

**PRE-SUBMISSION BEDFORD LOCAL PLAN CONSULTATION (JUNE 2022)  
ABBEY FIELD WEST OF ELSTOW AND PEAR TREE FARM ELSTOW  
THE SOUTHILL ESTATE  
FINAL REPRESENTATIONS**

## **INTRODUCTION**

Bedford Borough Council is consulting on a Pre-Submission version of the Bedford Local Plan (PSBLP) between **15<sup>th</sup> June and 29<sup>th</sup> July 2022**. The Southill Estate has an interest in two sites that are allocated in PSBLP: Policy HOU5 - Abbey Field West of Elstow for residential development; and, Policy EMP5 - Pear Tree Farm Elstow for a science and innovation park. A complete version of the final representations is provided below. A comments form for each representation has been sent to the Council.

## **REPRESENTATIONS TO PRE SUBMISSION BEDFORD LOCAL PLAN**

### **Vision**

#### **SUPPORT**

The Vision refers to growth supported by infrastructure, sustainable transport, green infrastructure, new neighbourhoods, high quality commercial and office spaces, and good design. The Southill Estate owns two parcels of land that are identified as draft allocations in the Pre Submission Bedford Local Plan (PSBLP): land at Abbey Field West of Elstow site for residential development (Policy HOU 5); and land at Pear Tree Farm Elstow for a science and innovation park (Policy EMP 5). These two draft allocations could deliver parts of the Vision for PSBLP. The sites are well related to the urban area. The promoted developments would provide housing and employment including high quality innovation space, and would contribute towards the growth of the local economy. The sites are in an accessible location, and the promoted developments would provide connections by sustainable modes of transport. The promoted developments would include open space and green infrastructure, and would connect with a green corridor project in the surrounding area. The design and layout of the promoted developments would take into account the characteristics of the site and surrounding area, including the historic environment and landscape character. The Vision is supported, and no changes are required.

### **Themes**

#### **SUPPORT**

The PSBLP identifies four themes to deliver the Vision, which are as follows: greener; more accessible; more prosperous; and better places. The four themes are consistent with national policy and the sustainable development objectives contained in the NPPF. The Southill Estate owns two parcels of land that are identified as draft allocations in PSBLP, which would contribute towards the delivery of all four themes.

The greener theme refers to development integrating with the surrounding landscape and multi-functional green infrastructure. The promoted development at the Abbey Field West of Elstow site (Policy HOU 5) includes policy requirements for the delivery of open space, connections to an existing green corridor, and other green infrastructure. The promoted development at the Pear Tree Farm Elstow site (Policy EMP 5) includes policy requirements for contributions towards the Forest of Marston Vale, and the delivery of a green corridor and landscaping. Therefore, these two promoted developments would contribute towards the greener theme.

The more accessible theme refers to reducing congestion and encouraging travel by sustainable modes of transport. The promoted developments at Abbey Field West of Elstow and Pear Tree Farm Elstow include policy requirements for pedestrian and cycle connections with the surrounding area and existing networks. The promoted developments are in close proximity to one another, with one for residential use and the other for employment uses. The promoted developments are well related to the urban area, to other proposed strategic developments, and to proposed transport infrastructure projects. The promoted development would provide an opportunity for current and future residents to live close to work, and would make it more likely that travel for regular day to day journeys would be by sustainable modes of transport rather than the private car. Therefore, the promoted developments would contribute towards the more accessible theme.

The more prosperous theme refers to supporting a stronger local economy and delivering high value jobs. The promoted development at the Pear Tree Farm Elstow site is within the South of Bedford Area and is specifically identified as a draft allocation for a high value science and innovation park. As such, the promoted development would directly contribute towards the more prosperous theme.

The better places theme refers to meeting housing needs. The promoted development at Abbey Fields West of Elstow is for residential development, and would provide a mix of house types, sizes and tenures including affordable housing. The site is included in the housing trajectory for PSBLP, and it contributes towards the housing supply during the plan period. Therefore, the promoted development would contribute towards the better places theme. As set out in the Southhill Estate's representations to Policy HOU 5, the site could accommodate more dwellings and could be delivered much earlier than currently indicated in the housing trajectory. If the requested changes to Policy HOU 5 are made the promoted development would make a greater contribution towards the better places theme, and provide more housing earlier in the plan period.

