



BEDFORD BOROUGH COUNCIL LOCAL PLAN 2040
Strategy Options and Draft Policies &
Site Assessment Pro Formas Consultation
June 2021

Land at Gibraltar Corner, East and West of Home Road, Kempston
(Site: ID 1333)

Prepared by Strutt & Parker on behalf of Axis Land Partnerships Limited

September 2021

Site Name:	Land At Gibraltar Corner, East and West of Home Road, Kempston
Client Name:	Axis Land Partnerships Limited
Type of Report:	Strategy Options and Draft Policies & Site Assessment Pro Formas Consultation
Prepared by:	██████████
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Date:	September 2021

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1. INTRODUCTION

- 1.1 This representation has been prepared on behalf of our client, Axis Land Partnerships Limited, in response to the Bedford Borough Council Local Plan 2040 July – September 2021 consultation in respect of the Strategic Options and Draft Policies and Site Assessment Pro Formas. This submission is made in respect of Land to the East and West of Home Road, Gibraltar Corner, Bedford (the Site).
- 1.2 The site, the subject of this representation, was put forward for consideration as part of the 2020 'call for sites' exercise and has now been assessed under site reference ID 1333. It is being promoted on behalf of a single landowner, it extends to 21.80 ha and lies on the northern side of Wood End Lane and Ibbett Close.



Figure 1: Land to the East and West of Home Road, Gibraltar Corner

- 1.3 The following documents are also submitted in support of this representation and should be read in conjunction with this statement:
- Site location plan – Promap;
 - Ramsey Green at Gibraltar Corner Vision Document (September 2020) – Fabrik;
 - Heritage Appraisal (August 2021) – JB Heritage Consulting Ltd;

- Preliminary Ecology Appraisal (August 2021) – Applied Ecology Ltd; and
- Preliminary Transport Strategy (August 2021) – Stantec.

1.4 This statement provides an overview and analysis in terms of housing delivery, having regard to the National Planning Policy Framework 2021 (NPPF), past performance and the need for the inclusion of a significant number of additional site allocations for the future new Local Plan to successfully meet the tests of soundness. It has been split into two main elements as follows:

1. Firstly, it considers the four growth options listed as Option 2a, 2b, 2c and 2d having regard to the need to meet national policy requirements and in particular the emerging spatial framework for growth in the Oxford-Cambridge Arc.
2. Secondly, it includes a review of the site assessment pro forma for the site which demonstrates that the site is suitable for allocation and would make a positive and sustainable contribution to the Borough's required growth strategy.

Background

1.5 The current Bedford Borough Local Plan was adopted in January 2020 and covers a plan period to 2030. It replaced the previous development plan which was made up of a number of documents covering a plan period to 2021. However, due to national policy changes to the way housing numbers are calculated, infrastructure upgrades and potential strategic growth in the Oxford – Cambridge Arc, Policy 1 of the 2030 Local Plan committed to the commencement of a review of the Local Plan within one year of adoption. The review commenced in summer 2020 with an Issues and Options consultation and “call for sites”.

1.6 It is worth noting that the eastern portion of the site previously formed part of a Local Plan 2035 Consultation Paper in 2017 and was identified as a preferred site for development under reference number 146 (Home Road East) (please see below Figure 2). It formed part of a preferred site for an estimated capacity of 500 homes on the edge of the urban area. Figure 2 below does not include the entirety of the site as promoted within this representation and also includes wider land that is outside of our clients control. The site, now put forward (Figure 1 above), comprises the plots shown below as 146, 147 and 153. In addition, the parcel of land adjacent to the north of plot 147 and 153 is included as well.

