

Our ref: MLP/Wyboston 014207

Your ref:



28 July 2022

Local Plan 2040 consultation
Planning Policy Team
Bedford Borough Council
Borough Hall
Bedford
MK42 9AP

St Neots Office

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Dear Sir/Madam

EMAIL ONLY

LOCAL PLAN 2040: PLAN FOR SUBMISSION CONSULTATION

With reference to the above consultation, we are instructed to submit the enclosed Response Form and following representation on behalf of Wyboston Lakes Ltd.

Representation

The Local Plan 2040 strategy gives significant importance to the Oxford – Cambridge Arc strategy; a proposed new east-west railway connection with a planned new rail station in the area between Sandy and St Neots where the East West Railway (EWR) route crosses the East Coast Main Line; and the 10 mile duelling of the A428 carriageway between the Black Cat Roundabout (A421/A1 junction) and the Caxton Gibbet roundabout on the A428.

Recognising the Arc strategy and the infrastructure improvements, the new plan acknowledges *“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”*.

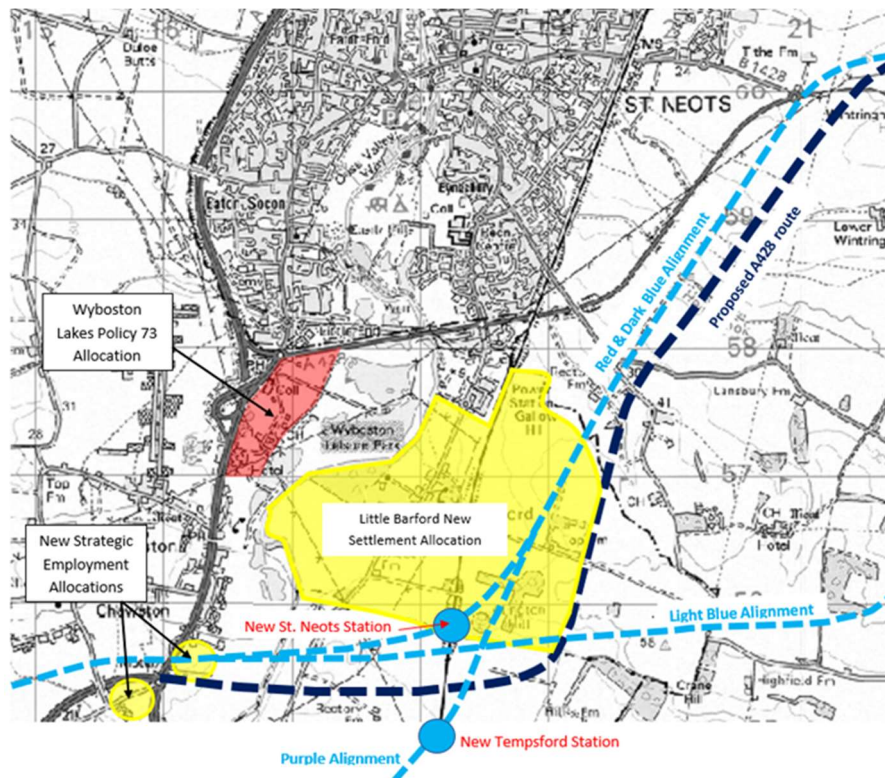
As a consequence, the new Local Plan strategy proposes several new growth locations in the eastern area of the borough focussed on the EWR/A421 transport corridor with the potential for rail-based growth, including a new settlement at Little Barford (Policy HOU19), 3 ha of employment land at College Farm, Black Cat roundabout (Policy EMP 7) and 17 ha of employment land at Roxton, south west of the Black Cat roundabout (Policy EMP8).

These strategic locations around the A1/A428 and south of St Neots represent a significant change in the development plan strategy, where the Bedford Borough development plans have historically focussed growth in and around Bedford.

However, the adopted plan does recognise the Wyboston Lakes Complex south of St. Neots, which is a major employer in the Borough, and Policy 73 clarifies *“Development at Wyboston Lakes which supports and enhances its role as a regional centre for leisure, training and conferencing will be supported”*.

The Local Plan text supporting Policy 73 also acknowledges *“In policy terms Wyboston Lakes is in the countryside but it is in close proximity to the A428 and A1 transport corridors as well as the urban area of St Neots. The site’s location provides an important opportunity for both London, Peterborough north/south connections as well Cambridge, Milton Keynes east/west connections”* (paragraph 11.30).

With the new plan proposals for sustainable strategic growth at the A1/A428 corridor and south of St Neots, the Wyboston Lakes Complex will sit within the identified new strategic growth area, and in close proximity of the proposed strategic developments, as seen in the plan below.



The Wyboston Lakes Complex in context with the proposed strategic growth developments, the new A428 route and the EWR options under consideration.

With the Wyboston Lakes Complex situated amongst the strategic growth developments, and the acknowledgement in the adopted Local Plan that the site is appropriate for further employment growth, it is considered the Complex has potential for a wider range of sustainable new employment uses. Reflecting this, Policy 73 should be reviewed as part of the Local Plan review to permit a broader range of new employment development, other than proposals “which supports and enhances its role as a regional centre for leisure, training and conferencing”.

Specifically, for reasons of soundness it is considered Policy 73 should be revised to express support for new employment development that will complement and contribute to the existing diverse range of uses on the Wyboston Lakes Complex.

The revision sought is intended to enable new employment development activities on the Complex **such as:**

- Offices falling in Use Class Order Class E(g)(i) Office use including; E(c)(i) Financial services, E(c)(ii); Professional services (other than health or medical services); and E(c)(iii) Other appropriate services in a commercial, business or service locality uses;
- Research and Development uses within Use Class E(g)(ii);
- Children’s nursery Use Class E(f) that would assist the needs of the parents employed on the site;
- New medical care developments, such as doctors’ surgery, diagnostic services and dental services within Use Class E(e).

It is considered the broader range of uses that are being sought will accord with the following policies of the National Planning Policy Framework.

- Paragraph 81: *Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.*
- Paragraph 82 d) *policies should be flexible enough to accommodate needs not anticipated in the plan.*

We trust the above will receive full consideration and we would be grateful to receive confirmation of receipt of the representation, and to be kept advised on the Local Plan review progress.

Yours sincerely

[Redacted signature]

For and on behalf of Brown & Co - Property and Business Consultants LLP
t/a Brown & Co Barfords

[Redacted contact information]