The promoted developments at Abbey Fields West of Elstow and at Pear Tree Farm Elstow could contribute towards the delivery of all four themes.

## **Policy DS1(S): Resources and Climate Change**

### SUPPORT

Policy DS1(S) seeks to support a move towards carbon neutrality, and refers to minimising the need to travel, accessibility by sustainable modes of transport, the density of development, the use of renewable and low carbon energy, and the delivery of green infrastructure. The approach towards carbon neutrality is consistent with national policy contained in the NPPF, and in particular Sections 8, 9 and 14. The two promoted developments by the Southhill Estate at Abbey Field West of Elstow and

Pear Tree Farm Elstow are in accessible locations, and are well related to the urban area, to other proposed strategic developments, and to proposed transport infrastructure projects in the A421 Corridor. The promoted developments include policy requirements for pedestrian and cycle connections with the surrounding area and existing networks - see Policies HOU 5 and EMP 5. There is a clear opportunity for the promoted developments to minimise the need to travel and encourage the use of sustainable modes of transport. The promoted developments also include policy requirements for the delivery of open space and green infrastructure, and for connections to green corridors. As set out in the Southill Estate's representations to Policy HOU 5, the promoted development at the Abbey Fields West of Elstow site could accommodate more dwellings than currently indicated in the housing trajectory. An increase in the number of dwellings at the promoted development would increase the density, which would be more consistent with the aims of carbon neutrality. It is too early to determine the energy strategy for the promoted developments, but it is anticipated that the buildings would be energy efficient, and the developments would incorporate renewable and low carbon energy technologies. Therefore, the promoted developments would contribute towards carbon neutrality. The policy of moving towards carbon neutrality is supported, and no changes are required.

## **Policy DS2(S): Spatial Strategy**

### SUPPORT

Policy DS2(S) contains the spatial strategy for PSBLP, which seeks to focus development within the urban area, selected strategic locations adjacent to the urban area, and at growth locations within the East West Rail/A421 Corridor. The preferred spatial strategy is explained in the Development Strategy and Site Selection Topic Paper, which is based on Option 2b. The key parts of the preferred spatial strategy are set out in Paragraph 5.3 of the Topic Paper, which in summary concentrates growth in the urban area and in the A421 Corridor, at strategic employment sites well related to the strategic road and rail network, and in locations that would support strategic green infrastructure projects in the South of Bedford Area. The preferred spatial strategy is consistent with national policy contained in the NPPF in terms of sustainable transport objectives. Paragraph 105 of the NPPF expects the planning system to actively manage patterns of growth to support the delivery of sustainable transport objectives, with significant development directed to locations that are or can be made sustainable. Paragraph 106 expects planning policies to include the following: to support a mix of uses across an area; to minimise journeys within larger scale sites; to align strategies for sustainable transport and development patterns; to provide for attractive and well-designed walking and cycling networks; and to provide for any large public transport projects such as East West Rail.

The two promoted developments by the Southill Estate, which are identified as draft allocations in PSBLP, at Abbey Field West of Elstow (Policy HOU 5) and Pear Tree Farm Elstow (Policy EMP 5) are consistent with the preferred spatial strategy and with national policy relating to sustainable transport. The promoted developments are in accessible locations, and are well related to the urban area, to other proposed strategic developments, and to proposed transport infrastructure projects in the A421 Corridor including East West Rail. The promoted developments include policy requirements for pedestrian and cycle connections with the surrounding area and existing networks. The promoted

developments also include policy requirements for the delivery of open space and green infrastructure, and for connections to green corridors in the South of Bedford Area.

The spatial strategy contained in Policy DS2(S) is supported, and no changes are required.

## **Policy DS3(S): Amount and Timing of Housing Growth**

### OBJECT

The proposed housing requirement in PSBLP is a minimum of 27,100 dwellings between 2020 and 2040. A stepped trajectory is proposed with more significant growth proposed in the post-2030 period once critical infrastructure has been delivered. The Southill Estate does not object to the proposed housing requirement or the principle of applying a stepped trajectory. The Southill Estate owns the land at Abbey Field West of Elstow that is identified as a draft allocation for residential development (Policy HOU 5). This site is included in the housing trajectory for 200 dwellings and it is predicted that housing delivery would commence from 2030/31 – see Appendix 1 in Stepped Trajectory Topic Paper April 2022. As set out in the Southill Estate’s representations to Policy HOU 5, the site could accommodate more dwellings and could be delivered much earlier than currently indicated in the housing trajectory. It is requested that the housing trajectory is adjusted to include additional dwellings and an earlier delivery date from the site. This requested change would mean that additional dwellings could be delivered in the period 2025/26 to 2029/30.

