



Local Plan 2040

Have Your Say on the Future of Your Borough

Bedford Borough Council – Local Plan 2040 Draft Plan Consultation Response Form

We would prefer to receive your comments via our online system

www.bedford.gov.uk/localplan2040

In particular, if you are a planning consultant or agent please help us to speed up the production of local plans by using the online system. If you require assistance, please contact us on 01234 718070.

Please only use this form if you cannot respond online and to make your comments on the Local Plan 2040 Draft Plan and its supporting documents. You will need to have the document you want to comment on to hand so that you can enter the appropriate references. Copies of the document are available to view on the Council's website www.bedford.gov.uk/LocalPlan2040 and in paper copy (by 45 minute appointment) at Bedford Central Library, Harpur Street, Bedford MK40 1PG (01234 718174). Subject to Covid restrictions being lifted on 19th July, paper copies will also be made available at all libraries in the borough, plus the key documents will be available at Rushden, St Neots, Biggleswade and Flitwick libraries during normal opening hours.

Please email this response form to us: planningforthefuture@bedford.gov.uk

Alternatively, responses can be sent by post. Please attach a stamp and send to:

Planning Policy Team
Bedford Borough Council
Borough Hall, Cauldwell Street
Bedford, MK42 9AP

PLEASE DO NOT SUBMIT COMMENTS IN MORE THAN ONE FORMAT OR SEND TO MORE THAN ONE EMAIL ADDRESS. If you have submitted comments electronically you do not need to print and post them. **All responses (electronic and paper) must be received by 5pm on 3 September 2021.**

Your contact information will be kept on the Planning Policy database so that we can keep you up to date about this and other planning policy documents. Personal data will be collected and processed in accordance with the Data Protection Act and the General Data Protection Regulations. Further information can be found on the council's Data Protection webpage and in the Privacy Notices for planning policy.

All responses will be made public.

CONTACT DETAILS

Personal details

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AGENT DETAILS (if applicable)

If you are a planning consultant or agent, you can do this on-line. You will be able to save a draft to complete later, save the final version for your records, save paper and speed up plan making. If you require assistance, please call 01234 718070

Title as above

Name _____

Job title (if applicable) _____

Organisation (if applicable) _____

Address _____

Postcode _____

Telephone Number _____

Email _____

If you are using an agent, who would you prefer any correspondence to go to?

(Please mark X one box only)

Contact agent

Contact client

Contact both

Your interest (Please mark X one box only)

Land owner

Resident

Consultant

Agent

Other

Please specify 'Other' (please write in)

Please use a separate form (this page) for each consultation document paragraph, policy or evidence base document you are commenting on.

Which paragraph number, policy number or evidence base document are you commenting on?

Draft Strategy Option and Draft Policies Paper/ Development Strategy Paper

Please add your comments in the box below, and continue on an additional sheet if necessary.

We are responding generally to the Regulation 18 consultation as a whole, but specifically focus our comments on the overarching strategic Development Strategy Paper- please see attached representation.

BEDFORD BOROUGH COUNCIL (BBC) - LOCAL PLAN REGULATION 18 CONSULTATION - COLWORTH GARDEN VILLAGE

Representations on behalf of Wrenbridge Land Ltd/Fiera (in associations with Unilever)

24 August 2021

INTRODUCTION

1. These representations to the Bedford Borough Council Local Plan Regulation 18 and relevant supporting documents have been prepared by Rapleys on behalf of Wrenbridge Land Ltd / Fiera in association with Unilever (herein referred to as 'Wrenbridge / Fiera'). They seek to advance the case for the allocation of Colworth Garden Village ('CGV') as a new settlement option, concurrently providing for, and facilitating, the expansion and growth of Colworth Science Park, within the Local Plan Review in the context of
 - The technical work undertaken to date, and
 - The Oxford-Cambridge Arc.

Colworth Garden Village Proposals

2. Wrenbridge / Fiera have a promotion agreement with Unilever over the agricultural land known as Lee Farm which surrounds the Colworth Science Park to the north-west of the settlement of Sharnbrook. Unilever are the largest occupying tenant of the Science Park. A Site Location Plan is enclosed at **Appendix 1**.
3. The CGV proposal comprises:
 - 4,500 mixed tenure dwellings
 - Circa 7ha of employment land allowing for the expansion of the Science Park
 - Associated social and community infrastructure, including primary schools, local shops
 - Associated green and blue infrastructure including the retention of existing woodland habitat, golf course, etc and the creation of new habitat, playing fields, Suds features, bunding & landscaping within a 'country park' etc
 - Two new access roads to the A6 including the creation of a new access from the Science Park through the development, and an assumption that access to Santa Pod will also be made available along the Forty Foot Land route
 - A parkway railway station which would have two platforms, pedestrian footbridge, passenger waiting facilities, bus interchange and parking for some 500 cars and cycles.
4. To this extent, Wrenbridge/Fiera are working closely with the owners of the Colworth Science Park as they will be a beneficiary of the CGV development proposals (see later paragraphs in this submission).

