

Celebrating
60
years

**Representations on behalf
of Prologis UK Ltd:
Submission Draft
Bedford Local Plan
2040**

July 2022

LICHFIELDS

LICHFIELDS

Lichfields is the pre-eminent planning and development consultancy in the UK

**Celebrating 60 years
of innovation in planning.**

lichfields.uk

© 2022 Nathaniel Lichfield & Partners Limited (trading as "Lichfields"), All Rights Reserved, is registered in England, no. 2778116.

Registered office at The Minster Building, 21 Mincing Lane, London EC3R 7AG.

Formatted for double sided printing.

Plans based upon Ordnance Survey mapping with the permission of Her Majesty's Stationery Office.

© Crown Copyright reserved. Licence number 10007707

[OurRef]

[25661918v225654391v225654391v121252777v1](#)

Contents

1.0	Introduction	1
	Overview of Report	1
	Duty to Cooperate	2
2.0	Review of the Strategic Policies within the SDBLP	6
	Vision and Objectives	6
	Theme 3: More Prosperous	7
	Policy DS1(S) Resources and Climate Change	10
	Policy DS2(S) Spatial Strategy	13
	Policy DS4(S) Amount of Employment Growth	15
	Policy DS5(S) Distribution of Growth	19
	Policy HOU19 Little Barford New Settlement	22
	Policy EMP6 Business Park, Land at Water End and St Neots Road	23
	Policy DM7 Environmental Net Gain	25
	Policy DM8 New employment development in the countryside	26

1.0 Introduction

Overview of Report

- 1.1 These Representations have been prepared by Lichfields on behalf of Prologis UK Limited ('Prologis'), in response to the Submission Draft Bedford Local Plan 2040 [SDBLP], published for consultation in June 2022. They are made in the context of Prologis's development interests at land to the West of the A1, Wyboston. This location is currently unallocated 'white land' and is being promoted by Prologis for a high-quality, flagship, mixed-use employment development with an emphasis on life science manufacturing and modern logistics development.
- 1.2 This report should be read in conjunction with a separate site-specific representation which promotes the strategic development of the Wyboston site, seeking its allocation within the emerging Local Plan for employment uses. It should also be read alongside a separate Employment Land Technical Note, which analyses the need for employment land in Bedford Borough in detail.
- 1.3 Section 20(5) of the Planning and Compulsory Purchase Act 2004 requires that all development plan documents must be submitted for independent examination to assess whether they are "sound". Further to this, Section 19 of the 2004 Act requires local planning authorities to have regard to various matters, including national policies, such as those set out in the National Planning Policy Framework [NPPF], alongside other advice contained in guidance issued by the Secretary of State.
- 1.4 There is no statutory definition of soundness; however, paragraph 182 of the NPPF states that to be sound, a Local Plan should be:
- 1 **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;
 - 2 **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - 3 **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,
 - 4 **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, where relevant.
- 1.5 In addition, the NPPF¹ states that:
- "Plans and decisions should apply a presumption in favour of sustainable development.*
- For plan-making this means that:*
- a *all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve*

¹ NPPF (July 2021), paragraph 11

the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;

- b *Strategic policies should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
 - i *The application of policies in this Framework that protect areas of assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
 - ii *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”**

1.6 This report demonstrates that several policies within the emerging SDBLP require amendments in order to meet the tests of soundness as set out in the NPPF. For the reasons set out below, Prologis considers that the SDBLP is not positively prepared, justified, or effective, and fails to comply with national policy in a number of areas. Prologis seeks to work with Bedford Borough Council [BBC] in suggesting amendments to ensure the draft Plan is found sound at examination. Furthermore, as it currently stands, the Council has not met its Duty to Cooperate, and its Sustainability Appraisal is not sufficiently robust or robustly considered all reasonable alternatives.

1.7 Accompanying this report is Prologis’s Site-Specific representation which makes the case for the inclusion of Land West of A1, Wyboston within the emerging Plan. It focusses on the characteristics of the location and its development potential, explaining why it represents an appropriate addition to the Council’s allocated employment portfolio of sites. Reference is made to its potential to become a new focus for the important life-science manufacturing sector and modern logistics, highlighting the results of economic analysis that demonstrates both a clear need for the allocation, and the benefits of bringing this site forward for development during the Plan period. There are very strong justifications for this site to be allocated in the SDBLP, which would go a considerable way towards addressing the Borough’s development needs in line with the Council’s Vision and Objectives and helping to ensure that the Plan is sound.

Duty to Cooperate

1.8 Paragraph 24 of the NPPF and S33a of the 2011 Localism Act require that Local Planning Authorities [LPAs] have a legal duty to cooperate with other LPAs and organisations to seek to address strategic planning matters that are likely to have an impact beyond their immediate Local Plan area. Furthermore, to ensure effective working on strategic matters throughout the preparation of Local Plans, Section 33A of the Planning and Compulsory Purchase Act 2004 says that authorities have a duty “...to engage constructively, actively and on an ongoing basis”.

1.9 This will involve the consideration of any social, environmental and economic issues, including the impact that major site allocations, that can only be addressed effectively by working with other LPAs and organisations beyond their own administrative boundaries.

- 1.10 The SDBLP's evidence base includes the *Duty to Cooperate Position Statements* (April 2022) document. With regard to the allocation of sites, the Position Statement says that:
- “At the current stage of plan preparation, which is the publication of the Plan for Submission for consultation, our neighbours and partners are yet to have sight of the detail contained in the plan’s policies and they do not know which sites are proposed for allocation.”* (page 5 Section 3.0).
- 1.11 This assertion is surprising, given that the SDBLP allocates several large new settlements and employment sites on the edge of the Borough, including those at Little Barford (HOU 14), South of Bedford (Kempston Hardwick, HOU 19), and EMP6 (Business Park, Land at Water End and St Neots Road). Given the scale of these allocations, these will have a significant impact across the wider area, that are likely to give rise to cross-boundary issues that must be worked out and agreed with neighbouring authorities in order to meet the legal requirements set out in the Localism Act 2011 and Planning and Compulsory Purchase Act 2004.
- 1.12 It is not clear whether the authorities affected by these sites, most notably Huntingdonshire and Central Bedfordshire, have effectively worked with BBC to identify any potential impacts and mitigate any concerns through the representation process or whether they have come to an alternative agreement with BBC as to how these should be mitigated. If this engagement has occurred, the Duty to Cooperate Position Statement does not provide the necessary level of detail of these arrangements, nor how any potential impacts from these sites may be managed in agreement with neighbours.
- 1.13 The Council has stated that its needs for strategic B8 land can be met entirely within neighbouring authorities. As referenced in its Employment Land Study Part 1 (May 2022):
- “Although warehousing sites will be required in the borough to meet local needs and ‘final mile’ distribution, as set out above, any requirements for regional or national distribution centre warehousing in the foreseeable future are likely to be catered for by the extensive allocations for large-scale strategic warehousing that have been made in nearby local authorities.”* [BELS Part 1, paragraph 9.13]
- 1.14 There is no evidence in the Duty to Cooperate documentation that suitable conversations have taken place with neighbouring authorities or that formal agreements have been made with any neighbouring authorities, to ensure that the Borough's strategic logistics needs have been met. We acknowledge that it is not a duty to agree, but BBC does not appear to have undertaken the basics that are required and until then we are of the view that the Plan cannot proceed.
- 1.15 Furthermore, regarding employment provision, all neighbouring authorities have stated that they may (or will) require further engagement with the Council². For example, Central Bedfordshire Council is quoted by BBC as stating that its officers *“have not yet been sighted on the pre-submission plan being put forward by Bedford Borough Council and so are not aware of the sites being proposed”* [page 7]
- 1.16 As it currently stands, we are concerned that as the Bedford Council may not have complied with the Duty to Cooperate, and therefore that in its current form, the Plan is unsound.

² P6, Local Plan 2040 - Duty to Cooperate Position Statements

There is no clear evidence that the Borough has sought to work with neighbouring authorities in regard to any cross-boundary issues that may result from the allocation of certain employment sites within the Plan.