Paragraph 74 of the NPPF requires a housing trajectory to be provided for development plans, setting out the expected rate of housing delivery during the plan period and if appropriate the delivery rates for specific sites. The housing trajectory for PSBLP should be included within the document, and not only shown in the Stepped Trajectory Topic Paper.

### Requested Change

It is requested that the housing trajectory is included in PSBLP as required by Paragraph 74 of the NPPF.

It is requested that the following changes are made to the housing trajectory and stepped trajectory:

- To increase the number of dwellings from the Abbey Field West of Elstow site (HOU 5) from 200 dwellings to approximately 400 dwellings, and to move the commencement of delivery date forward from 2030/31 to 2025 when 100 dwellings would be delivered per annum, with associated adjustments to the stepped trajectory.

## **Policy DS4(S): Amount of Employment Growth**

### SUPPORT

Policy DS4(S) seeks to deliver an additional 26,700 jobs, in order to create a high value and high skilled economy. The Economic Growth Ambitions Topic Paper provides information on the ambitions in PSBLP to rebalance the local economy, with less reliance on Class B8 warehouse and distribution uses and an increase in higher value added jobs. The Bedford Employment Land Study identifies the need and demand for employment land between 2020 and 2040, and assesses the sites that should be

allocated to meet the employment land supply. The Southill Estate owns the land at Pear Tree Farm Elstow that is within a larger allocated site for a science and innovation park in the adopted Allocations & Designations Local Plan (Site Ref. AD11 – Land at Medbury Farm), and it is proposed that this site is carried forward as a smaller draft allocation in PSBLP (Policy EMP 5 – Land at Pear Tree Farm). Paragraph 9.11 of the Employment Land Study Part 1 identifies the characteristics of potential employment land allocations, including having few constraints, an ability to accommodate flexible building types, providing connections to technology and communications infrastructure, and having good market visibility and proximity to an employment cluster. The land at Pear Tree Farm (identified as land at Medbury Farm) is assessed against suitability criteria in the Employment Land Study Part 2 – see pg.41. It is recommended in the Study that the site is retained as an employment allocation.

Section 6 of the NPPF provides national planning policy for the economy. Paragraph 81 provides support for economic growth and productivity. Paragraph 82 expects planning policies for economic development to include the following: to encourage sustainable economic growth; to identify strategic sites for inward investment to meet anticipated needs; to address potential barriers to investment including inadequate infrastructure; and to be flexible to meet future needs. Paragraph 83 expects planning policies to address the specific locational requirements of different sectors, including high technology industries. Policy DS4(S) of PSBLP is consistent with national policy, in that it is based on an assessment of employment land needs and demand, it supports economic growth, it seeks to meet the needs for higher value jobs, and specifically allocates land for research and development employment uses including at the Pear Tree Farm site.

Policy DS4(S) is supported, and no changes are required.

## **Policy DS5(S): Distribution of Growth**

### **SUPPORT**

Policy DS5(S) specifies the amount of housing and employment development directed to different locations within the plan area. The two parcels of land owned by the Southill Estate and identified as draft allocations, on land at Abbey Field West of Elstow (Policy HOU 5) and land at Pear Tree Farm Elstow (Policy EMP 5), are consistent with the proposed distribution strategy. The Abbey Field West of Elstow site falls within the urban area. The Pear Tree Farm Elstow site falls within a strategic location adjacent to the urban area. The proposed distribution is consistent with Paragraph 105 of the NPPF, which expects the planning system to actively manage patterns of growth to support the delivery of sustainable transport objectives, with significant development directed to locations that are or can be made sustainable.

As set out in the Southill Estate's representations to Policy HOU 5, the Abbey Field West of Elstow site could accommodate more dwellings than currently indicated in the housing trajectory. It is requested that the number of dwellings proposed for the urban area within Policy DS5(S) is increased to reflect the additional dwellings that could be delivered from the Abbey Field West of Elstow site i.e. an additional approximately 200 dwellings (and a total of approximately 400 dwellings).