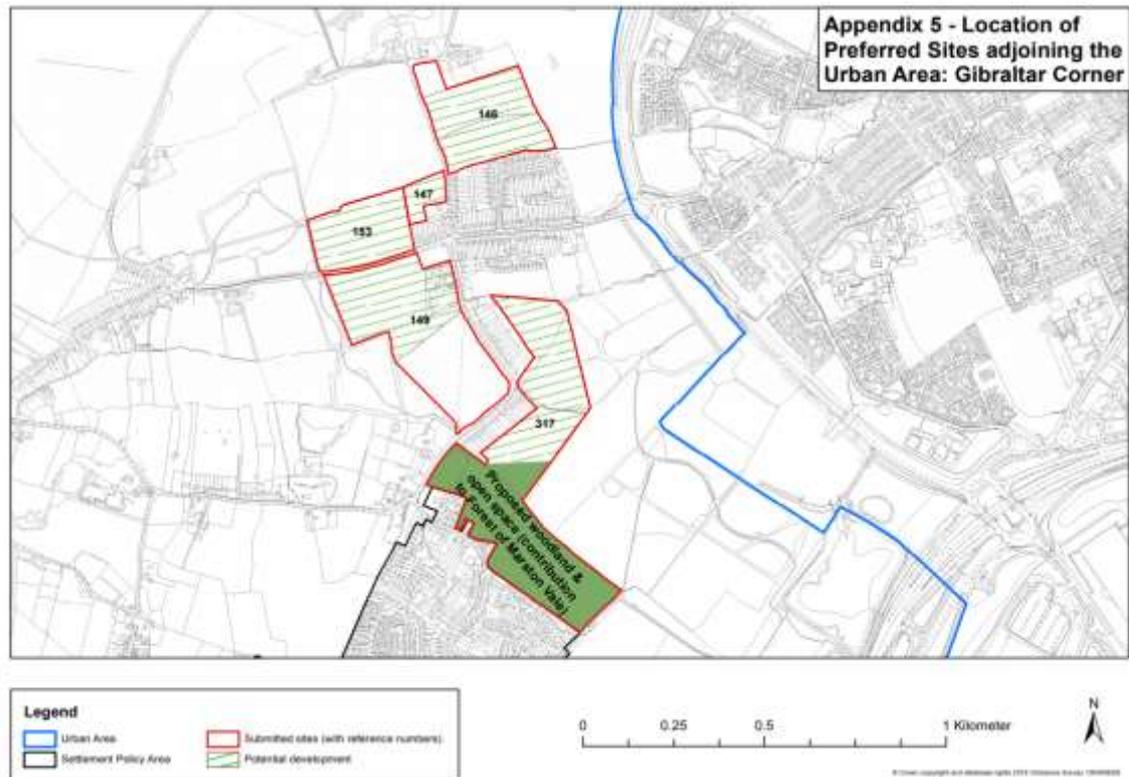


Figure 2: Appendix 5 of Bedford Borough Local Plan 2035 Consultation Document 2017

- 1.7 A detailed description of the site and vision for its development is contained in the accompanying vision document titled “Ramsey Green at Gibraltar Corner”, which was previously submitted in September 2020. The site is located within the Kempston rural parish on the edge of the settlement of Gibraltar Corner. It extends to approximately 21.8 ha and could accommodate in the region of 450 new homes. It lies between the small settlement of Gibraltar Corner and Green End to the north and is made up of land on the eastern and western side of Home Road, from where the access can be obtained, along with further vehicle access from Wood End Lane to the south. Pedestrian links can also be provided to nearby public rights-of-way and Ibbett Close.
- 1.8 The site is located approximately 5 km south-west of Bedford town centre and only 2 km from Kempston High Street. It benefits from good connections to Bedford and Kempston by foot, bicycle and public transport. The village of Wootton, a key service centre, also lies a short distance to the south. The regenerated woodlands of Buttons Ramsey and the Kill lie immediately adjacent to the west and south of the site. The long distance walking and cycling route of the John Bunyan Trail skirts the eastern edge and then passes directly through the north-western corner of the site. These offer excellent outdoor amenities and connectivity directly with nature.
- 1.9 The site is located in a sustainable location, approximately 0.25 kilometres to the west of the A428, 1.43km from its connection to the A421 to the south, providing connections to the wider highway network including the M1 Motorway (London to Leeds), the A6 (Luton to Carlisle) and A1 (London to Edinburgh). There are two bus stops located on Ridge Road (approximately 300 metres) to the south of the site, providing regular bus services Monday – Friday on the number 53 bus to Bedford, Kempston and Wootton, the A2 bus to Kempston, Bromham, Cranfield and Milton Keynes and the C1 bus to Bedford, Marston

Moretaine, Kempston, Wootton, Cranfield, Cranfield University, Newport Pagnell and Milton Keynes. The nearest railway station to the site is Kempston Hardwick, located approximately 3.9 kilometres to the south on the Marston Vale Rail Line, providing an hourly service to nearby Bletchley and Bedford.

- 1.10 In terms of constraints, the site is relatively unconstrained, being located within Flood Zone 1 and is therefore not at risk of flooding. A comprehensive landscape buffer could be provided to the north to ensure no impact on the setting of the three Grade II Listed Buildings located to the north of the site (see accompanying Heritage Appraisal), whilst also contributing towards the Forest of Marston Vale.

2. PLANNING POLICY CONTEXT

National Planning Policy Framework

- 2.1 The “presumption in favour of sustainable development” is at the heart of the National Planning Policy Framework 2021 (NPPF). The Planning and Compulsory Purchase Act 2004 (Section 39(2)) establishes a legal requirement for Plans to be prepared with the objective of contributing to the achievement of sustainable development.
- 2.2 Paragraph 16 of the NPPF requires plans to be prepared positively in a way that is aspirational but deliverable (emphasis added). Paragraph 60 reminds Local Planning Authorities that the Government’s objective is to significantly boost the supply of homes (emphasis added) and that it is therefore important that a sufficient amount and variety of land comes forward where it is needed.
- 2.3 Paragraph 22 requires plans to contain strategic policies which should look ahead over a minimum 15 year period from adoption (emphasis added). Where larger scale developments such as new settlements are proposed; policies are required to set out a vision that looks further ahead at least 30 years (emphasis added) to take into account the likely timescales for delivery.
- 2.4 As set out at Paragraph 35 of the NPPF for plans to be “sound” they need to be:
- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy (emphasis added), where relevant.
- 2.5 These tests need to be applied in a proportionate way to ensure they are consistent with strategic relevant policies for the area.
- 2.6 The NPPF notes that:

Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health (paragraph 105).