1.17 **To remedy this issue and to make the Plan sound, Prologis considers that the Council should delay the final submission of its Plan until it can suitably evidence that the Duty to Cooperate requirement has been adequately met with neighbouring authorities.**

1.18 Given that the DtC Position Statement suggests that engagement is ‘ongoing’, Prologis reserves the right to make further comments at the examination as further information is released by the Council. We also request that the Council produces further evidence to demonstrate they have consulted appropriately with its neighbours and other relevant bodies, and the outcome of those discussions that were programmed post submission.

Sustainability Appraisal

1.19 Prologis considers that the Sustainability Appraisal [SA] for the Bedford Local Plan 2040 is not robust. The SA evaluates the social, economic, and environmental impacts of the strategies and policies in a Local Plan, to understand the extent that these align with the Government’s sustainable development objectives. This should ensure that the plan is based on a sound evidence base, helping ensure that the plan is positively prepared and justified.

1.20 While Prologis welcomes the preparation of the SA, it is concerned that the Council has not properly considered the impact of its spatial strategy within this appraisal. The SDBLP’s spatial strategy focuses a significant amount of growth in the Borough towards the A1/A421 corridor, with the inclusion of potential new settlements including at Little Barford.

1.21 We consider that the impact of these strategic development sites has not been properly accounted for when assessing whether the Plan will be effective in delivering sustainable development.

1.22 Furthermore, the PPG requires that sustainability appraisals of Local Plans “*need to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted.*”³

1.23 The PPG clarifies that reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.

1.24 Prologis considers that BBC has not considered all reasonable alternatives to growth in the emerging Plan. Based on our own assessment of the actual level of employment need, a much higher level of growth should have been considered within the SA. Paragraph 9.3 of the SA states that “*three levels of employment land growth are assessed in paragraphs 8.5 and 8.6 based on varying assumptions about the density of development and the*

³ PPG Reference ID: 11-018-20140306

proportion of growth within employment sectors. The Council's preferred option is the middle level of employment land growth (142 ha)".

- 1.25 We agree it is right to consider various different growth scenarios; however, these three options (for 90ha, 142 ha – the preferred option – and 206 ha of employment land) do not reflect the actual need for employment land in the Borough that the Local Plan should make provision for. On the basis of the detailed Employment Land Technical Paper that accompanies these representations, Prologis considers that the ‘true’ level of employment land needed in the Borough is between 166 ha and 226 ha at the very least, and potentially very significantly more once the need for strategic B8 is factored into the equation. Without considering a realistic set of growth scenarios for the Borough, it is not possible to attain a robust understanding of the environmental impacts that these broad development locations may have on issues, such as the level of economic growth, carbon emissions, and the impact on the local and regional transport network.
- 1.26 As it currently stands, the yet to be published SEMLEP *Strategic Employment Land Requirements* study, which is identifying the need for additional strategic logistics floorspace across the wider sub-region, is likely to identify significant additional need for logistics which may or may not be located in Bedford Borough. The implications of this study, which could generate a level of need over and above that identified by the Council’s own Employment Land Study (May 2022), should have been considered as part of the Plan’s evidence base and will need to be considered in a future update to the SA. An additional, ‘worst case’ scenario in excess of the 206 ha of employment land should have been modelled as a reasonable alternative in the SA.
- 1.27 Prologis also considers that the Land West of A1, Wyboston site [site 951 in the SA] should perform well against the criteria used to assess the sustainability of site allocations, as set out in the Sustainability Framework in Annexe 1 of the SA. While the SA states that “*the location [of site 951] is not consistent with the council’s preferred strategy*”, the details of the Council’s appraisal are not available within the SA, so it is unclear on what basis this decision was reached.
- 1.28 As such, Prologis consider that the SA is not robust. Prologis reserves the right to make further comments on the document leading into the Examination.

2.0 **Review of the Strategic Policies within the SDBLP**

2.1 This section of the Representations focuses on the strategic policies within the Submission Draft Bedford Local Plan 2040 (hereon referred to as the draft Plan / SDBLP) relating to employment land and the distribution of this across the Borough. We also consider those policies relating to climate change and environmental improvements, and employment land in the countryside. We consider the compliance of these policies against the tests of soundness set out in national policy, recommending changes to the wording of these where necessary.

Vision and Objectives

2.2 The purpose of the Plan's Vision and Objectives is to provide focus and direction for the more detailed strategic policies within the remainder of the document. The Vision envisages the Borough becoming a *“greener, more sustainable, more attractive and prosperous place to live and work. Tackling climate change and adapting to and mitigating its effects will be at the heart of new development throughout the borough”*.

2.3 This sets out what sustainable development will look like in the Borough and the broad areas which are expected to see significant growth, such as the new settlements of Little Barford and Kempston Hardwick. Regarding employment, the Vision seeks to deliver high quality commercial and office spaces in the Borough, which will seek to attract high-tech sectors. This will be supported through improvements to local infrastructure and transport connectivity.

Consideration of vision and objectives

2.4 Prologis considers that the overall Vision and Objectives of the Plan could help direct an ambitious but deliverable programme of growth for the area, building on the Borough's excellent locational strengths and opportunities. However, we consider that the Vision could be enhanced by making explicit reference to key existing sectors in the local economy, such as logistics, as well as those emerging industries which it wishes to encourage.

2.5 Supporting the growth of the local economy will be crucial to ensuring future prosperity of the area. It is positive that the vision and objectives seek to build upon its existing locational strengths. Bedford's location at the very heart of the 'golden triangle' for strategic distribution, while also being situated at the core of the Oxford-Cambridge Arc, ensures there are significant opportunities for the area, particularly in areas such as logistics and high-tech manufacturing that are naturally attracted to it. These sectors have expanded rapidly in recent years, and the Council should embrace this opportunity, supporting the delivery of additional high-quality employment space to aid this growth.

2.6 The Government recognises the critical important that strategic logistics already plays to UK Plc in the NPPF and more specifically, in its recent ***Future of Freight: a long term plan*** (June 2022). This document recognises that freight and logistics has a key role to play in the delivery of a number of public policy outcomes. The sector can make a significant contribution to levelling up and strengthening the union as a geographically distributed employer supporting economic activity across the UK. As such, the Future of

Freight document identifies as a key goal the need for a planning system which fully recognises the needs of the freight and logistics sector now and in the future and empowers the relevant planning authority to plan for those needs. This must also be recognised by BBC in its emerging Plan.

- 2.7 Furthermore, as set out in our accompanying Employment Land Technical Report, the latest Experian job growth forecasts for Bedford Borough indicate that the logistics sector will be one of the key drivers of growth over the Plan period. The Land Transport, Storage & Post sector is forecast to increase by 1,500 jobs over the 20-year Plan period, whilst the Wholesale sector is also forecast to increase, by 400 jobs. Appropriate allocations for modern strategic warehousing are therefore needed in the Borough to meet this need.
- 2.8 The NPPF requires plans to promote a sustainable pattern of development that is capable of meeting the development needs of their area and aligning growth and infrastructure. The vision of the draft Plan is right to recognise that planned transport improvements in the area will bring further improvements in connectivity, strengthening the existing agglomeration effects of the high value sectors in the wider area. The success of this will depend on ensuring there is sufficient employment land allocated in the parts of the Borough that are in close proximity to these infrastructure improvements.

Tests of Soundness

- 2.9 The Vision and Objectives represent a high-level statement of ambition rather than a policy which development proposals will be judged against. That said, Prologis considers that this part of the Plan fails to meet the following tests of soundness because it is not:
- 1 **Positively prepared:** The Plan's Vision and Objectives fail to recognise the importance of the logistics and distribution sector to the local and regional economy. There is strong evidence that future there will be strong demand for land for these uses in the future, which will be integral to delivering economic growth of the area.

Recommended Changes

- 2.10 The Vision and Objectives of the Local Plan should make explicit reference to the logistics and life science sectors, recognising the role that will play in delivering economic prosperity to the area, as a direct employer to the local population, as well as its complimentary role in supporting other high value uses in production and manufacturing.