It is noted that the proposed science and innovation park allocation at Pear Tree Farm Elstow is excluded from the employment land figures in Policy DS5(S) on the basis that as an existing

employment allocation it is categorised as a commitment. The draft allocation at the Pear Tree Farm site (Policy EMP 5) is slightly smaller than the adopted allocation at Medbury Farm (Site Ref. AD11), and it is proposed in PSBLP that Policy EMP 5 would replace Site Ref. AD11. It is suggested that, for clarity and for future monitoring purposes, the land at Pear Tree Farm should be included within the employment land figures for Policy DS5(S) i.e. within the figures for the strategic locations adjacent to the urban area.

The proposed distribution strategy in Policy DS5(S) is supported. It is requested that proposed number of dwellings for the urban area is adjusted to include additional dwellings at the Abbey Field West of Elstow site, and that the employment land figures for the strategic locations adjacent to the urban area includes the Pear Tree Farm site.

## **Policy HOU5: Abbey Field, West of Elstow**

### OBJECT

The Southill Estate owns the land at Abbey Field West of Elstow, and supports the draft allocation for residential development and agrees with the policy requirements for the promoted development. The decision to allocate the land has been informed by the assessment of the site against selection criteria and constraints in the Housing and Employment Land Availability Assessment and Site Assessments, and in the assessment of the site against sustainability objectives in the Sustainability Appraisal Report. The site is consistent with the spatial strategy and distribution strategy contained in PSBLP. The site is also consistent with national policy contained in the NPPF, in terms of the preferred location for strategic development and accessibility by sustainable modes of transport.

A Heritage Impact Assessment has been prepared for the site to assess the impacts on heritage assets and set out mitigation and enhancement measures to address those impacts; the Assessment was submitted with the Southill Estate's representations at Draft Local Plan stage in Summer 2021. An updated Bedford Innovation Campus Indicative Masterplan Document is submitted with these representations.

A more detailed commentary on these matters is provided below.

Policy HOU 5 identifies a number of key principles for the promoted development, which are included to ensure a high quality scheme and that the opportunities associated with the location of the site are delivered, and to ensure that significant constraints are addressed. For example, there are policy requirements relating to heritage assets, open space, green infrastructure, noise pollution, housing mix, access arrangements, pedestrian and cycle connections, education contributions, archaeology, flood risk, ecology, climate change, and water infrastructure. These policy requirements have been informed by the findings of the site assessment process.

The policy requirements in Policy HOU 5 are consistent with national policy contained in the NPPF. For example, there are sections of the NPPF that address housing (Section 5), communities (Section 8), sustainable transport (Section 9), design (Section 12), climate change and flooding (Section 14), natural environment (Section 15), and historic environment (Section 16).

The site was assessed in the Housing and Employment Land Availability Assessment and Site Assessments (Site Ref. 638). The site assessment identified potential constraints associated with nature conservation, heritage assets, and noise. The assessment identifies uncertain impacts for protected species, biodiversity net gain, agricultural land, and flood risk. The assessment includes detailed commentary on highway, transport and access matters. Policy HOU 5 include policy requirements for nature conservation (criteria vii), heritage (criteria i(a)), and noise (criteria i(d)). The policy requires an assessment of ecology, flood risk and drainage, and transport to support a planning application. In addition, there is a policy requirement for a masterplan and design code to be submitted with a planning application. Policy DM7 of PSBLP provides the general policy for biodiversity net gain that applies to all major developments, including the promoted development at HOU 5.

The site was assessed against sustainability objectives in the Sustainability Appraisal Report and Appendices – see SA Appendix pg. 174 to 175. The Southill Estate’s representations to the Sustainability Appraisal comment in more detail on the findings of the assessment, and request changes to the scores for some sustainability objectives. In summary, negative effects are identified for biodiversity and habitats, historic environment, previously developed land, and community services and facilities. Policy HOU 5 includes policy requirements to address impacts on biodiversity and the historic environment and ensure that mitigation measures are provided as part of the promoted development. The promoted development would provide pedestrian and cycle connections to enable residents to access the services and facilities available in the surrounding area. The identified development needs for PSBLP will require both previously developed land and greenfield sites. The medium and longer term impacts on biodiversity and habitats, historic environment, and services and facilities should be changed to neutral or positive because of the policy requirements in Policy HOU 5 for effective mitigation measures to be implemented as part of the promoted development.