TECHNICAL WORK UNDERTAKEN -BACKGROUND TO THE PROMOTION

5. The site, including the Science Park, was originally submitted for consideration in the Call for Sites exercises held in 2016 and 2017 and was subsequently identified as a proposed allocation in the January 2018 Regulation 19 Submission version of the Bedford Local Plan 2035. However, due to Bedford Borough Council ('BBC') concerns over the deliverability of the allocation relating to noise mitigation (from Santa Pod) and the railway station, in May 2018 the Council considered that it was not possible to continue with the submission of the plan as originally intended. As a result, a new Regulation 19 Submission version plan was consulted upon in September 2018 which shortened the Plan period to 2030, reduced the overall housing requirement and thus removed the CGV proposed allocation. Following Examination during the Summer of 2019, the Bedford Local Plan 2030 was formally adopted in January 2020 (without the inclusion of the CGV).
6. As part of the 2030 plan preparation process, a considerable body of technical evidence and representations has been amassed in relation to the site and is available on the BBC website. This has subsequently been supplemented with further technical information (as specifically requested by Officers on matters such as noise mitigation and layout design, heritage impact, viability, and an updated rail outline business case) as

part of the immediate review process of the adopted 2030 Local Plan required under policy 1 through the Call for Sites and Issues and Options consultations of August 2020. A schedule of submitted documentation is attached at **Appendix 2**.

7. Notwithstanding this, Officers have made further requests for additional information on (i) ecology (through English Nature) - specifically the impact on nearby designated sites, (ii) the A6 road corridor traffic impact and mitigation options through the use of the strategic model (which only became available in late spring), (iii) alternative solutions for noise and design mitigation, and (iv) rail.
8. Wrenbridge/Fiera consider that everything that can reasonably be expected to support a local plan proposed allocation at this Regulation 18 stage of the plan-making process has already been produced and submitted to BBC. Indeed, the body of evidence sitting behind the CGV proposal is vastly more both in quantum and level of technical detail than has been submitted, as part of the Local Plan 2040 review process, for any of the other new settlement options being promoted, particularly those that BBC appear to be favouring within the Regulation 18 documentation.
9. In this context, no further technical submissions to support the promotion of CGV are being made at this time. The current body of evidence, as referenced in Appendix 2, confirms the site to be sustainable in environmental, economic and social terms. Further submissions are not necessary. The allocation of CGV is merited (and is further underscored by the emerging themes of the OxCamb Arc - see below) and, in this respect, Wrenbridge/Fiera looks forward to collaboratively working with Officers over the coming period to inform its inclusion in the Regulation 19 Plan.