Theme 3: More Prosperous

- 2.11 Theme 3 is one of four Themes which underpins the Vision of the draft Plan and relates to the economic prosperity and well-being of the area. This theme is underpinned by five objectives. These provide further detail on the economic aspirations of the Plan, with a focus on the types of employment and industry the Council seeks to promote; the conditions which will help attract these businesses; and the skills, education and training that will support these.
- 2.12 Key to this is the strengthening of the higher-value clusters, particularly for those businesses and sectors which are involved in innovation and high-value industries. The

Plan aims for the Borough to become a “*location for innovative businesses, with a strategically important employment site as a local innovation hub*”. The Policy does not, however, mention the logistics sector which is a key pillar of the local and regional economy and recognised as such in the Government’s *Future of Freight* plan. The Plan seeks to allocate land in locations that will aid the delivery of these employment uses.

Consideration of Theme 3

- 2.13 Prologis welcomes the principle of Theme 3, although we suggest a minor revision to the wording of this policy to ensure that it can be found sound.
- 2.14 We support the principle focus on growing employment and the skills base in the local area; this will be crucial to the longer-term prosperity of the area and will be integral to delivering sustainable growth. The objectives which underpin Theme 3 correctly seek to take advantage of the Borough’s locational qualities, building upon the emerging high value sectors.
- 2.15 There is a high concentration of businesses and organisations in the wider sub-region, notably Cambridge and Milton Keynes, which focus on innovation, research and engineering, including universities and colleges, science parks, enterprise zones, and technology clusters. There has been consistent demand in the South-East Midlands (SEMLEP) area for high quality employment spaces to serve these industries. Enough land will need to be allocated in those locations that can best support the creation of these higher-value sectors, such as for advanced manufacturing, life sciences and the green economy.
- 2.16 The *Bedford Economic Growth Ambitions Topic Paper (2022)* highlights some of the economic advantages that the Borough has in comparison to its neighbours, such as the lower land-values in comparison to Cambridge, which means that Bedford Borough is well positioned to encourage inward investment for related uses in advanced manufacturing, particularly in the Life Sciences sector.
- 2.17 Higher-value uses have also created a knock-on demand for the latest generation of storage, distribution and related logistics uses. These sectors have also faced additional pressure from the growth of online retailing, which saw a rapid increase following the COVID-19 pandemic. This sector is expected to continue to grow in the years ahead, as demonstrated by the recent trends in B8 logistics completions in the Borough (as set out in BCC’s recent annual monitoring reports).
- 2.18 What the pandemic and shift towards e-commerce has shown is that for business to thrive (including many of the target sectors for BBC), a healthy logistics industry is imperative. Bedford Borough has a strong track record of delivering growth in the logistics sector. Going forward, it will be important to ensure that employment sites continue to be available to meet the ongoing strong demand - and need - for these uses.
- 2.19 Employment land should be able to attract a flexible mix of uses in order to encourage a greater diversity of employers to the area. Planning for a mixture of Use Class E(g), B2 and B8 uses would help the area to become more resilient to economic shocks, while providing flexibility for future occupants and site operators.

- 2.20 It is crucial that enough suitable employment land can be brought forward quickly in the locations that are most attractive to these higher value employers. Ensuring that the economy can quickly adapt will be crucial in reducing the number of residents commuting out of the area, especially to Cambridge City.
- 2.21 Prologis considers that the third objective under Theme 3 should be reworded to ensure that the Plan seeks to ‘Allocate **sufficient** land to provide locations for the delivery of high value jobs.’ It is vital that the amount of land allocated takes into account the objectively assessed needs of the area, to ensure the Plan is positively prepared and is effective in meeting its stated objectives. We consider that this theme would also benefit from recognising the role of the distribution and logistics sector, given the key role it plays in the wider economy.
- 2.22 Whilst the Theme supports the delivery of ‘emerging higher value’ clusters, we are concerned that the Council’s evidence base which underpins this objective, specifically BBC’s *Economic Growth Ambitions Topic Paper* (April 2022), suggests that land transport, and logistics in particular, is a ‘lower value’ sector with recruitment difficulties that should make it a lower priority going forward, particularly given the pipeline of strategic B8 sites coming forward in adjoining districts.
- 2.23 On the contrary, Prologis considers that the logistics industry can play a very significant role in ensuring the aims of Bedford’s high value economy can be achieved. The logistics sector is increasingly high value, both in terms of its productivity and also in the skills required for its employees, which is reflected in above-average wages for logistics employees and increasingly technology-focused skills.
- 2.24 Logistics activities also offer and indeed increasingly require, positions in managerial, administrative and high-tech occupations including electrical and mechanical engineering and IT roles. The sector has a well-earned reputation for investing substantially in its workforce, often upskilling staff towards engineering or managerial roles and offering apprenticeships.
- 2.25 The rise of e-commerce, warehouse robotics and automation in the logistics industry has created an increase in demand for electrical and mechanical engineers to be located on site:
“The sector is modernising and pushing technological boundaries to meet rising demand and supply challenges. This is driving a need for more employees to respond to increased technological efficiency as well as demand for skilled employees in electrical and mechanical engineering, IT and analytics”⁴.
- 2.26 This modernisation of processes and diversification of roles within the sector requires increasing levels of flexibility across a range of employment uses within large-scale logistics centres.
- 2.27 The logistics sector is therefore modernising and pushing technological boundaries to meet rising demand and supply challenges, and this is reflected in higher salaries and rapidly increasing productivity levels amongst employees that will generate real benefits across Bedford Borough.

⁴ BPF (2020): Delivering the Goods in 2020, Page 4

2.28 The status of logistics as a sector is also recognised within the NPPF. Paragraph 83 specially identifies the sector - as one of only three such sectors - where authorities are required to make provision for such development at suitably accessible locations. This Central Government support was reiterated in the recent *Future of Freight* report published by the Department of Transport (June 2022), which clearly establishes the Government’s positive attitude towards the role of logistics in the UK economy. With this comes a requirement for LPAs to ensure that the sector is appropriately accommodated with policy documents. The Local Plan should, as a consequence, cater for this need. Without explicit reference to land for logistics and distribution, the SDBLP will fail to plan sufficiently for this key sector of the local economy.

Tests of Soundness

2.29 Theme 3 sets out the economic objectives that the draft Plan’s policies seek to achieve. We consider that this part of the Plan fails to meet the following tests of soundness because it is not:

- 1 **Positively Prepared:** Theme 3 is not based on a strategy which fully builds upon the area’s long held strengths as a distribution location at the heart of the golden triangle and Oxford-Cambridge arc. The ‘high value’ jobs referred to in the text is not an accurate reflection of this position nor does the theme clearly identify the ongoing critical role of distribution.
- 2 **Effective:** The theme is not effective as it fails to clearly articulate the amount of land needed to deliver these high value jobs, with the wording left ambiguous.
- 3 **Consistent with National Policy:** The Theme makes no reference of the need to make suitable provision for storage and distribution operations at a variety of scales and in suitably accessible locations despite this being a requirement of paragraph 83 of the NPPF.

Recommended Changes

2.30 In order to address the conflicts identified above and ensure that Theme 3 is sound, it is requested that Bedford Borough Council reword the text to ensure that the Plan seeks to ‘Allocate **sufficient** land to provide locations for the delivery of high value jobs.’ Text should also be included under this theme to recognise the role of distribution and logistics sector, given the key role it plays in the economy before in facilitating the other high value sectors referred to in the text, and as a provider of good quality skilled employment in its own right.

Policy DS1(S) Resources and Climate Change

2.31 Policy DS1(S) sets out the Council’s policy requirements in relation to climate change and environmental conditions, encouraging a reduced reliance on non-renewables and improving natural capital. Policy DS1(S) sets out a range of requirements for new development which broadly fall under the following aims:

- minimising carbon emissions;

- maximising carbon storage and sequestration;
- mitigating and adapting to the impacts of climate change;
- Responding to the economic and policy changes that may accompany climate change;
- Responding to the economic and policy changes that are likely to accompany climate change; and,
- Requiring new development proposals to be accompanied by sustainability and Energy Statements.