2.7 It advises that, when assessing sites that may be allocated, or specific applications for development:

- (a) *appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- (b) *safe and suitable access to the site can be achieved for all users;*
- (c) *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code: and*
- (d) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree (paragraph 110).*

2.8 NPPF further advises (at paragraph 112) that, for development proposals, priority should be given first to pedestrian and cycle movements, and second – so far as possible – to facilitating access to high-quality public transport. However, it also recognises (at paragraph 105) that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

2.9 In respect of heritage matters Paragraph 189 notes that:

“These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.”

2.10 Paragraph 202 goes on to state:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits (emphasis added) of the proposal including, where appropriate, securing its optimum viable use.”

Oxford-Cambridge Arc Spatial Framework

2.11 In July 2021 the Government published a consultation document which set out how they intend to develop a Spatial Framework for the Oxford – Cambridge Arc. The spatial framework is intended to provide a vision for the Arc to guide future growth in the area to 2050. To ensure that sustainability is embedded in the spatial framework the consultation also includes a scoping report in respect of the sustainability appraisal. The Arc covers the county council areas of Oxfordshire, Buckinghamshire, Bedfordshire, Northamptonshire and Cambridgeshire. Once approved the spatial framework will form national planning policy and transport policy for the Arc and local planning and local transport authorities must have regard to it when preparing local transport and local development plans and policies. It will also be a material consideration in the determination of planning applications in the area. This will be the first regional planning

policy document to be prepared since the abolition of regional plans which signals the importance that the Government attributes to the Arc.

- 2.12 The Arc is a national economic priority area which the Government believes has the potential to be one of the most prosperous, innovative and sustainable economic areas in the world, and can make a major contribution to national economic recovery following on from the impact of COVID-19.
- 2.13 It is intended that the framework will facilitate better planning for economic growth, supported by new homes and infrastructure, and deliver more sustainable results. It is intended that it will inform development plans.
- 2.14 The current consultation closes on 12th October 2021 following which a vision and issues and options consultation will be published in spring 2022. The finalised spatial framework will be published for consultation in autumn 2022 with implementation of the final Framework shortly after.

3. THE NEW LOCAL PLAN 2020-2040

- 3.1 This section provides our formal consultation response in relation to the Issues and Options and Growth Options Consultation. It sets out our response in relation to chapters of the consultation that are of relevance in respect of the land that is being promoted at Gibraltar Corner.

Level of Growth

- 3.2 Based on the 'standard method' the new Local Plan will need to identify sites to deliver over 25,500 new homes to meet the Council's housing needs for the period 2020 – 2040, which equates to a delivery 1,275 dwellings per year. To maintain their housing trajectory, the Council will need to identify a range of sites, so that this housing delivery rate can be achieved. Currently, existing commitments total 13,000 dwellings which means the new local plan will need to allocate land for a minimum (emphasis added) of 12,500 dwellings.
- 3.3 Effective housing delivery is essential for the social, economic and environmental prosperity of the District and the wider spatial area of the Oxford – Cambridge Arc. Accordingly, it is critical that the assessment of sites submitted through this Call for Sites process is undertaken in a positive and aspirational manner (NPPF para 16), and in accordance with NPPF paragraph 69, allows the identification of a sufficient level of deliverable and developable sites with sufficient flexibility to react to market trends and economic changes.
- 3.4 The use of the standard method is supported, however, it is considered that the minimum number of dwellings for the period to 2040 should be increased to 15,000 to allow the inclusion of a 20% buffer to build in greater flexibility and more certainty that housing delivery will actually be achieved. While currently housing delivery is meeting the adopted local plan target, this only requires an annual requirement of 970 dwellings per year. There will be a considerable uplift of 280 dwellings per year to meet the 1,275 dwellings required for the new plan.
- 3.5 Based on planned population growth to 2040 the employment land requirement is calculated to be 171 ha. The current supply in the Borough is 48 ha leaving the requirement for a minimum (emphasis added) 123 ha to be allocated in the plan. As with housing, it is considered equally important that a buffer of 20% should be applied to ensure the provision of employment land keeps pace with demand, especially given the economic importance of the Borough within the heart of the Oxford – Cambridge Arc. Accordingly, it is therefore considered that the Plan should be seeking to allocate 148 ha of employment land for the period to 2040.

