



Martin Grant Homes

Regulation 19 Bedford Local Plan 2040: Public Consultation

Martin Grant Homes – Representations Draft for Comment

i-Transport Ref: SAW/VP/ITL17310-003

Date: 28 July 2022

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Executive Summary

- 1.1.1 MGH is keen to engage positively with Bedford Borough Council to ensure that specific allocations within the Plan are justified and evidenced appropriately, particularly the new allocation **Policy HOU19** which has been introduced for at least 4,000 new dwellings and 4ha of employment land at Little Barford, located in the east of the borough and close to the border with South Cambridgeshire.
- 1.1.2 The transport impact assessment supporting any allocation of land at Lower Barford (identified in **Policy DS5(S) Distribution of growth**) must be properly and robustly prepared to ensure that the transport impacts of the proposed allocation are considered both without and with East West Rail, mindful that the status of EWR is not certain. Similarly, the transport mitigation for the proposed allocation must be considered both without and with EWR in addition to a robust assessment of cross border transport impacts further east into South Cambridgeshire and particularly along the A428 corridor. It is not clear that this detail has been provided to evidence the proposed allocation at this stage.
- 1.1.3 Thus, MGH considers the allocation of land at Little Barford premature. However, MGH notes that the need for an SPD is identified within **Policy HOU19** and support this requirement. It will be important for the Council to consult appropriately on that SPD at the relevant time.

SECTION 1 Introduction

- 1.1 These representations are made on behalf of Martin Grant Homes. MGH is promoting a residentially led, mixed use development on land to the north of Cambourne which sits east of the jurisdiction of Bedford Borough.
- 1.2 The remainder of the document sets out the background to MGH's representations.

SECTION 2 Representations

2.1 Regulation 19 Bedford Local Plan 2040 Consultation Draft

2.1.1 The Regulation 19 Bedford Local Plan 2040 Consultation Draft, referred to herein as 'the Plan' supports the Government's wider aspirations for the Oxford to Cambridge Arc set out in 'The Oxford-Cambridge Arc Government ambition and joint declaration between Government and local partners' (2019) and Planning for sustainable growth in the Oxford – Cambridge Arc: an introduction to the spatial framework' (2021) and is designed to align with the wider strategic objectives for development of both housing and employment sites, with supporting infrastructure, across the arc. The Plan gives significant weight to delivery of East West Rail (EWR) and specifically a new station on land between Sandy and St Neots. This is welcomed and MGH supports these wider strategic objectives and infrastructure delivery.

2.1.2 The Plan is clear that new development will be focussed ***'firstly on brownfield sites within the urban area and town centre regeneration opportunities. In addition, sites beyond, but close to, the urban area will give the opportunity for gains in green infrastructure. The completion of EWR will result in the creation of highly accessible locations around new rail stations. By concentrating on accessible locations, the spatial strategy aims to minimise the need to travel by car and therefore reduce the emission of carbon dioxide in line with the objectives of the plan'***. It then goes on to clarify three growth locations:

- ***'A. Within the urban area***
- ***B. At strategic locations adjacent to the urban area which contribute to the delivery of key green infrastructure projects***
- ***C. At new growth locations focussed on the EWR / A421 transport corridor with the potential for rail based growth, particularly in the south of Bedford area and at a new settlement at Little Barford'***

2.1.3 MGH supports these principles of prioritising brownfield sites and sites adjacent to existing urban areas before sites around transport corridors and new transport infrastructure and supports **Policy DS2(S) of the Spatial strategy**.

2.1.4 MGH also supports the Council's ambition to establish Bedford as a place for innovation with an enhanced academic presence and new business / science parks. The Council links this ambition to an increased attractiveness of locations served by the new rail stations, citing these as ***'essential in giving impetus to the housing market and housing delivery'***. However, the Council notes in the Plan that these economic drivers, linked as they are to the delivery of EWR, will take time to impact on in-migration and housing demand.