Consideration of Policy DS1(S)

- 2.32 Prologis **broadly supports** the policy in principle though objects to the wording of the requirement in D(ii) which relates to the protection of ‘*high grade agricultural land.*’ We consider that the wording of this policy is inconsistent with national policy, as well as saved Policy 46S in the BLP 2030 to which it relates (see below).
- 2.33 The need to mitigate and plan for climate change is central to good planning and we agree that this should be a key consideration when determining planning decisions in the Bedford area. Prologis agrees that development should be situated in suitable locations, as this will help to play a key role in reducing carbon emissions. Prologis has a strong track record in environmental governance, setting a new benchmark for net zero carbon for logistics development in the UK. Through a process of innovation spanning over a decade, Prologis has helped further the development of net zero carbon logistics buildings in line with guidance published by the UK Green Building Council (UKGBC) in 2019 and meets the needs of customers and society. Recently, Prologis was awarded BREEAM Excellent for its Hub development at DIRFT. As such, we broadly support the policies DS1(S) A-C. These policies should help to ensure that new development is well connected and accessible by a range of modes of transport, along key transport routes.
- 2.34 Prologis also welcomes the fact that this policy seeks to encourage active travel. Development proposals that encourage the provision of high-quality walking and cycle infrastructure can play an effective role in discouraging car use and maximising opportunities for people to make trips by sustainable modes of transport.
- 2.35 It is also encouraging that subsection A) iii supports the provision of electric vehicle charging points in new developments where this is appropriate. This should help to encourage residents and visitors to the area to transition to low emission vehicles. Given this is a key growth sector, we support the flexibility of this policy given its relative infancy and the evolving standards for charging infrastructure.
- 2.36 Prologis **objects** to the text under DS1(S) D ii, however. This Policy seeks to ensure that development proposals respond to the economic and policy changes that are likely to accompany climate change, including by: “*Protecting high grade agricultural land (in accordance with Policy 46S).*”

2.37 In this regard, saved Policy 46S states:

“The Council will seek to maximise the delivery of development through the reuse of suitably located previously developed land provided that it is not of high environmental or biodiversity value. Where significant development is demonstrated to be necessary on agricultural land, poorer quality land should be used in preference to the best and most versatile agricultural land (grades 1-3a). Where the site is located on agricultural land outside of existing settlements, applicants will be required to provide evidence of the grade of agricultural land and, where that land is likely to be grade 3 or higher, undertake a detailed survey of land quality.”

2.38 The use of the phrasing “*high grade agricultural land*” is inconsistent with the wording used in national policy (paragraph 174b) which calls for the protection of the “*the best and most versatile agricultural land*”. This inconsistency in phrasing between national policy and saved Policy 46S introduces ambiguity into how the policy should be interpreted.

2.39 Given the need and ambition for housing and employment growth in the area and the limited supply of land in existing urban areas and on brownfield sites, there will be a need to allocate sites previously used for agricultural purposes.

2.40 The redevelopment of agricultural land in well-connected locations, with good access to local amenities, will play a crucial role in meeting the areas objectively assessed needs, in a sustainable way. In some circumstances, this may require the redevelopment of land categorised as Grades 1, 2 and 3a of the Agricultural Land Classification. As such, it must be clear what evidence is required to justify the release of these sites.

Tests of Soundness

2.41 Prologis considers that Policy DS1(S) fails to meet the following tests of soundness because it is not:

- 1 **Effective:** Policy DS1(S) D(ii) will not be effective in delivering growth in line with the wider spatial strategy (DS2(S)), as it is overly restrictive and will reduce the availability of sufficient greenfield land to meet economic and housing needs, given the finite availability of brownfield land in the Borough.
- 2 **Consistent with National Policy:** The wording is inconsistent with national policy, due to the differences in wording with paragraph 174b of the NPPF.

Recommended Changes

2.42 In order to address the conflicts identified above and ensure that Policy DS1(S) D(ii) is sound, it is requested that Bedford Borough Council reword the text to ensure that it is consistent with paragraph 174b of the NPPF. It should also set out clearly what evidence is needed to justify the release of high-grade agricultural land, given that the Council’s long term economic and housing objectives cannot be fulfilled on the basis of brownfield land release alone.

Policy DS2(S) Spatial Strategy

- 2.43 Policy DS2(S) sets out where new housing and employment development is expected to be delivered across the Borough, establishing those areas best suited for new site allocations, while providing a framework for determining planning applications that come forward on unallocated sites.
- 2.44 The Policy seeks to ensure that development is focussed either in existing urban areas, strategic locations that are adjacent to the urban area, or within certain growth locations within the A421 / East West Rail corridor. It also supports development in locations that are “*well-related to the strategic road and rail network*” as being suitable for employment purposes.

Consideration of Policy

- 2.45 Prologis **objects** to Policy DS2(S). The supporting text appears to give primacy to brownfield over greenfield sites. Additional employment land allocations must also be made in the A421 / East West Rail corridor, which have the potential for rail-based economic growth. **In its current form we consider the policy unsound and recommend it is redrafted to overcome this issue.**
- 2.46 Prologis agrees to the principle of encouraging development in existing urban areas and other accessible locations, where this is appropriate. Encouraging densification and compact forms of development in these areas may help to reduce the frequency and duration of car journeys, with the positive effect of reducing emissions and carbon reductions, ensuring communities and visitors have good access to amenities, while also encouraging healthy lifestyles.
- 2.47 While opportunities for development in existing urban locations may play a modest role in delivering on Bedford’s future economic growth, it should be recognised that these areas alone will only accommodate a limited amount of the Borough’s identified needs. Certain employment uses, such distribution centres, manufacturing, and science parks will often be less well suited to locations in existing built-up areas. Sites on the periphery of settlement boundaries, with good access to existing and planned transport hubs and the trunk road and motorway network, will often be more appropriate for these large-scale employment uses.
- 2.48 Prologis agrees that the Policy should focus economic growth at locations around the East-West Rail / A421 transport corridor, where there is also significant potential for rail-based growth and stronger links with the areas to the east of the Oxford-Cambridge Arc. Faster journey times, reduced transport costs, and greater transport capacity will create much stronger economic ties with Cambridge, creating significant opportunities to pull in the higher value jobs and investment opportunities that Bedford sets out in its *Economic Growth Ambitions Topic Paper*. These areas are set to experience a significant increase in house building over the years ahead. The increase in households in these areas would provide further opportunities for economic growth due to the larger pool of workers in the area.
- 2.49 This should create greater demand for high-quality employment floorspace on both greenfield and brownfield sites. The delivery of this space will be crucial in driving forward

investment from businesses in advanced manufacturing, R&D, and life-sciences. This is in addition to the existing high demand in the area for logistics and distribution. Despite this, Policy DS2(S) does not go far enough in planning for strategic economic growth in the A421 / East West Rail corridor. With the potential for a new station at St Neots and major improvements planned to the A428 and Black Cat round about, the strategy should be far more ambitious in delivering employment land that can benefit from this considerable investment in infrastructure. In order for this Policy to be sound, it should identify additional employment sites in this area, including Land West of A1, Wyboston.

2.50 The supporting text of Policy DS2(S) states that “*that new development will be focussed firstly on brownfield sites within the urban area and town centre regeneration opportunities*”. Prologis considers this wording to be particularly unhelpful as this appears to give primacy to brownfield areas over other suitable sites. A hierarchical approach to identifying sites will not be appropriate, given the diverging needs and constraints of different land uses.

2.51 With regards to employment land, Prologis considers that it does not properly take into account the scale and locational requirements of new employment uses in Use Class E (g), B2 and B8.

Tests of Soundness

2.52 Prologis considers that Policy DS2(S) fails to meet the following tests of soundness because it is not:

- 1 **Positively Prepared:** Policy DS2(S) is not based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. It does not properly recognise the strategic opportunities in the A421 / East West Rail corridor in line with economic development needs and does not identify a sufficient number of employment sites that can deliver the level of growth needed to meet the SDBLP’s Vision and overarching economic objectives.
- 2 **Consistent with National Policy:** The NPPF does not seek to prioritise the development of brownfield allocations over alternative greenfield and Green Belt allocations.