Plan Period

- 3.6 While this consultation does not specifically seek views on the proposed plan period, it is considered that a longer plan period would be more appropriate. National planning policy requires a minimum 15 year plan period from adoption (emphasis added) and whilst the current programme anticipates adoption in Winter 2023 it is a clearly established fact that local plan preparation nearly always takes longer than anticipated at the outset.

- 3.7 Assuming the local plan is actually adopted at the beginning of 2024 this will only establish a plan period of 16 years. Paragraph 22 of the NPPF requires a minimum 15 year period, however, the paragraph was also updated in the July 2021 version to suggest that plans should have a vision of at least 30 years where new settlements or significant extensions to existing villages and towns form part of the strategy for the area. Clearly, as set out in the current four options, such developments are likely to form part of the strategy and, as such, a longer plan period would seem more appropriate. Furthermore, the nationally emerging Oxford – Cambridge Spatial Framework also seeks to guide growth to 2050. Accordingly given the current early stage of plan preparation it is considered that the Bedford Borough New Local Plan should adopt a plan period to 2050 as well.
- 3.8 Extending the plan period by a further 10 years will require further growth locations to be identified including sites for a minimum additional 12,750 dwellings and a further 62 hectares of employment land. As referred to above, these would be minimum requirements and a buffer should also be imposed, although given the extended length of plan period a reduced buffer of 10% may be considered more reasonable. Adopting such a strategy will allow the plan to consider a wider range of options and contain more flexibility around delivery in the future. This will sensibly allow for the inclusion of new settlements which, whilst slow to deliver, are likely to represent the most sustainable long-term option for economic growth supported by a sufficient delivery of new homes. Such flexibility will be essential to allow the District to maintain housing land supply at an increased rate of 1,275 new homes per year over the plan period.

Vision and Objectives

- 3.9 The proposed vision and objectives set out in Section 2 (pages 11 & 12) are supported, including the statement:

“Good design will help to improve quality of life and to create safer, vibrant and more sustainable places, both in the urban area of Bedford and Kempston and in surrounding village communities.”

- 3.10 However, it may need to be updated to better reflect the chosen growth strategy, especially if that is to include the delivery of one or more new settlements around a new East-West Railway Station.

Housing Trajectory

- 3.11 Paragraph 3.5 of the draft options consultation document suggests that a stepped trajectory approach could be followed, which would mean maintaining the existing supply under the 2030 plan until 2030, and then increasing delivery thereafter for the remaining 10 years. This is not considered to be an appropriate strategy and would be clearly at odds with the policy requirement set out in Policy 1 of the adopted plan, the whole purpose of which was to recognise the need for increased housing delivery based on the application of national planning policy. Furthermore, following such a strategy would not only stifle potential economic growth, but will exacerbate housing affordability, which is clearly acknowledged as a significant issue not only for Bedford Borough but also the wider Oxford – Cambridge Arc.

Growth Options

- 3.12 For the new local plan to meet the tests of soundness at examination it will be extremely important for the growth strategy to be both deliverable and flexible without an overreliance on strategic scale allocations such as new settlements. It is worth noting that the St Albans Local Plan was withdrawn in November 2020 following a number of serious concerns raised by the Inspectors which included an overreliance on a small number of large strategic allocations (500 dwellings or more, or over 14 ha) at the expense of smaller scale subareas. The Inspectors noted that a range of sites, including smaller and medium sites, can provide benefits, in that they can be delivered more quickly without requiring additional infrastructure, provide choice and flexibility in the housing market, and secure affordable housing more immediately. They also referred to paragraph 68 (now paragraph 69) of the NPPF which indicates that small and medium-sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.
- 3.13 The findings of the Inspector in 2020, in respect of the examination of the Uttlesford Local Plan were similar. In that particular case, the Inspector considered it was highly ambitious to rely on three new Garden communities (Easton Park, North Uttlesford and West of Braintree) and not include a wider range of small and medium sized sites as advocated by paragraph 68 of the NPPF.
- 3.14 Accordingly, it is considered the correct strategy for the emerging Local Plan 2020 – 2040 will be to avoid any short term reliance on strategic scale developments such as the new settlements at either Wyboston or Little Barford and instead to include a significant and extensive range of small and medium-size sites.
- 3.15 Paragraph 6.8 of the Strategy Options and Draft Policies consultation document indicates that the new plan should provide three new business park sites, each of about 30 ha with the remaining 63 ha of employment land allocated in smaller sites. However, it is noted that potential employment sites are still being assessed. The employment sites will then be identified to align with the preferred growth strategy. Again this suggests that a more flexible strategy with a wider choice of potential site allocations should be followed.
- 3.16 The four growth strategy options are listed as follows:
- Option 2a:** Development in and around the urban area, plus A421 transport corridor with rail based growth parishes and southern parishes.
- 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.
- Option 2c:** Development in and around the urban area, plus A421 transport corridor with rail based growth parishes and, plus two new settlements.
- 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.