A Heritage Impact Assessment has been prepared for the site to address impacts on heritage assets. In summary, it is concluded in the Assessment that the draft site allocation would change the wider rural setting of Elstow Conservation Area, the Parish Church of St Mary and St Helena, Church Tower, and the Elstow Manor House Scheduled Monument including Hillersden Mansion. This change would result in no more than a minor adverse impact to their wider rural setting and would have no impact on the immediate setting of the assets. The impact on the wider rural setting of these designated heritage assets would amount to less than substantial harm to the significance of these assets. The conclusion of the Assessment demonstrates that in terms of impacts on heritage assets it would be appropriate to allocate the site in PSBLP. In any event, there is a policy requirement to assess heritage impacts at planning application stage once more detailed information is provided on the design and layout of the promoted development.

An updated Bedford Innovation Campus Indicative Masterplan Document has been prepared for the promoted development. This confirms that the site’s developers and landowners will continue to work proactively with Bedford Borough Council to bring forward the residential development of the site. This includes a commitment to meet the emerging policy requirements set out by policy HOU5.

It is noted that Policy HOU 5 does not specify the number of dwellings that could be accommodated within the draft allocation, which is an approach that is consistent with other strategic allocations. This site is included in the housing trajectory for 200 dwellings – see Appendix 1 in Stepped Trajectory Topic Paper April 2022. It is considered that the promoted development could accommodate more dwellings (approximately 400 dwellings) by increasing the density while still meeting all of the policy requirements. This is not a requested change to Policy HOU 5, but an adjustment is required to the housing trajectory for PSBLP.

In conclusion, the Southill Estate supports the draft allocation for residential development and agrees with the policy requirements for the promoted development. No changes are required to Policy HOU 5, but site capacity referred to in the housing trajectory should be increased to approximately 400 dwellings.

### *Requested Change*

No changes are required to Policy HOU 5, and the draft allocation and policy requirements should be retained.

It is requested that the predicted number of dwellings for the site in the housing trajectory for PSBLP is increased from 200 dwellings to approximately 400 dwellings; this requested change is consistent with representations to Policy DS3(S).

### **Policy HOU12: South of Bedford Area**

#### SUPPORT

Paragraph 4.77 sets out the Vision for the South of Bedford Area. Policy HOU 12 sets out the policy requirements for the Area. Figure 5 defines the boundary of the Area. The Southill Estate owns land at Pear Tree Farm Elstow, which is identified as a draft allocation for a science and innovation park (Policy EMP 5) and the site falls within the South of Bedford Area. The Pear Tree Farm site is identified for a high value science and innovation park, primarily research and development with elements of manufacturing, warehousing and distribution.

In summary, the South of Bedford Area is based on an environment led approach to development, and includes green infrastructure, access by sustainable modes of transport including rail, delivery of existing and proposed new settlements, and employment. The South of Bedford Area is consistent with Paragraphs 105 and 106 of the NPPF, in terms of directing significant development to locations that are or can be made sustainable, supporting the delivery of sustainable modes of transport, and providing a mix of uses including housing, employment and green infrastructure.

The draft allocation for a science and innovation park at the Pear Tree Farm site would contribute directly towards the vision for the South of Bedford Area, including by delivering employment, support for Forest of Marston Vale, and green infrastructure.

The South of Bedford Area is supported, and no changes are required to Policy HOU 12.

### **Policy EMP5: Land at Pear Tree Farm Elstow**

## OBJECT

The Southill Estate owns the land at Pear Tree Farm Elstow, and supports the draft allocation for a science and innovation park and agrees with the policy requirements for the promoted development. The draft allocation is on a smaller parcel of land that is allocated for the same use in the adopted Allocations & Designations Local Plan (Site Ref. AD11 – Land at Medbury Farm). The adopted allocation has already been assessed as sound, and it is proposed that the science and innovation park use is carried forward in PSBLP with a slightly smaller site area. The site is consistent with the spatial strategy and distribution strategy contained in PSBLP, and with the policy for the South of Bedford Area. The site is also consistent with national policy contained in the NPPF, in terms of supporting economic growth, meeting employment needs and the specific needs for high technology industries, the preferred location for strategic development, and accessibility by sustainable modes of transport.