Recommended Changes

2.53 In order to address the conflicts identified above and to ensure that Policy DS2(S) can be found sound, it is requested that Bedford Borough Council reword the text to ensure that it identifies a strategy that properly takes into account the scale and locational requirements of new employment uses in Use Class E (g), B2 and B8.

2.54 BBC should also delete the supporting text suggesting that “*new development will be focussed firstly on brownfield sites within the urban area and town centre regeneration opportunities*”.

2.55 The Policy should be more ambitious and identify additional, deliverable employment land sites on the East West Rail / A421 transport corridor which have the potential for rail-based economic growth. This should particularly focus on those sites which have few technical constraints and perform well against the Council’s SA framework. Prologis’s site at Land West of A1, Wyboston would help the Council capitalise on this opportunity and help

deliver a more robust strategy that would go much further in delivering against the SDBLP's strategic objectives.

Policy DS4(S) Amount of Employment Growth

2.56 Policy DS4(S) sets out the amount of net employment growth that is expected to come forward over the Plan period. This suggests that there will be an additional 26,700 additional jobs created over the lifetime of the Plan.

2.57 The supporting text states that the number of jobs is a forecast and not a target. It goes on to suggest that as explained in the Council's Economic Growth Ambitions Topic Paper, the focus is on creating the 'right' kind of jobs⁵ which will strengthen the local economy and create a prosperous future for the Borough and its residents:

"The jobs created will span a range of sectors and the jobs related to office, industrial and warehousing development (about 39% of the new jobs likely to be needed) will require the allocation of additional land. The Employment Land Study topic paper sets out that it is appropriate for the plan to identify between 118 and 142 ha of employment land. Policies HOU 12, HOU 19 and EMP 1 - EMP8, identify sufficient land to meet the upper end of this forecast. The number of hectares of land allocated is sensitive to the employment types being planned for as different land uses have different space requirements." [paragraph 4.30]

Consideration of Policy DS4(S)

2.58 Prologis **strongly objects** to Policy DS4(S) on the basis that it is not supported by a sound and robust evidence base and does not identify a specific employment land requirement.

2.59 Paragraph 81 of the NPPF states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Policy DS4(S) does not do this; it simply refers to a jobs forecast, which the Council clarifies is not even a 'target'. The supporting text refers to the Council's Employment Land Study Topic Paper, which states that it is appropriate for the plan to identify between 118 and 142 ha of employment land. However, this is not the overall requirement; the Council's Bedford Employment Land Study Part 1 (May 2022) actually indicates that the overall requirement for employment land over the 20-year period 2020-2040 is between 142 and 166 ha of office, industrial and warehousing employment land, less around 24 ha of existing commitments.

2.60 The Policy also fails to accord with paragraph 82 of the NPPF. This requires that:

"Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks

⁵ The Bedford Economic Growth Ambitions Topic Paper makes it very clear that the 'right kind' of jobs are not B8 distribution: *"Land allocations need to be made in locations where they will deliver a wider range of jobs, including a much greater proportion of those that are higher value and related to non-B8 sectors, (for example, manufacturing, life sciences and green economy). The allocation of employment land, and the attraction of non-B8 jobs as a result of policy intervention, would provide the opportunity for Bedford to develop a more balanced, productive and therefore higher value economy. Pivotal to this is the planning of a strategically located employment site at Kempston Hardwick which is ideally placed on the EWR line to deliver a local innovation hub."* [page 4]

of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.”

- 2.61 No specific provision is made for storage and distribution operations at a variety of scales and in suitably accessible locations. Indeed, the Council does not even specify in Policy DS4(S) what the level of need is for logistics in the Borough, much less how this need is to be addressed.
- 2.62 Prologis also disagrees with some of the views expressed in the *Economic Growth Ambitions Topic Paper (2022)* regarding the need for logistics in the Borough moving forward, and which is referred to in the supporting text to Policy DS4(S). The Topic Paper seeks to attract higher value uses and shift the balance away from B8 uses which have driven high levels of take up and growth in the Borough in the recent past. Without a more detailed breakdown of how much land should be dedicated to different types of employment use, there is little certainty that these will come forward in the quantities needed, whilst it is counter-productive to attempt to scale back the level of B8 provided and rely on adjoining districts to meet Bedford’s future needs.
- 2.63 Prologis notes that Bedford is located at the very heart of the Oxford-Cambridge Arc, which has tremendous growth potential, whilst the wider SEMLEP sub-region also has strategic logistics requirements that could potentially be located in Bedford Borough. Whilst this latter issue is a matter for a separate study currently being undertaken on behalf of the LEP, it is nevertheless important to acknowledge at the outset that Bedford has considerable growth opportunities to take on wider strategic needs given its excellent access to the strategic highways network and the East West Rail infrastructure improvements. Future B8 allocations will be a necessity and the Council is wrong to downplay the contribution logistics makes to the local economy.
- 2.64 The Council has stated that its needs for strategic B8 land can be met entirely within neighbouring authorities. As stated in its Employment Land Study Part 1 (May 2022):
“Although warehousing sites will be required in the borough to meet local needs and ‘final mile’ distribution, as set out above, any requirements for regional or national distribution centre warehousing in the foreseeable future are likely to be catered for by the extensive allocations for large-scale strategic warehousing that have been made in nearby local authorities. For example, the recently adopted local plan for Central Bedfordshire allocates 183 ha on four sites to cater for ‘footloose’ demand in the logistics and distribution sector. These sites are Marston Gate (30 ha at junction 13 of the M1 motorway), Marston Valley (30 ha), Sundon Rail Freight Interchange (45 ha on the M1 and near Biggleswade (78 ha on the A1 trunk road). Although only two of these sites are in the A421 corridor, by catering for ‘footloose’ warehousing in the immediate area, there is unlikely to be a need for such sites in Bedford Borough.” [BELS Part 1, paragraph 9.13]
- 2.65 There is no robust justification put forward for the sustainability (or appropriateness) of this strategy within the SDBLP’s evidence base. As discussed above, there is no evidence in the Duty to Cooperate documentation that suitable conversations have taken place with neighbouring authorities or that formal agreements have been made with any neighbouring authorities, to ensure that the Borough’s strategic logistics needs have been met. The Council should delay the final submission of its Plan until it can suitably evidence that the Duty to Cooperate requirement has been adequately met with neighbouring authorities.

- 2.66 Furthermore, the 118 ha and 142 ha of employment land that BBC considers it appropriate to plan for, significantly underestimates the true level of employment land that is actually going to be required to meet its needs over the Plan period.
- 2.67 Lichfields undertook a detailed critique of the Council's employment land evidence in the accompanying Employment Land Technical Paper. Whilst many elements of the Council's BELS are welcomed (including the general principles underpinning the methodology), unfortunately there are some **serious flaws in the detail of the approach which means that the range of 142-166 ha is unsound. The evidence does not provide a robust basis for making sound and informed decisions for Plan-making.**
- 2.68 These issues include, but are not limited to:
- The reference throughout to the old B-Use Classes, rather than the correct E(g)/B2/B8 use classes, on the grounds that it is too complicated and would prevent comparisons with previous work. This results in light industrial needs being conflated with general industrial requirements, with issues concerning employment densities and under-estimating land requirements as a result.
 - The employment densities used in the BELS appear low, particularly for B8 logistics, which could suppress the likely floorspace requirements for a given level of job growth.
 - The Council has made some clear errors in its calculations of past losses and take up, resulting in its employment land calculation significantly underplaying the actual requirement by around 183,040 sqm or 46 ha.
 - No past take up modelling has been undertaken despite its requirement in the PPG. If undertaken, and based on the Council's own figures, this would suggest a need for at least 178 ha of employment land in isolation.
- 2.69 In particular, the Council's employment land evidence base does not address the needs of strategic logistics despite this being a specific requirement of the NPPF. The Local Plan is premature in this regard, as it has been issued ahead of a SEMLEP study that will seek to identify the needs of 'big box' logistics across the entire South East Midlands. Given this evidence is not yet complete, it is premature of the Council to set its employment target at 160 ha. In particular, the Council does not make proper allowance for B8 logistics, but is expecting others to provide for its ongoing warehousing and distribution needs without a formal undertaking as part of the Duty to Co-operate or Statement of Common Ground.
- 2.70 Lichfields undertook a detailed analysis of employment land needs that involved an objective assessment of the future demand for commercial and industrial floorspace across Bedford Borough between 2020 and 2040, using the Council's own evidence, corrected and updated where appropriate.
- 2.71 The new assessment indicates that there is a need for at least 189 ha – 226 ha of employment land and potentially significantly more once strategic B8 logistics requirements are factored in. This is around 47-60 ha higher than the range that has informed the emerging Local Plan, at 142 ha – 166 ha. It also indicates a very substantial requirement for industrial and warehousing land across all of the scenarios, and between 111 ha and 120 ha for the two key scenarios.