- 3.17 It is noted that all four options will deliver the same amount of dwellings within the urban area and adjoining the urban area (3,000 dwellings) along with 51 ha employment land. It is assumed that the employment land provision will predominantly be made up of existing commitments and therefore the sites for new business parks will need to be found elsewhere. It is also noted that all four options include up to 80 ha of employment land within the transport corridor, rail based growth. It is therefore considered that the extent of employment land should be increased to 90 ha to allow for the identification of three new business park sites of 30 ha each.
- 3.18 It is also noted that all four options aim to deliver a similar total number of dwellings, 12,500 or 13,085 if a new settlement at Little Barford is included. It is however considered that a blended option should be the preferred choice, which is more aspirational, with the potential to deliver a higher number of dwellings along with the maximum amount of employment land to better reflect the national growth aspirations for the Arc.
- 3.19 In respect of the growth options, clearly the opportunities for accommodating any significant further growth within the urban areas of Bedford and Kempston are limited, having already been extended up to their boundaries with the A428. However, the urban areas remain the focus for employment and retail activity and transport connectivity within the Borough. It therefore seems logical and sustainable to identify opportunities for future growth in close proximity to the urban areas, not only in the rail based transport corridor around the five stations and A421, but also in the southern parishes where sites can be identified close enough to the urban areas to allow active travel modes and the use of public transport to be a realistic alternative.
- 3.20 The inclusion of Kempston Rural Parish as one of the transport related southern parishes is therefore strongly supported and the site, the subject of this representation, is one such location. The land at Gibraltar Corner is located only 600 m (0.3 miles) walk from Kempston (at its nearest point). The road from Gibraltar Corner to Kempston has a pavement on both sides and a dedicated cycle and pedestrian route exists under the A428 which provides very safe, quick and easy access to the Lidl supermarket and Kempston High Street. The key service centre of Wootton is only 2 km to the south of the site and a pavement exists along the full length of the road between the site and the centre. Wootton provides an alternative range of services and facilities.
- 3.21 Bus stops are located approximately 330 m to the south of the site and regular buses are provided to Bedford, Wootton, Kempston, Bromham, Cranfield and Milton Keynes (Buses 53, 53A, A2 and C1). This also means there is convenient access to Bedford train station (Buses 53 and C1) connecting Bedford to London and the wider south-east region. The site is also located conveniently for connections to the wider highway network with easy access to the A421 and A428.
- 3.22 Allowing growth in the southern rural parishes not only represents a sustainable location for housing delivery close to the Borough's main source of employment within the Bedford urban area, but will also allow new homes to be provided in a high quality environment, where future occupiers will also have opportunities to access the countryside for leisure purposes, improving their health and well-being. Furthermore, development in these well located parishes is less reliant on upgrades to infrastructure and will be deliverable early

on in the plan period. It is therefore considered vital that the selected growth options include the opportunity for growth in the southern parishes and especially Kempston Rural.

3.23 Of the settlements within the Kempston Rural Parish, Gibraltar Corner benefits from being located the closest to Kempston and therefore is a logical settlement within the Parish to allocate for new growth.

3.24 In respect of the specific options we comment as follows:

Option 2a: Strongly Support – this option delivers the greatest range of sites including small and medium-size sites, which will ensure that housing delivery, and importantly affordable housing delivery can be maintained. However, it is considered that the employment allocation should be increased to a minimum of 90 ha in the transport corridor. This is also in line with the findings of the Development Topic Paper, which concluded that the sustainability appraisal found option 2a to perform best out of the four options as it concentrates most growth at the rail based locations at Stewartby / Kempston Hardwick, which means a high probability that public transport and cycling will be an attractive alternative to the private car.

Option 2b: Support – this option delivers a range of sites including small and medium-size sites, which will help housing delivery, however the inclusion of a new settlement presents a risk to delivery given the lead time associated with such development. The housing numbers in the two transport corridors should therefore be increased to those in option 2a. Accordingly, this is considered to be a more suitable option if the local plan period is extended. It is also considered that the employment allocation should be increased to a minimum of 90 ha in the transport corridor.

Option 2c: Strongly Object – this is the least flexible of all options and includes an overreliance on new settlements. Furthermore, both settlements are in close proximity to each other, and as such delivery is likely to be further delayed as a result of competition in the local housing market. If this option were to be pursued it is considered that the new plan would fail at examination for the reasons set out above, having regard to the recent St Albans and Uttlesford Local Plan examples.