Figure 10 provides the supporting site location plan for Policy EMP 5. An updated Bedford Innovation Campus Indicative Masterplan Document has been prepared for the promoted development at Pear Tree Farm (and the promoted residential development at Abbey Field West of Elstow allocation, also owned by the Southill Estate). The updated Masterplan Document includes a Concept Masterplan for the promoted development. It is requested that Figure 10 is amended to reflect the site area and Concept Masterplan in the updated Masterplan Document. It is amendments to Figure 10 that is the only basis for the Southill Estate's objection to Policy EMP 5.

The decision to allocate the Pear Tree Farm site has been informed by the Economic Growth Ambitions Topic Paper, and the assessment of the site against selection criteria and constraints in the Employment Land Study Part 2, and the assessment of the site against sustainability objectives in the Sustainability Appraisal Report.

The Economic Growth Ambitions Topic Paper provides information on the ambitions in PSBLP to rebalance the local economy, with less reliance on Class B8 warehouse and distribution uses and an increase in higher value added jobs. The proposed allocation for a high value science and innovation park would meet the ambitions to rebalance the local economy.

The land at Pear Tree Farm (identified as land at Medbury Farm) is assessed against suitability criteria in the Employment Land Study Part 2 – see pg.41. It is recommended in the Study that the site is retained as an employment allocation.

The site was assessed against sustainability objectives in the Sustainability Appraisal Report and Appendices – see SA Appendix pg. 210 to 212. The Southill Estate's representations to the Sustainability Appraisal comment in more detail on the findings of the assessment, and request changes to the scores for some sustainability objectives. In summary, negative effects are identified for biodiversity and habitats, historic environment, support for physical activity, and previously developed land. Policy EMP 5 includes policy requirements to address impacts on biodiversity and the historic environment and ensure that mitigation measures are provided as part of the promoted development. It is not normal for employment development to include land for recreational activities, but the promoted development would be accessible by walking and cycling and would connect with a green corridor. The identified development needs for PSBLP will require both previously developed land and greenfield sites. The medium and longer term impacts on biodiversity and habitats, and on

the historic environment should be changed to neutral or positive because of the policy requirements in Policy EMP 5 for effective mitigation measures to be implemented as part of the promoted development.

A Landscape and Visual Statement has previously been prepared for the site. In summary, the site and surrounding area is a landscape where commercial and industrial buildings are a common feature. The site is visually and physically connected to the A6 junction with the A421. There is dense vegetation on the edge of settlements and around more recent developments to address landscape and visual impacts. It is recommended in the Report that buildings of a similar size and scale to those in the surrounding area could be provided at the site. It should be noted that Policy EMP 5 includes policy requirements for a masterplan and design codes to be submitted with a planning application (criteria i) and for the design of the promoted development to respect local landscape priorities including views of Elstow Abbey and separation from Elstow village (criteria iii). As such, there are policy requirements to assess landscape and visual impacts at planning application stage once more detailed information is provided on the design and layout of the promoted development.

An updated Bedford Innovation Campus Indicative Masterplan Document has been prepared for the promoted development. This confirms that the site's developers and landowners will continue to work proactively with Bedford Borough Council to bring forward the development of the site for employment purposes. This includes a commitment to meet the emerging policy requirements set out by policy EMP5.

It is requested that Figure 10, which provides the supporting site location plan for Policy EMP 5, is amended to include additional details of the promoted development as contained in the Concept Masterplan in the updated Masterplan Document.

In conclusion, the Southill Estate supports the draft allocation for science and innovation park and agrees with the policy requirements for the promoted development. No changes are required to Policy EMP 5, but Figure 10 could be updated.

### *Requested Change*

No changes are required to Policy EMP 5, and the draft allocation and policy requirements should be retained.

It is requested that Figure 10 is changed to reflect the Concept Masterplan provided in the updated Bedford Innovation Campus Indicative Masterplan Document.