Tests of Soundness

2.72

Prologis **objects** to Policy DS4(S) and considers that it fails to meet the following tests of soundness because it is not:

- 1 **Positively Prepared:** Policy DS4(S) is not based on a strategy which seeks to meet objectively assessed development needs and infrastructure requirements. The Policy does not clearly identify the entire employment land requirement for the Borough, and the supporting text refers to a level of need that is not robust and is substantially below the true level of need. It does not plan for strategic B8 logistics and indeed is premature in that it has been published ahead of a sub-regional Strategic Employment Land Requirements Study that is currently being produced on behalf of SEMLEP and which could identify a substantial level of unmet need for strategic B8 logistics over the coming years.
- 2 **Justified:** The Council has not robustly justified the amount of employment land required in Bedford Borough. Furthermore, it has failed to provide a breakdown of E(g), B2 or B8 needs and how this relates to the 26,700 jobs forecast. Further work needs to be undertaken in order to identify a robust employment land requirement and how this should be broken down by Use Class.
- 3 **Effective:** The policy is not effective as it fails to identify the total amount of employment land that is needed within the Borough. Nor does it break this down by Use Class, or strategic B8. Furthermore, the evidence base upon which it relies upon does not actually calculate the need for Eg(iii) at all, with the BELS Part 1 referring to the outdated B1(c) use classification throughout. This is also needed for monitoring purposes going forward to 2040 and beyond. As a result, the SDBLP fails to allocate a sufficient number of employment sites to meet the Borough's economic growth needs. This will create a significant barrier to the Borough in delivering the type of high-quality employment floorspace currently demanded by the life sciences sector in particular.
- 4 **Consistent with National Policy:** The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and help create the conditions in which businesses can invest, expand and adapt. At present, the Policy does not provide any certainty as to the direction of travel of the Borough's economy, nor how this would be achieved given that there is no land target. It does not specify that any employment land target should be a minimum in order to provide the necessary flexibility as required by the NPPF. It does not recognise or address the specific locational requirements of storage and distribution operations.

Recommended Changes

2.73

In order to address the conflicts identified above and ensure that Policy DS4(S) is sound, it is requested that Bedford Borough Council

- 1 Significantly reword the text to ensure that it identifies a strategy that properly takes into account the scale and locational requirements of new employment uses in Use Class E(g), B2 and B8;

- 2 Increase the minimum employment land requirement to at least 189-226 ha and break this requirement down by Use Class. This requirement should be specified in the Policy rather than the supporting text;
- 3 Allocate Land West of A1, Wyboston site to ensure the delivery of a high-quality mixed use employment site in line with the Council's aspirations and to help meet employment land needs in full. The site should be referred to specifically in Policy DS4(S), in order to provide greater market certainty as to the economic ambitions of the Council for this part of the Borough.
- 4 Make suitable provision for strategic B8 development on top of the aforementioned indigenous employment land requirement following the findings of the SEMLP Strategic Logistics requirements study.

Policy DS5(S) Distribution of Growth

2.74 Policy DS5(S) sets out the key locations in which growth will be focused across the Borough, setting out the amount of land allocated for both housing and employment uses in Bedford Borough. The supporting text to the Policy states that no new allocations will be made in Key Service Centres and Rural Service Centres in the Local Plan 2040, although some Parish Councils may choose to allocate further sites for development in their neighbourhood plans to meet particular local needs.

2.75 Policy DS5(S) allocates employment land in the following locations:

- 5 ha within the urban area (this does not include 20.4 ha at Pear Tree Farm which is land allocated in ADLP Policy AD11 and counted as a commitment);
- 7 ha in strategic locations adjacent to the urban area which contribute to delivering the Forest of Marston Vale incorporating the Bedford Milton Keynes Waterway Park and the Bedford River Valley Park;
- Growth locations on the A421 transport corridor and with the potential for rail-based growth:
 - 70 ha at a new settlement South of Bedford (Kempston Hardwick);
 - 4 ha at the Little Barford new settlement;
 - 50 ha in other employment sites across the Borough.

Consideration of Policy DS5(S)

2.76 Prologis **does not support** this Policy on the basis that it is not sound. We consider the Policy will not be effective in delivering a suitable range of sites in the most appropriate locations, in line with the level of growth that should be expected across the Borough.

2.77 The Policy allocates 136 ha of employment land which, when added to the 24 ha of existing commitments, comes to a total of 160 ha to address needs over the Plan period. As set out above, this level is insufficient to meet the likely full needs over the next 20 years. Once errors are corrected in the Council's evidence base, Prologis considers that the true level of need is going to be at least 189-226 ha and probably significantly above this level once strategic B8 requirements are adequately factored into the methodology.

- 2.78 As such, the Council urgently needs to identify additional allocations of a range of size, types and locations to address this unmet need.
- 2.79 We consider that the distribution of economic growth established by this Policy also fails to take advantage of the improvements in infrastructure that are planned towards the eastern periphery of the Borough, notably the improvements at Black Cat Roundabout. This will involve the construction of an approximately 16km dual carriageway linking the A1 Black Cat roundabout to the A428 Caxton Gibbet roundabout in Cambridgeshire. Both existing roundabouts will also be upgraded into modern, free-flowing junctions and a new junction added at Cambridge Road, near St Neots. The works will transform one of the busiest road links in the East of England, helping drivers who live, work and travel in Bedfordshire and Cambridgeshire save an hour-and-a-half on their journeys each week, while also providing huge benefits for haulage. It will improve safety and cut journey times by up to a third, while helping to unlock economic growth in the area.
- 2.80 Further to this, public consultations are being held on the preferred routes for East West Rail, which could deliver a new station in the St Neots / Sandy area on the route between Bedford and Cambridge.
- 2.81 Prologis considers that in addition to providing a greater quantum of employment land to meet its needs in full, BCC should also allocate a greater mix of employment uses across Bedford, taking advantage of the strong linkages with nearby Cambridge to the east. Prologis's work in the sub-region has identified opportunities to provide spaces which will complement the high-value R&D Cambridge cluster. Cambridge has excellent facilities for research and development, in engineering and the life sciences; however, the higher land values in the area and Green Belt restrictions limit the opportunities for complementary uses, particularly for advanced manufacturing and processing.
- 2.82 **Prologis's site in Wyboston is able to deliver on these ambitions now, and should be allocated if the Borough is to meet its employment land needs in full within the plan period. We can deliver the high-quality mixed employment uses that the Council wants to see in the SDBLP.**
- 2.83 If allocated, Prologis' site on land to the West of the A1, Wyboston can achieve the viable development of life science manufacturing, whereas many comparable sites elsewhere in the sub-region cannot. The Cambridge life science ecosystem is focused on discovery and research and serviced land values can be £350+ psf. That has serious viability implications for the manufacturing part of the Life Science sector as land that could be considered for manufacturing in the wider Cambridge region has been repurposed over time for higher land values in the R&D sector and the fast-growing residential markets as the local population continues its rapid growth. For manufacturing space to be delivered viability studies suggest a sustainable land value at nearer £75psf of developable floor space. Hence locations outside of the wider Cambridge market such as the Wyboston site will be required to support the world-leading R&D discovery success of Cambridge.
- 2.84 Land at Wyboston can therefore act as a catalyst to linking Life Sciences R&D with manufacturing facilities across the Arc, providing a world leading development for high-value growth, innovation and productivity and provide exemplary models of a new 21st Century development that drives inclusive green growth in Bedford. Prologis's land at Wyboston is an excellent site with few technical constraints and infrastructure issues that a

large strategic site has. We have put forward clear evidence in our accompanying Site-Specific Representations that this development could come forward within the early years of the plan period, attracting investment from the life sciences and high-tech sectors. This site is likely to be in a position to come forward ahead of the 4 hectares of employment land at the much larger mixed-use development proposed at Little Barford nearby.