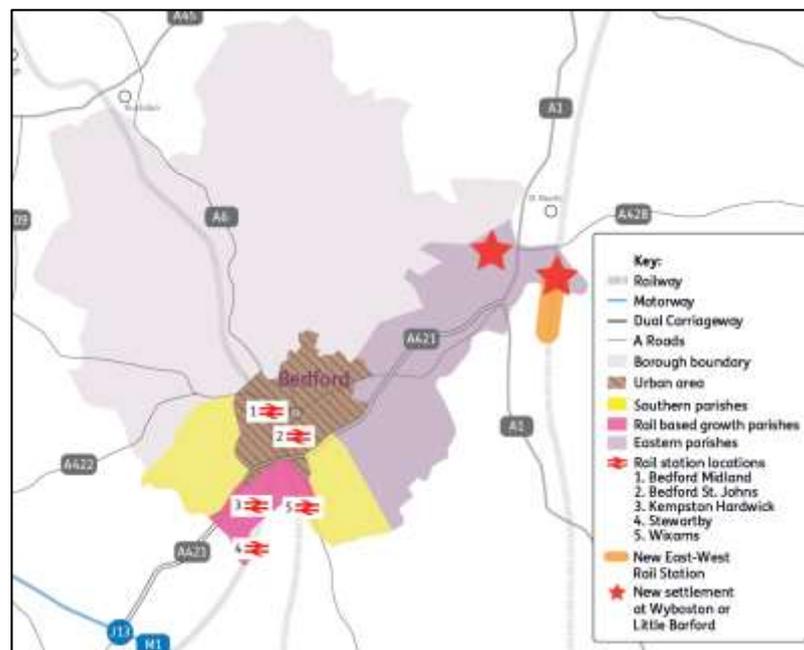
Option 2d: Neutral would support with appropriate modification – This option delivers a range of sites including small and medium-size sites which will help housing delivery, however the inclusion of a new settlement presents a risk to delivery given the lead time associated with such development. The housing numbers in the two transport corridors should therefore be increased to those in option 2a. Accordingly, this is considered to be a more suitable option if the local plan period is extended. It does however, provide sufficient employment land and a greater choice of locations for new business parks.

3.25 Accordingly, we would recommend that the new local plan pursues a blended option based on a mix of Options 2a and 2d as set out below, with a focus for approximately 2000 dwellings within the Southern Parishes. This will provide a sufficient range of sites across the entire plan period without an overreliance on a new settlement being completed by 2040. Such an option is more likely to be considered in line with Paragraph 22 of the

NPPF, which requires plans to contain strategic policies which should look ahead over a minimum 15 year period from adoption and, where larger scale developments such as new settlements are proposed, policies are required to set out a vision that looks further ahead at least 30 years to take into account the likely delivery timescales.

Proposed Option: Development in and around the urban area, plus A421 transport corridor with rail based growth parishes, southern parishes and east parishes, plus one new settlement.

- Within the urban area (1,500 dwellings).
- Adjoining the urban area (1,500 dwellings), up to 51 ha employment.
- Transport corridor – rail based growth: land within the parishes of Kempston Hardwick, Stewartby and Wixams (low option) (7,500 dwellings), up to 90 ha employment.
- Transport corridor – south: land within the parishes of Cotton End, Elstow, Kempston Rural, Shortstown, Wilstead and Wootton (2000 dwellings).
- Transport corridor – east: land within the parishes of Cardington, Cople, Great Barford, Little Barford, Roxton, Willington and Wyboston (750 dwellings), up to 30 ha employment.
- New settlement at Little Barford (3,085 dwellings) or Wyboston (2,500 dwellings), up to 20 ha employment.
- Total between 15,750 and 16,335 dwellings, up to 191 ha employment.



4. SITE ASSESSMENT

- 4.1 The site details and summary of the findings of Bedford Borough Council during the site assessment process can be seen below.

Site Details	
Address	Land to the east and west Home Road, to the north of Wood End Lane and Ibbett Close, Gibraltar Corner, Bedford. The land consists of two parcels either side of Home Road.
ID Reference	1333
Proposed Use	Housing
Dwelling No	Up to 425
Size (ha)	21.80

- 4.2 In 2020, the site at Gibraltar Corner (ID 1333) was submitted as part of the Call for Sites exercise, proposed for residential development of up to 425 dwellings, with associated open space, landscaping and access. A total of 430 sites were submitted through the Call for Sites process, they have been assessed using a ranking system; the system is as follows.

- ++ Major Positive;
- + Positive;
- 0 Neutral;
- Insufficient information;
- x Negative; and
- xx Major Negative.

- 4.3 As a result of this process of evaluation, the Site received 3 ?, 1xx, 2x and 6 +'s. From these results it is clear that the site has development potential and has far more benefits than drawbacks, however, it is considered that some of the rankings should be re-assessed to more accurately reflect the site opportunities and the further supporting information submitted with this representation.

Reassessment of Site ID 1333

- 4.4 The site selection criteria have been revaluated and should be updated accordingly.

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

The Site does adjoin the small settlement of Gibraltar Corner.

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

The Site is not located within an air quality management area.

2a. Within or adjoining site of nature conservation importance

According to the Bedford Borough Policies Map (2020), the Site is not within or adjacent to an area designated for nature and conservation importance. Further to this, the Preliminary Ecological Appraisal states that *“the site is not covered by any statutory wildlife site designation and does not support any ancient woodland”*.