- 2.1.5 The Infrastructure Delivery Plan (IDP) similarly identifies the potential of EWR to offer improved connectivity and create economic growth and references this critical catalyst for delivery as being pivotal to achieving the Plan's vision. The IDP notes that the new links and stations will not be operational until 2030 and other essential infrastructure (principally improvements to the A421) are expected to be delivered on similar timescales.
- 2.1.6 Thus, the Plan focuses on the fact that delivery of EWR and the new station in the east of Bedford Borough will unlock new development in this area i.e. the proposed allocation of some 4,000 dwellings and 4ha of employment land at Little Barford. However, the Plan focuses on 2030 as the year for delivery of EWR which seems very ambitious given the project is still in its early stages and does not yet have a defined delivery timescale. MGH considers it unlikely that EWR will be operational eight years from now and the timeframe is more likely to be later. Therefore, it is extremely important that the Transport Strategy which underpins this Local Plan work for the interim period before EWR, and indeed other planned infrastructure improvements, comes forward.
- 2.1.7 Where **Policy DS2(S)** of the Spatial strategy focuses on growth locations on the East West Rail / A421 transport corridor it specifically references '**x. A new settlement and related employment provision at Little Barford well connected to the new East-West Rail station at its intersection with the East Coast Main Line**'.

HOU19 Little Barford

- 2.1.8 The introduction of a proposed allocation (**Policy HOU19**) at Little Barford is new and has been introduced since the Draft Local Plan issued for consultation in early 2021.
- 2.1.9 The proposed new allocation at Little Barford is identified for at least 4,000 dwellings and 4ha of employment land. The Plan outlines the intention for the first phases of development to be accessed west of the East Coast Mainline railway and for later stages to be accessed via the new alignment of the A428 (following completion of the Black Cat to Caxton Gibbet improvement works).
- 2.1.10 The Housing and Employment Land Availability Assessment and Site Assessment (May 2022), Appendix 5, Part 2 New Settlements and Additional Site Assessments sets out specific details regarding the proposed allocation of land at Little Barford (HOU19).
- 2.1.11 This report notes that the Council's Highways Team advises that '**widening of Barford Road and new junctions would be required for access, including widening of the existing footway and conversion to cycle/pedestrian route up to the A428**'. MGH supports this.

- 2.1.12 The report further notes that no information is provided by the promoter on traffic generation. MGH views this as a fundamental part of assessing the impact of any development proposal on the highway network and consider this information as vital to ensuring the suitability and sustainability of the allocation. The absence of this information suggests the proposed allocation is premature.
- 2.1.13 MGH notes that the report includes National Highways comment that **'the site will have significant impacts on the strategic road network and considers that a well-integrated and significant sustainable transport provision is essential to ensure that this relatively isolated development does not become overly reliant on car use'**. Again, MGH supports this key position from National Highways and questions how the allocation can be supported over and above alternatives by Bedford Council, if no traffic generation information has been provided by the promoter. In a scenario where EWR does not come forward in the planned timeframe, given as 2030 in this Plan, or indeed does not come forward at all, this issue becomes a greater concern and must be addressed in any justification of site allocation.
- 2.1.14 MGH notes that the Council states that their consultant AECOM advise that, **'with a number of assumed mitigation measures, an analysis of key junctions in the borough suggests that there is remaining capacity at these locations which could accommodate an increase in traffic which may be generated by the proposed development'**. Strategic modelling may indicate this, but the IDP appears to suggest that a new A421 junction (to provide access to the new EWR station(s) and potential Little Barford development) with works to a value of some £50m is not included within the BBTM Strategic Traffic Model. The IDP further notes a funding gap of over £200m identified for highway improvements schemes that are within the model. Detailed analysis should be included in support of any allocation and given the costs and uncertainty of highway improvements considered necessary to make an allocation at Little Barford acceptable in transport terms, the allocation is considered premature.

2.1.15 The New Settlements and Additional Site Assessments report does acknowledge the proximity of the potential new EWR station to the proposed allocation and notes that this ***'will significantly reduce the highway impact of the development, however delivery is not expected before 2030. The existing bus service through Little Barford is a very limited service and would need considerable improvement, including links to the planned new rail station. Pedestrian and cycle connections to the station and St Neots would also be essential'***. MGH agrees with this and there is a clear need for the transport aspects of the development prior to EWR to be properly considered, not least because the timescales on delivery of EWR, or indeed its delivery at all, are unclear at the present time. This is fundamental to determining the acceptability of an allocation at Little Barford.

2.1.16 A further aspect of any large-scale development allocation in this location will be the need to properly consider cross border transport impacts since the traffic generation of an employment and housing allocation of this size will result in traffic generation further east and across the border into South Cambridgeshire. MGH stresses the importance of this work being undertaken to establish the impact of the scheme further east on the A428 it is not clear from the Transport Strategy or modelling work that underpins it that this has been assessed. Furthermore, this cross-border assessment will need to properly and thoroughly reflect the scenario both with and without EWR.

