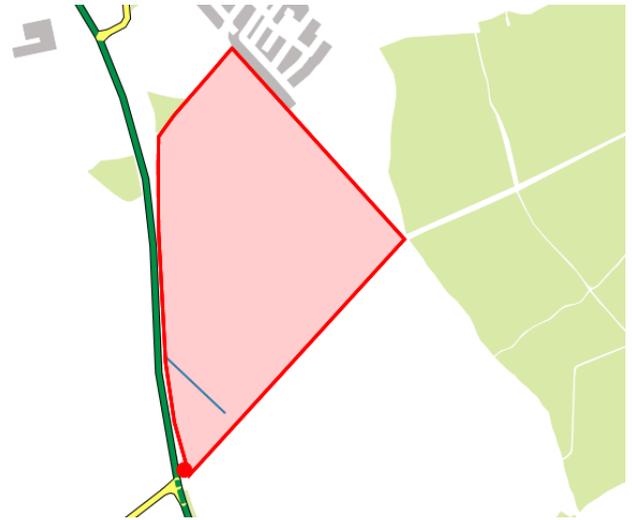
ID 686

**a) Address of site** Land at West Park Farm  
Adjoining Weststead MK45 3RD Please see  
attached drawing: ref APL046 1. c.21 ha.

**a) What is the primary use you propose for the site?**

Housing

Site size (ha)	The number of dwellings the site could provide.	The gross floor space the site could provide.	Site size threshold Above
19.94	525 Dwellings	c.335,000sqm	



**Site selection criteria**

**1a. Within or adjoining UAB SPA or built form of a small settlement**

? The site is within or adjoining a defined settlement policy area or within the built form of a small settlement.

**1e. Outside, adjoining or within the air quality management area?**

+ The site is not within or adjoining the air quality management area.

**2a. Within or adjoining site of nature conservation importance**

x The site is within or adjoining a site of nature conservation importance

**2b. In an area where protected species are known or likely to exist?**

xx Protected species recorded on the site

**2c. Potentially able to achieve a net gain in biodiversity?**

? Uncertain or insufficient information

**2d. Able to link into the green infrastructure opportunity network?**

No answers chosen.

**3a. Proposing a renewable energy scheme or extra energy efficiency standards?**

No answers chosen.

**4a. Likely to impact on designated or nondesignated heritage assets or their settings?**

x The proposal has the potential to cause harm to heritage assets. This harm may range from low to high. There may be options to avoid, reduce or mitigate this harm and where sites have not been ruled out together for other reasons, further assessment will be undertaken to more fully explore impacts on significance and options for harm reduction and mitigation. This further assessment may ultimately lead to the conclusion that the site should not be allocated.

**5a. Likely to increase future economic and employment opportunities?**

No answers chosen.

**6a. Proposing a main town centre use in, on the edge or outside of a town centre?**

No answers chosen.

**8b. Within the existing settlement form?**

+ The site adjoins a defined settlement policy area or the built form of a small settlement.

**Site assessment conclusions**

No answer given.

**9a. On previously developed land?**

x The site is not previously developed and as defined in the NPPF.

**9b. On best and most versatile agricultural land ie grades, 1, 2 or 3a?**

? The classification of the site is not known or it is not clear whether it is classified as grade 3a or 3b.

**10a. Within a groundwater source protection zone?**

+ The site is not located in a source protection zone.

**11a. At risk of flooding?**

+ The site is within flood zone 1 (areas that have been shown to be at less than 0.1% chance of flooding in any year).

**15e. Connect highway without constraint?**

x Serious access constraint with impacts

**15f. Highway or junction capacity issues**

? Potential capacity problem requiring mitigation

**Highway comments**

While the A6 experiences little to no traffic congestion in the site area, the nearby Chapel End Road and Church End Road both have moderate congestion during peak hours. No formal cycling provisions on the A6, however there is no pedestrian access, so effectively there is no public transport provision. The proposed access to the site would, if possible, be taken directly from the A6, requiring significant works. The applicant suggests that the scheme could provide a strategic expansion of Weststead via a new roundabout on A6 to improve the junction at Chapel End Road. Realignment of access from Weststead through the site to improve access at Luton Road/A6 junction is also suggested. The site would benefit from its own bus stop or flexible public transport service.

**Contaminated Land**

No answers chosen.

**Environmental Health**

noise from A6 road

**Minerals & Waste**

No answer given.

**Natural England Risks Opportunities**

Does not pose risk

**Mineral Safeguarding Area**

Site does not fall within the boundary of a MSA.

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**Appendix 4: Proposed new roundabout at Chapel End Road/A6 junction**



Drain  
 Track  
 1:22m RH

A6 TO BEDFORD

PROPOSED NEW  
 ROUNDABOUT  
 JUNCTION TO  
 CURRENT DMRB  
 STANDARDS

INDICATIVE SITE  
 ACCESS

50m ICD

POTENTIAL OFF  
 ROAD CYCLEWAY

CHAPEL END ROAD

POTENTIAL OFF  
 ROAD CYCLEWAY

PROPOSED A6  
 CARRIAGEWAY  
 REALIGNMENT

52.2m

Def

A6 TO LUTON

Rev	Description	Drm	Chk	Date
REVISIONS				
	Preliminary Issue		Submitted for S104	
	Planning Issue		Issued for Tender	
	Submitted for S38		Issued for Construction	
	Submitted for S278		As Built	
DRAWING STATUS				

**STUART MICHAEL ASSOCIATES**  
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JOB TITLE  
 LAND SOUTH OF WILSTEAD  
 AT WEST PARK FARM

DRAWING TITLE  
 INDICATIVE ACCESS ARRANGMENTS  
 TO/FROM A6

DATE	AUG '21	DRAWN	JGP	CHECKED	SMA	ISSUE CHECKBOX
DRAWING No.	6755.001	REV	.	SCALE	1:1000	© A2

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