OXFORD-CAMBRIDGE ARC

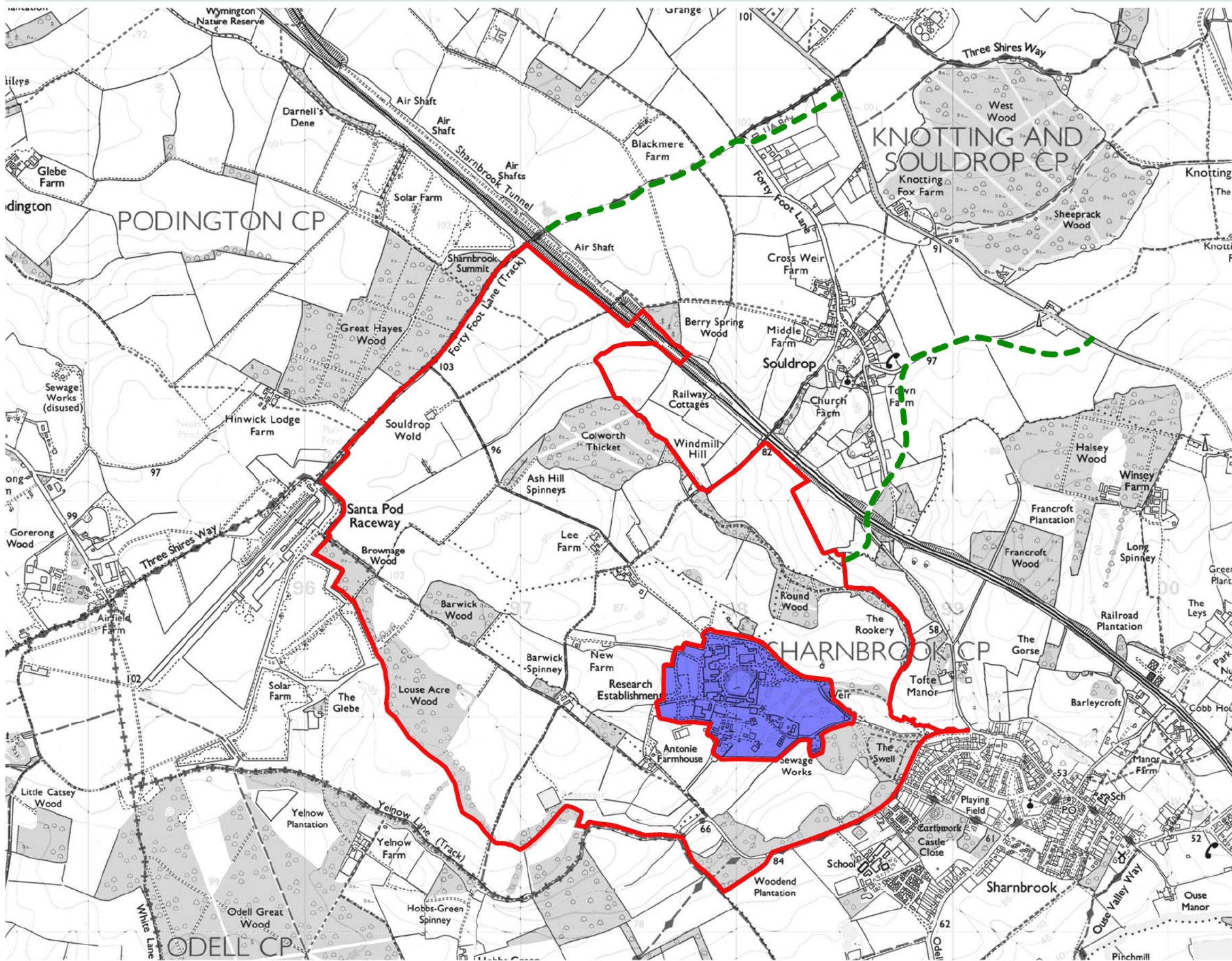
10. Bedford Borough is located towards the centre of the Oxford - Cambridge Arc (the 'Arc') and is one of some 23 local authority areas that fall within it. The area is one of the most economically successful in the country and competes internationally for high-tech and science investment. The Government has identified the Arc as a key economic priority and announced a range of measures seeking to maximise its potential.
11. Unfortunately, however, as is often the case in the plan making process, the timing of complimentary planning strategies that need to have regard to each other does not always run in sequence.
12. The BBC Issue and Options documentation published in August 2020 acknowledged that one of the key reasons that the Inspectors insisted on the inclusion of an early review requirement within the adopted Local Plan 2030 was that it does not appropriately respond to the longer-term growth requirements of the Arc. It is therefore of critical importance that the key objective underpinning the ongoing Local Plan Review is supporting Government's ambitions in respect of economic growth within the Arc.
13. However, as a result of the review policy in the 2030 Plan, BBC is working to a strict timescale to produce a new Local Plan, which is out of sync with the publication of the Arc spatial framework strategy. The Regulation 18 'Draft Strategy Option and Draft Policies Paper' and the 'Development Strategy Paper' published at the end of June 2021 acknowledge that the housing and employment development quantum identified for the 2040 Plan (some 12,500 dwellings and 123ha employment land) reflect the Borough's own need, but not any additional requirements that may arise from the Arc itself.
14. To a certain extent this is understandable, given the lack of confirmed Arc guidance in relation to precise figures for housing and employment expectations within Arc local authorities. Whilst previously there had been much discussion around a figure of some 1 million homes being provided across the Arc, recent months have seen the Government stepping back from that ambition. Indeed, the two 2021 publications, '*Planning for Sustainable Growth in the Oxford-Cambridge Arc: An introduction to the Oxford-Cambridge Arc Spatial Framework*' (February 2021) and the recent consultation document '*Creating a Vision for the Oxford-Cambridge Arc*' (July 2021) falls short of announcing any development quantum across the Arc, let alone within each of the affected local authority areas.