Tests of Soundness

2.85 Prologis considers that Policy DS5(S) fails to meet the following tests of soundness because it is not:

- 1 **Positively Prepared:** Policy DS5(S) is not based on an objective assessment of the development needs of the area. The Policy needs to allocate more employment land to meet needs in full, including smaller deliverable allocations capable of addressing the need in the shorter term. Furthermore, the preparation of the policy has not taken proper account of necessary cross-boundary discussions with neighbouring authorities across the wider SEMLEP area in relation to the quantum of strategic distribution development and, importantly, the location of such development – recognising that commercial demand for strategic distribution development does not adhere to local government administrative boundaries. The SEMLEP Strategic Employment Land Requirements Study may indicate a need to allocate additional strategic B8 sites to meet Bedford’s needs but no provision has been made for this in the SDBLP 2040.
- 2 **Effective:** Policy DS5(S) will not be effective in delivering growth in line with the wider spatial strategy (DS2(S)), failing to consider the true level of need for new employment land in the Borough and to allocate sufficient sites to meet this need. Some of the sites it relies upon to address the perceived need for ‘high value’ science park jobs are likely to come forward for alternative uses, such as distribution, with considerable delays to their timetable for delivery.
- 3 **Justified:** Policy DS5(S) is not justified. There are other appropriate employment sites located in the east of the Borough which the Council has failed to take proper account of. Prologis’s site at Wyboston would provide a more suitable location for additional employment land that is better able to align with the Council’s target economic growth objectives.

Recommended Change

2.86 In order to address the conflicts identified above and ensure that Policy DS5(S) is sound, it is requested that Bedford Borough Council:

- 1 Undertakes further consultation with neighbouring authorities, as it is clear that the duty to cooperate may not have been fulfilled with regards to the potential increase in demand for strategic B8 logistics following the SEMLEP Strategic Employment Land Requirements Study.
- 2 Allocate additional employment sites to address this unmet need, both in quantitative and qualitative terms. Although discarded by the Council following its submission to the earlier Call for Sites process by its site promoters, Land West of A1, Wyboston represents a uniquely propitious location to meet the Council’s need for in-combination development of life science manufacturing and modern logistics development in this part of Bedford. Policy DS5(S) should be redrafted so that it specifically refers to the

allocation of Land West of A1, Wyboston and establishes the principle of high-tech manufacturing, life sciences and other complimentary uses at the site. The site-specific representations that accompany this document provide further detail as to why this site is uniquely well placed to help Bedford's economy grow in a sustainable manner and how it can take advantage of the Oxford-Cambridge Arc and respond to pent up growth in the life sciences, tech and advanced manufacturing that are unfulfilled in Cambridge City in particular. If allocated, Prologis would deliver a flagship, high-quality mixed-use employment development with an emphasis on life science manufacturing and modern logistics development at Wyboston totaling 17.05 ha. This could meet 64% of the unmet employment land need at the lower end of Lichfields' range, and 28% of the unmet need at the upper end of the range.

- 3 Significant ground works and infrastructure would be needed to bring forward the 4ha of employment land at the Little Barford site (HOU14). In light of the time constraints associated with bringing this and other sites forward, Policy DS5(S) should allocate sites that will meet its identified needs over a consistent trajectory. This should include sites with few technical constraints which can come forward now, including Land West of A1, Wyboston site.

Policy HOU19 Little Barford New Settlement

- 2.87 This Policy seeks to allocate land at Little Barford as a new settlement. The site is located to the north east of Bedford, close to the neighbouring town of St Neots. The proposed settlement is estimated to deliver at least 4,000 new homes, with 3,800 of these being delivered over the plan period.
- 2.88 The allocation is also expected to deliver 4 ha of employment land. Approximately 3.6 ha of this is intended as industrial and warehousing which will be located adjacent to and act as an expansion of the existing Little Barford employment area.

Consideration of Policy

- 2.89 Prologis objects to Policy HOU19. The proposals for the site are not capable of delivering sufficient employment land to meet the future economic growth needs for this part of the Borough.
- 2.90 If the site comes forward as planned in the BLP 2040, then this would lead to a significant increase in the number households living in this part of the borough and increase the working age population, which would in turn lead to an increased demand for employment land in the vicinity of the site.
- 2.91 However, only 4 ha of employment land is allocated at Little Barford. This falls far short of the actual volume of employment land that may be required in this location, particularly given the improvements in transport connectivity which will make this area an attractive location for businesses to locate and expand (most notably for those industries with close links to the high value research sectors in Cambridge). Given the proposals for a new station at St Neots and improvements planned to the A428, the Plan should be more ambitious in allocating additional employment land in this broad locality.

2.92 There are also a number of constraints for this new settlement more generally. The site is crossed by a number of high-pressure gas pipelines and overhead electricity lines requiring easements. The possibility that the new East West Rail may run through the site should also be considered when developing the site, while the Council's Highways Team has advised that widening of Barford Road and new junctions would be required for access. As such, given these constraints and the scale of development, it is likely that this site will take many years to come forward, if at all. By allocating Prologis's unconstrained site on Land to the West of the A1, Wyboston, this could help address the need for high quality employment land in the Borough in the short term.

2.93 It should be noted that there is no reliance on the allocation of the Little Barford New Settlement to support the allocation of the Prologis Wyboston site.

Tests of Soundness

2.94 Prologis objects to Policy HOU19 and considers that it fails to meet the following tests of soundness because it is not:

- 1 **Positively Prepared:** Prologis considers that Policy HOU19 is not based on an objective assessment of the development needs for this part of the Borough. The council's evidence base demonstrates there are excellent opportunities for employment in this area, the Policy should allocate additional E(g)/B2/B8 sites, including smaller, unconstrained allocations that can be delivered more quickly to meet the Borough's immediate needs.
- 2 **Effective:** c.4ha of employment land on its own will not provide sufficient opportunities to deliver the level of jobs growth anticipated for this wider area, given the expected infrastructure improvements for the area.

Recommended Changes

2.95 The BLP 2040 should allocate the Land West of A1, Wyboston site for employment use to meet the needs for the forms of employment proposed by Prologis in Bedford Borough. This would ensure that there is a sufficient pipeline of employment land in an area proposed for significant improvements to the strategic highways and rail infrastructure and should the allocation of the Little Barford site be confirmed would have an additional benefit of providing employment of a more appropriate scale to provide locally sources jobs for that development. The Wyboston site is capable of being developed rapidly by a developer with a proven track record for delivering high quality employment space in line with the council's net zero ambitions. Bringing forward E(g)/B2/B8 development at an earlier stage in the Plan will help to establish the area's credentials as a location for high-tech manufacturing.

Policy EMP6 Business Park, Land at Water End and St Neots Road

2.96 This Policy allocates the site at Water End / St Neots Road, for 30 ha of employment land, with a focus on delivering a "*research campus-style development, primarily for research and development with elements of manufacturing, warehousing and distribution*". The

allocation is made up of two sites, split between the north and south sides of the A421 to the west of Great Barford.