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

In support of the Site being allocated in the emerging Local Plan, Applied Ecology have prepared a Preliminary Ecological Appraisal. In addition to this, an extended Phase 1 habitat survey was undertaken on the 12th August 2021.

It was found that regarding protected species, there is potential for barn owls, skylark, song thrush and yellowhammer birds to be on site. Potential for badgers, otters and hedgehogs was also identified. The potential for great crested newts was identified, however, the closest body of water is 85m east of the site. Potential for grass snakes and moths was also identified (see the full Preliminary Ecological Appraisal for details).

Although the Appraisal has found that the potential for the presence of protected species on the Site, recommendations including further investigation have been suggested in order to minimise any associated adverse impact of development on the protected species.

Precise development mitigation and compensation requirements will be dependent on design detail and the results of ongoing ecological survey work.

Mitigation measures suggested are listed below.

- Existing trees and boundary hedgerows should be retained, protected and enhanced, where feasible.
- Consider opportunities for incorporating ecological enhancements alongside proposed drainage, access and landscape design provisions.
- Artificial lighting should be avoided / minimised in proximity to retained boundary habitats, particularly with respect to the watercourse along the eastern boundary, and any other proposed green corridors, in order to minimise disturbance to bats and other nocturnal species.
- Incorporate bat and bird boxes into new buildings.

In conclusion, the site is not considered to be highly ecologically sensitive and has similar characteristics to other greenfield sites. With appropriate mitigation as suggested above, development of the site can be carried out without any adverse ecological impacts.

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

Included in the Preliminary Ecological Appraisal is a Biodiversity Net Gain Assessment, a calculation that compares the ecological value of pre-development habitats with proposed post-development habitats.

The site has a total pre-development biodiversity value of 59.90, once developed the biodiversity value of the site will increase to 65.41. This provisional assessment based on the proposed layout returns an overall potential net gain of + 5.51 habitat units. While this will be further refined via the detailed soft landscaping proposals for the development, it indicates that the development is capable of delivering considerable biodiversity net gain.

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

The south-east area of the Site is designated as a Bedford to Milton Keynes Marston Vale, Green Infrastructure Opportunity Zone. The opportunity zones reflect those areas in the Borough where there is the greatest potential to maintain and enhance the multi-functional nature of green infrastructure across the five themes of landscape, historic environment, biodiversity, accessible green space and access routes. The Site provides the opportunity to expand the regenerated woodlands of Buttons Ramsey immediately adjacent to the west of the site and to enhance the long distance walking and cycling route of the John Bunyan Trail which passes directly through the north-western corner of the Site.

4a. Likely to impact on designated or non-designated heritage assets or their settings?

This submission is supported by a Heritage Appraisal carried out by JB Heritage Consulting Ltd. As part of this appraisal, the Historic England Methodology has been followed in order to maximise enhancement and avoid harm to heritage assets.

The appraisal identifies that 8 of the 10 Listed Buildings are located to the north and north-east of the site, with the remaining 2 located to the south and south-west. A Certificate of Immunity Asset is also located to the north-east of the site. The appraisal has, however, only identified 3 listed buildings as being at potential risk of experiencing an impact as a result of the potential development of the Site. These are summarised as:

Kempston House, NHLE 1114285, Grade II

The setting of Kempston House has limited prominence and visual interaction with the land beyond its boundary, it is therefore less sensitive to development outside of its curtilage. It is proposed that an area of open green space along the northern edge between Kempston House and the Site will be retained. This will sustain an area of open space, maintaining an understanding and appreciation of the listed building. In order to maintain the rural character of Home Road, development will be located behind landscaping, reducing impacts associated with the built form.

It is concluded that whilst there will be a change to the character of the wider setting, taking into account the proposed offset, the private nature of its immediate setting and the mitigation measures along the site boundaries, the impact on its setting can be significantly reduced with potential for this to be avoided altogether through the detailed design stages.

Ramsay Cottage, NHLE 1321547, Grade II

As an agricultural labourer's dwelling, Ramsay Cottage has a special appreciation in the character of the area. In order to preserve this character, open space to the north

of the site boundary will be maintained, sustaining an experience of the asset in a rural setting. Therefore, the development can be accommodated with minimal impacts on the landscape setting and character.

The Cottage, Kempston House, NHLE 1114284, Grade II

In order to preserve the rural setting, the parcel of land south of The Cottage and to the west of the plant nursery is proposed to be retained as open space. The retention of a green, open space spanning across both the eastern and western sides of Home Road will combine to create a landscape buffer to mitigate impacts of development. With the proposed mitigation, any adverse impacts on the special interest of the area will be minimised, and reduced to a low level of less than substantial harm.

Considering the proposed mitigation recommended above and included in the concept plan contained within the Ramsey Green Vision Document the Heritage Appraisal demonstrates that appropriate mitigation measures are capable of minimising any harm to the setting of nearby heritage assets.