15. That said, the July 2021 Arc consultation document paragraphs 1.7-1.10 make it very clear that the Arc Spatial Framework will be national planning and transport policy creating a vision for the area to 2050 - it will sit alongside the NPPF and all Local and Neighbourhood Plans within the Arc will have to accord with it notwithstanding where they are in the process.
16. The potential timing is such that the current Bedford Local Plan review to 2040 will be at Examination (during 2023) at the same time the Framework is to be adopted. The Regulation 18 consultation indicates an emerging preference for growth, inclusive of the creation of new settlements (Wyboston and /or Little Barford) around the potential new stations on the East West Rail corridor at St Neots south or Tempsford. Whilst this reflects in part the ambition of paragraph 5.8 of the July 2021 paper (..‘*examining and developing the case for new and/or expanded settlements in the Arc, including options informed by possible East-West Rail stations between Bedford and Cambridge*’), we consider that it does not accord entirely with it.
17. The spatial framework premise for the Arc is transport-led sustainable growth - economic supported by associated housing, building on and expanding its existing strengths of quality employment opportunities. Paragraph 5.8 (July 2021) also recognises the potential opportunities for new settlements over and above those cited along the East West Rail corridor and ‘*the government will undertake additional Arc consultation on specific proposals that may come forward*’ - Colworth is such a location. Paragraph 5.8 goes on to say that ‘*The Spatial Framework will guide the future growth of the Arc to 2050, including on the question of new housing and infrastructure and will, as part of its development, take into consideration any significant new housing and infrastructure coming forward to meet the Arc’s ambition*’. CGV meets this ambition absolutely, being focussed around the established, but considerably underplayed quality employment location of Colworth Science Park, providing it with land for expansion as well as new sustainable travel/access opportunities that would not otherwise be realised, through the provision of a new railway station and direct access to the A6 alongside 4,500 homes.
18. Paragraph 5.6 (July 2021) continues this same theme, emphasising the identification of ‘*opportunity areas*’ to accommodate growth that comes forward as part of the Arc - Colworth is such a location.
19. A major emphasis of this government is on levelling up economic opportunities throughout the country and we see this within the Arc itself. Paragraphs 3.3 and 3.4 (July 2021) note that the considerable economic and wage growth experienced in the cities of Oxford, Cambridge and Milton Keynes has not been felt in all towns and cities of associated rural areas. The inclusion of the less affluent areas of Northamptonshire such centres as Corby, Kettering, Northampton are a case in point. They are located some way from the East West Rail route, but importantly, still connected to the main Arc corridor via the Midland Mainline into Bedford, passing directly adjacent to Sharnbrook and the Colworth Science Park. Historic travel to work data indicates that many employees at the Science Park commute in from Northamptonshire. Unfortunately, the expansion and future viability of the Science Park is compromised by its current reliance on car-based transport. The delivery of a railway station at Colworth and further land for expansion supported by the creation of CGV provides a sustainable growth solution that fits exactly within the levelling up, economic and transport led opportunity area principles of the Arc.
20. CGV (i) supports the East West Rail growth philosophy as it connects into this route at Bedford, just one stop away; (ii) it assists the levelling up opportunity within the northern part of the Arc providing a direct sustainable transport link back down to the East West Rail; (iii) alongside the provision of housing it also allows for expansion of the Science Park which would otherwise be constrained, and (iv) such expansion of specialist employment offer would be complimentary to that likely to be provided along East West Rail corridor.

CONCLUSIONS

21. The Government has identified the Oxford - Cambridge Arc as an economic growth corridor that is fundamental to the future economic success of the United Kingdom. This recognition has been identified in publications for several years and is further emphasised in the latest February and July 2021 publications.