Consideration of Policy

- 2.97 Prologis supports the principle of economic development in the A421 Corridor as exemplified in Policy EMP6, we consider that additional unconstrained employment sites should be delivered in the wider area capable of coming forward in the short to medium term. The site has the potential to deliver high quality employment space in line with the Council's economic growth ambitions. However, given the site's size and constraints, it is likely to take some time to build out.
- 2.98 Development at this site would require the modification to the existing roundabout of the A4280 St Neots Road, the A421 eastbound slip roads, Water End and the Link Road between the two roundabouts. There are also a number of listed buildings directly to the south of the site and to its west, as well as underground pipelines running through the site. These constraints and the relatively large scale of the site is likely to mean that it will take a number of years to come forward.
- 2.99 Allocating additional employment land in the area would help to complement the wider economic transformation of this part of Bedford and stimulate the further investment in jobs in the area. Given there are no significant constraints relating to Prologis's site on Land to the West of A1, Wyboston, this site could complement the offer of the EMP6 allocation, securing the area's reputation for high quality employment space and attracting additional investment in innovation and advanced manufacturing that would secure the viability of this site.

Tests of Soundness

- 2.100 Prologis objects to Policy EMP6 and considers that it fails to meet the following tests of soundness because it is not:
- 1 **Effective:** Without additional land and a greater mix of employment sites being allocated for high value uses over a reasonable timeframe, there is a risk that the Plan will not deliver the growth ambitions of the Council. This site may take a number of years to come forward, given its size and the potential technical constraints that may slow down its delivery. The expansion of businesses in research and manufacturing will require additional sites to come forward now.

Recommended Changes

- 2.101 The Council should allocate additional employment sites such as the Land West of A1, Wyboston Site. As a smaller unconstrained site, it is capable of addressing the identified need in a much shorter period. This is an excellent site with few technical constraints, with clear evidence set out in the accompanying site-specific representations that it could come forward within the early years of the plan period, attracting investment from the life sciences and high-tech sectors. The site can be brought forward by a developer with a proven track record for delivery and who will meet all of the requirements of the development plan with regards to climate change and net zero carbon.

Policy DM7 Environmental Net Gain

- 2.102 Policy DM7 seeks to ensure new development delivers Environmental Net Gain. This is defined as the combination of Biodiversity Net Gain and the improvements in natural capital (i.e., improvements to habitats, soils, and water systems etc).
- 2.103 This means not only mitigating the potential impact of new development on natural capital, but leaving sites in a better condition than before the development has taken place. The Policy requires planning applications to demonstrate how net biodiversity and net environmental gain will be achieved through the production of a supporting statement that considers the contribution the proposal could make to the Borough's natural capital.

Consideration of Policy DM7

- 2.104 Prologis **broadly supports** the principle behind this Policy. Environmental Net Gain can help ensure that all development can contribute to improvements in the natural environment over time.
- 2.105 However, Policy requirements need to be informed by evidence of their associated costs. A proportionate assessment of viability should take account of the costs of this policy, alongside the requirements of all other local and national policies and standards.
- 2.106 Environmental Net Gain will lead to additional costs and may result in viability issues on some challenging sites, while measures should also be in place to ensure Bedford Borough Council has the resources and skills in place to support the delivery of this Policy.
- 2.107 Prologis requests that evidence is put in place to ensure that all allocated sites within the borough can viably accommodate the proposed quantum of development, alongside the ecological mitigation measures that are necessary to deliver an uplift in Environmental Net Gain as required by Policy DM7. These should be properly accounted for in the viability evidence for the draft Plan.

Tests of Soundness

- 2.108 Prologis considers that Policy DM7 fails to meet the following tests of soundness because it is not:
- 1 **Consistent with National Policy:** The policies in the Plan must be viable in accordance with the policies in the Framework, to ensure they are deliverable and that costs can be accounted for in any land transactions. Policy requirements should be informed by evidence of their costs and based on an assessment of viability that takes into account the cumulative impact of all relevant policies, such as those for biodiversity net gain, alongside other local and national standards.

Recommended Change

- 2.109 In order to address the conflicts identified above and ensure that Policy DM7 is sound, it is requested that Bedford Borough Council:
- 1 Provide specific evidence of the costs involved in delivering Policy DM7. Viability assessments should consider all instances when such policies are shown to have an

impact on the schemes costs, and consider how these may diverge across different sites, depending on the existing conditions.

Policy DM8 New employment development in the countryside

- 2.110 Policy DM8 seeks to restrict new office, industrial, warehousing and sui-generis business uses in the countryside unless it complies with a series of very specific circumstances. This includes:
- i Where it is within an existing employment area; or
 - ii Where it reuses land last used for office, industrial, warehousing or sui generis uses or reuses existing buildings; or
 - iii Where it enables the expansion of an established business within its existing operational site; or
 - iv Where it enables the development and diversification of agricultural and other land- based rural businesses; or
 - v Where it enables the limited enlargement of an existing employment area.
- 2.111 Proposals for employment land in these locations are required to meet very specific conditions. These include:
- i If a new building is proposed, there are no existing buildings that could be used for the proposed use;
 - ii Open storage is ancillary to employment buildings and is located in well-contained and screened areas of the site with an appropriate height restriction;
 - iii The proposal would not generate traffic movement and volume that would lead to unacceptable environmental impacts or detriment to highway safety objectives;
 - iv The proposal would not have a significant adverse effect on the established character of the area and the local amenities and adjoining land uses and accords with Policy 41S;
 - v There would be no adverse impact on biodiversity including national site network (formerly Natura 2000) sites in accordance with Policy 42S.

Consideration of Policy

- 2.112 Prologis **objects** to this policy as the wording is not positively prepared, effective or consistent with national policy. This will not assist in the implementation of the level of economic growth needed to support the allocations. It also fails to provide the level of flexibility required to respond to a rapidly changing commercial and industrial market.
- 2.113 At present, the wording is far too restrictive to enable the necessary larger scale employment sites to come forward in areas most attractive to the market and does not recognise that sustainable development can be delivered on other sites too. The evidence

prepared to underpin the BLP 2040 demonstrates that there is not a sufficient supply of brownfield land to meet the identified employment land needs. As a result, the development of greenfield sites for employment land can perform a significant role in achieving a sustainable pattern of development and meet the development needs of the wider area.

2.114 As set out in our response to DS1(S) D ii above, given the need and ambition for employment growth in the area and the limited supply of land in existing urban areas and on brownfield sites, there will be a need to allocate sites previously used for agricultural purposes in the countryside.

2.115 The development of employment land in the countryside, in well-connected locations, with good access to local amenities, can play a crucial role in meeting the areas objectively assessed needs in a sustainable way. As such, it must be clear what evidence is required to justify the release of these sites.

Tests of Soundness

2.116 Prologis considers that Policy DM8 fails to meet the following tests of soundness because it is not:

- 1 **Effective:** Policy DM8 will not be effective in delivering growth in line with the wider spatial strategy (DS2(S)) and economic growth needs DS4, as it is overly restrictive and will reduce the availability of sufficient greenfield land to meet economic and housing needs, given the finite availability of brownfield land in the Borough.
- 2 **Consistent with national policy:** The policy must align with the objective of the NPPF to achieve sustainable development by supporting the economic, social and environmental objectives interdependently and in mutually supportive ways. For example, paragraph 83 requires that planning policies should recognise and address the specific locational requirements of different sectors, such as storage and distribution operations at a variety of scales and in suitably accessible locations. This may often be on greenfield sites in the countryside, in suitably accessible locations adjoining strategic road junctions.

Recommended Changes

2.117 In order to address the conflicts identified above and ensure that Policy DM8 is sound, it is requested that BBC rewords the text to ensure that it is clear what evidence is needed to justify the release of countryside, given that the Council's long term economic and housing objectives cannot be fulfilled on the basis of brownfield land release alone.

Celebrating
60
years

Birmingham

0121 713 1530

birmingham@lichfields.uk

Edinburgh

0131 285 0670

edinburgh@lichfields.uk

Manchester

0161 837 6130

manchester@lichfields.uk

Bristol

0117 403 1980

bristol@lichfields.uk

Leeds

0113 397 1397

leeds@lichfields.uk

Newcastle

0191 261 5685

newcastle@lichfields.uk

Cardiff

029 2043 5880

cardiff@lichfields.uk

London

020 7837 4477

london@lichfields.uk

Thames Valley

0118 334 1920

thamesvalley@lichfields.uk



@LichfieldsUK

lichfields.uk