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

The provision of new housing, both market and affordable in a sustainable location near the Bedford urban area will support economic growth in the area.

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

None proposed.

8b. Within the existing settlement form?

The site adjoins a defined settlement policy area. The proposed site adjoins the existing small settlement of Gibraltar Corner which is located in-between the larger settlements of Kempston and Wootton. The site is close enough to the Bedford urban area and service centres to allow active travel modes and the use of public transport to be a realistic alternative to private motor vehicles.

9a. On previously developed land?

The site is not previously developed land as defined in the NPPF, however, for the new local plan to deliver its housing requirements greenfield sites will have to be allocated.

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

The site is on land classified as Grade 3, Good to Moderate, it does not fall with the higher grades of 1 or 2. Again as referred to above, for the new local plan to deliver its housing requirements greenfield sites will have to be allocated and the majority of the agricultural land within the Bedford Borough area is Grade 2 or 3.

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), and not located within proximity to an area prone to flooding.

15e. Connect highway without constraint?

In support of this representation a High Level Transport Strategy has been prepared by Stantec to provide additional detail of the transport and access elements of the site proposal.

In summary, the Site benefits from good connectivity to Bedford, Kempston and Wootton, by foot, bicycle and public transport. At present, the site is accessed off Home Road and Wood End Lane. Home Road is a single carriageway road with no segregated footway or cycleway along the site frontage, however, as part of the development proposals one can be provided.

To provide safe and accessible access to the Site, two T-junctions are proposed on Home Road and a single T-junction on Wood End Lane, these would form the primary vehicular, pedestrian and cycle access to the site. Further to this, the proposal seeks to construct 2m wide footways with informal pedestrian crossings to link the development with existing footways in order to provide pedestrian access, public transport opportunities and local amenities. The junctions will be developed further at the design stage. In line with the comments submitted by Bedford Borough Council Highways, a pedestrian / cycle only access is proposed off Ibbet Close.

15f. Highway or junction capacity issues

As set out in the accompanying Transport Strategy, development of the site would increase vehicle trips in Home Road, Green End Road and Ridge Road and a transport assessment may be required. However, the emphasis of the transport strategy is to reduce the need to travel, before then prioritising non-car modes of travel, focussing on opportunities for access by walking, cycling and public transport. The development offers good opportunities to enhance the pedestrian and cycle accessibility of the site, through footway improvements along Wood End Lane and Home Road to connect with the existing footway network in Gibraltar Corner and link with National Cycle Route 51 and the Bedford Green Wheel cycle route via Ridge Road. These improvements will mean the centre of Bedford will be within a reasonable five mile cycle ride of the site via high quality cycle infrastructure, and local pedestrian accessibility will enhance walking connections with Gibraltar Corner and the existing bus stops along Ridge Road. It is not considered that there are any nearby junction capacity issues which cannot be appropriately mitigated.

With the implementation of the strategy set out in the Transport Strategy, it is considered that the site is deliverable, the proposal positively contributes to the character of the existing settlement and accords with national and local transport policy guidance.

Summary

- 4.5 Following the above re-valuation of the Site, taking into account the additional evidence submitted along with this representation, it is considered that the original ranking should be amended as set out below. As is evident from this reassessment, the site scores extremely well with the only negative score being that it is not a brownfield site. As referred to above, for the new local plan to meet its housing requirements greenfield sites will have to be allocated. The Site at Gibraltar Corner is in a highly sustainable location, it is available, deliverable and developable and as such would make an ideal location for a housing allocation in the emerging plan.

Ranking of Site 1333		
Bedford Borough Ranking		Proposed Updated Ranking
Site Selection Criteria	Ranking	Ranking
1a. Within or adjoining UAB SPA or built form of a small settlement?	?	++
1e. Outside, adjoining or within the air quality management area?	+	+
2a. Within or adjoining site of nature conservation importance?	+	++
2b. In an area where protected species are known or likely to exist?	xx	0
2c. Potentially able to achieve a net gain in biodiversity?	?	++
2d. Able to link into the green infrastructure opportunity network?	N/A	++
3a. Proposing a renewable energy scheme or extra energy efficient standards chosen?	N/A	N/A
4a. Likely to impact on designated or non-	x	0

designated heritage assets or their settings?		
5a. Likely to increase future economic and employment opportunities?	N/A	+
6a. Proposing a main town centre use in, on the edge or outside of a town centre?	N/A	N/A
8b. Within the existing settlement form?	+	+
9a. On previously developed land?	x	x
9b. On best and most versatile agricultural land ie grades, 1, 2 or 3a?	?	0
10a. Within a groundwater source protection zone?	+	+
11a. At risk of flooding?	+	++
15e. Connect highway without constraint?	+	++
15f. Highway or junction capacity issues?	?	++

Measurement	Existing Ranking	Proposed Ranking
?	3	0
+	6	4
++	0	7
x	2	1
xx	1	0
0	0	3