22. It has set out a clear ambition to build upon the emerging successes evident within the Arc to ensure that it becomes globally significant (a UK version of ‘Silicon Valley’). The Government recognise that central to this ambition is the delivery of the economic growth supported by sustainable transport-led infrastructure and the provision of homes. This view is shared by Bedford Borough, as evidenced by The Oxford-Cambridge Arc: Government Ambition and Joint Declaration issued in March 2019.
23. The need for this Local Plan review is in large part due an acknowledgement that recently adopted Local Plan 2030 does not appropriately respond to the longer-term growth requirements of the Arc. It is therefore of critical importance that the key objective underpinning the Local Plan Review is supporting economic growth that is significant in both a national and international context. Every aspect of the Local Plan Review should acknowledge and be driven by this ambition.
24. Whilst the emerging preferred strategy with its focus on the East West Rail corridor and the potential for new settlements alongside its new stations is reflected, in part, with this emerging OxCamb Arc ambition, the Local Plan does not go far enough - it ignores the principle of a new settlement on anything but the East West Rail corridor, missing the obvious ‘opportunity area’ that is presented by the comprehensive CGV proposal to provide a sustainable development based around a railway station and existing high quality economic hub that can act as a catalyst for levelling up, not only within the more rural areas of Bedford Borough itself, but also extend its influence northwards into the Northamptonshire fringe areas of the Arc.
25. The evidence base that has been submitted to BBC is extensive and comprehensive, identifying that CGV is sustainable and deliverable and, when coupled with the steer of OxCamb Arc, is a justifiable addition for inclusion within the BBC Local Plan development strategy. Any outstanding matters (targeted submissions) needing clarification can readily be addressed in lead up to the publication of the Regulation 19 plan later in 2022. CGV should, therefore, be recognised as an allocation within the Regulation 19 plan.



- Promotion Site Boundary
- Colworth Science Park
- Access

SITE PLAN
 Colworth Garden Village
 BEDFORDSHIRE
 (August 2020)

Scale @ A3 : Not to Scale
 Plan No. : 82/199/1_SP01a



APPENDIX 2: CHRONOLOGY OF EVIDENCE BASE SUBMISSIONS MADE SO FAR TO SUPPORT COLWORTH GARDEN VILLAGE

August 2021

DECEMBER 2015

Call for Sites Submission, form, covering letter - Deloitte/Wrenbridge

JUNE 2016

Colworth Vision Document - Planit
Planning and Housing Assessment Report - Rapleys
Transport Feasibility Report - PBA
Utility Infrastructure Report - PBA
Flood Risk Assessment Report - PBA
Environmental Considerations - EDP
Phase 1 Ground Conditions Assessment Report - PBA
Energy Technical Note - PBA
Landscaping Supporting Evidence - Planit
Savills letter on costs

AUGUST 2016

New Utility Supplies Technical Note - PBA
Acoustics Response to BBC comment Technical Note - PBA

MARCH 2017

Environmental Sound Survey Report - PBA
Preliminary Noise Impact Assessment Report - PBA
Response to BBC Scoring Matrix and transport comments - PBA
Overall Response Table - Team
Financial Viability Submission - Rapleys
Response to BBC Scoring Matrix/Comment on Ecology/Archaeology - EDP
Access Land Update Information - Wrenbridge

JUNE 2017

Representations to the Issues and Options Consultation

OCTOBER 2017

A6 Preliminary Corridor Study - PBA
Noise Mitigation Addendum 1 - PBA
Duty to Co-operate Note - Rapleys
Financial Viability Assessment Addendum - Rapleys
Infrastructure Costs Estimate - Rapleys

NOVEMBER 2017

Rail Station Feasibility Report - PBA
Noise Report Addendum 2 - PBA
Final Concept Plan/Development Areas - Planit
Further Submissions Commentary - Rapleys

MARCH 2018

Representations to the Regulation 19 consultation - Rapleys

JUNE 2018

Outline Business Case for the Colworth Rail Station - PBA
Design Report for Revised Scheme - Planit and Arup
A6 Preliminary Corridor Study Update - PBA
Response to Representations Made in Respect of Colworth Garden Village - Rapleys

OCTOBER 2018

Representations to Regulation 19 Consultation - Rapleys

Transport Strategy and Highway Assessment - NCC and Milton Earnest Junctions - PBA

Acoustic Modelling Report (follow up to Design Report of June 2018) - Arup

Colworth Railway Station - Outline Business Case - PBA

Heritage Impact Assessment Report - response to Historic England criticism of BBC evidence base - EDP

AUGUST 2020

Local Plan Review to 2040 - Call for Sites Submission Form - Rapleys

Heritage Impact Assessment Report - EDP

Transport Technical Note - Stantec

SEPTEMBER 2020

Representations to Local Plan Review 2040 - Issues and Options Consultation - Rapleys

OCTOBER 2020

Supplementary information on the Design Response to Noise and Heritage Considerations Report - Planit & Arup

DECEMBER 2020

Financial Viability Assessment - Rapleys

FEBRUARY 2021

Colworth Station Outline Business Case - Stantec