2.1.17 In addition to the above, MGH also raises concern that nine out of the fifteen key sustainability objectives for the Little Barford allocation return negative or uncertain classifications including:

- **Negative:**
 - Improving air quality;
 - Reducing emissions and carbon dioxide;
 - Conserve, sustain and enhance the historic environment;
 - Maximise development on previously developed land and avoid the loss of high-quality agricultural land; and
 - Reduce the need to travel and promote sustainable modes of transport.
- **Uncertain:**
 - Protect, maintain and enhance biodiversity and habitats.
 - Promote vital and viable town centres.

- Protect and enhance landscape and townscape character and the sense of place in settlements
- Minimise flood risk.

2.1.18 Thus, just six of the fifteen objectives, less than half, return a positive outcome. The site appraisal focuses on delivery of EWR and the new station to alleviate the negative issues relating to air quality, emissions and promoting sustainable travel but as referenced earlier, this is entirely reliant on EWR coming forward and in an appropriate timeframe. MGH stresses that any allocation at Little Barford must demonstrate that it can come forward without or with EWR and must appropriately and robustly demonstrate that the transport impacts of the scheme, and any sustainable transport strategy underpinning the scheme, can function both with and without EWR.

2.1.19 Policy HOU19 states that a ***'strategic masterplan and design code is to be prepared by the Council in conjunction with the landowners, stakeholders and local community and adopted as a Supplementary Planning Document. This document will need to be produced ahead of the submission of any planning application and will demonstrate how the new settlement will deliver the policy principles below and will include (in respect of transport):***

- ***A transport and movement strategy including infrastructure needs and the relationship to East West Rail;***
- ***A phasing strategy to ensure that infrastructure investment is provided in tandem with or ahead of the development it supports; and***
- ***An infrastructure delivery plan setting out the timing, funding, and provision of green, social, and physical infrastructure, including schools, community facilities and local centres in tandem with housing development'.***

2.1.20 MGH welcomes development of this SPD and request that this fully considers the transport implications of development of this quantum in this location and includes scenarios that cater for EWR not coming forward at all or being delivered on a protracted timescale.

2.1.21 In summary, MGH considers the allocation of land at Little Barford premature given the lack of information available in evidence to this Regulation 19 Local Plan. However, it is noted that the need for an SPD is identified within **Policy HOU19** and MGH support this need. It will be important for the Council to consult appropriately on that SPD at the relevant time.

SECTION 3 Conclusions

- 3.1.1 MGH is grateful for the opportunity to respond to the Bedford Local Plan and wishes to engage constructively in the context of their own development interests to the east of Bedford Borough, at Cambourne in South Cambridgeshire. MGH supports the overarching principles set out by Bedford Council of prioritising brownfield sites and sites adjacent to existing urban areas before sites around transport corridors and new transport infrastructure and support **Policy DS2(S) of the Spatial strategy**.
- 3.1.2 MGH also supports the Council's ambition to establish Bedford as a place for innovation with an enhanced academic presence and new business / science parks.
- 3.1.3 MGH agrees with the Council's own conclusion that any allocation at Little Barford must be robustly assessed and agree with National Highway's conclusion that development in this location is likely to have a significant impact on the Strategic Road Network. There is a clear need for the transport aspects of the allocation prior to EWR, and indeed with no EWR, to be properly considered, not least because the timescales on delivery of EWR, or indeed its delivery at all are unclear at the present time.
- 3.1.4 A further aspect of any large-scale development allocation in this location will be the need to properly consider cross border transport impacts since the traffic generation of an employment and housing allocation of this size will result in traffic generation further east and across the border into South Cambridgeshire. MGH stresses the importance of this work being undertaken to establish the impact of the scheme further east on the A428 corridor, and this work should be completed prior to the allocation being adopted.
- 3.1.5 In conclusion, MGH does not object to the principle of development at Little Barford but has concerns currently that the evidence base to underpin the identified allocation at **Policy HOU19** is lacking. There is a need to demonstrate that any allocation in this location can come forward without or with EWR and the supporting evidence must appropriately and robustly demonstrate that the transport impact of an allocation here, and any sustainable transport strategy underpinning it, can function both without and with EWR and not to the detriment of the A428 corridor further east.
- 3.1.6 This Regulation 19 Plan does not provide this detailed information at this stage and thus, MGH considers the allocation of land at Little Barford premature. However, MGH notes that the need for an SPD is identified within Policy HOU19 and support this need. It will be important for the Council to consult appropriately on that SPD at the relevant time.