### **Policy DM1(S): Affordable Housing**

#### COMMENT

Policy DM1(S) sets out the policy requirements for affordable housing. The Southill Estate owns land at the Abbey Field West of Elstow site that is a draft allocation for residential development (Policy HOU 5), and land at the Pear Tree Farm Elstow site for a science and innovation park (Policy EMP 5). The sites are adjacent to one another, and there is an inter-relationship between the two developments because of the common landownership. There may need to be some flexibility towards

affordable housing in order to deliver the economic benefits associated with the science and innovation park. In addition, there is potential for a proportion of the housing to be retained specifically for employees at the science and innovation park, which could affect the overall supply of affordable housing. These issues would be addressed at masterplan and planning application stage.

No changes are required to Policy DM1(S).

### **Policy DM3(S): Housing Mix**

#### COMMENT

Policy DM3(S) seeks to ensure that a mix of house types and sizes are delivered at developments to meet identified needs. The Southill Estate owns land at the Abbey Field West of Elstow site that is a draft allocation for residential development (Policy HOU 5). Criteria ii of Policy HOU 5 also requires that a mix of house types and sizes are provided from this allocation. The promoted development would provide a mix of house types and sizes. As set out in the Southill Estate's representations to Policy DM1(S), there is potential for a proportion of the housing within this promoted development to be retained specifically for employees at the science and innovation park allocation at Pear Tree Farm. This approach would provide an additional type of housing not mentioned in Policy DM3(S). The housing mix for the promoted development at Abbey Fields West of Elstow would be determined at masterplan and planning application stage.

No changes are required to Policy DM3(S).

### **Policy DM5(S): Self Build and Custom Housebuilding**

#### COMMENT

Policy DM5(S) requires developments of +100 dwellings to include plots for self and custom build housing, with the amount subject to negotiation. It is agreed that the amount of self and custom build plots provided should be subject to negotiation and assessed on a site by site basis. The Southill Estate owns land for two draft allocation, one for residential development (Policy HOU 5) and the other for a science and innovation park (Policy EMP 5). There is an inter-relationship between the two developments, with the delivery of the economic benefits associated with the science and innovation park supported by the delivery of residential development. There may need to be some flexibility about the delivery of self and custom build plots in this case. These issues would be addressed at masterplan and planning application stage.

No changes are required to Policy DM5(S).

### **Policy DM7(S): Environmental Net Gain**

#### SUPPORT

Policy DM7(S) seeks to secure a minimum 10% net environmental gain, which is consistent with the Environment Act 2021. The national 10% biodiversity net gain requirement has not become law yet, but it is likely to be mandatory within the next year or so and would apply to those draft allocations in PSBLP that are adopted.

The Southill Estate owns two parcels of land that are identified as draft allocations in PSBLP: land at Abbey Field West of Elstow site for residential development (Policy HOU 5); and land at Pear Tree Farm Elstow for a science and innovation park (Policy EMP 5). The sites are in agricultural use. The policies for both allocations include requirements that could support net environmental gains as part of the promoted developments. For example, criteria vii of Policy HOU 5 requires an assessment of ecological impacts of the promoted development, and criteria i(d) requires the promoted development to identify opportunities to include green infrastructure and to connect to existing networks. Criteria xi of Policy EMP 5 requires the submission of a wildlife and habitat survey with mitigation and enhancement measures for the promoted development, criteria vii requires the promoted development to include a green corridor, and criteria vi requires a contribution to the Forest of Marston Vale through tree planting on the site.

It is considered that the draft allocations at Abbey Field West of Elstow and at Pear Tree Farm Elstow would contribute towards the delivery of environmental net gains. Policy DM7(S) is supported and no changes are required.

## **REPRESENTATIONS TO SUSTAINABILITY APPRAISAL REPORT**

The sustainability appraisal process for development plans tests the social, economic and environmental impacts of various plan options to help choose the most sustainable policies and allocations. Paragraph 31 of the NPPF expects development plans to be underpinned by evidence that supports and justifies policies. Paragraph 32 expects development plans to avoid significant impacts on sustainability objectives and where such impacts cannot be avoided to identify mitigation measures, with those impacts tested through the sustainability appraisal process. As set out below, it is considered that findings of the PSBLP Sustainability Appraisal for two of the preferred allocations are not robust, in that mitigation measures to address significant impacts are not taken into account in the assessment process. The Southill Estate owns two parcels of land that are identified as draft allocations in PSBLP: land at Abbey Field West of Elstow site for residential development (Policy HOU 5); and land at Pear Tree Farm Elstow for a science and innovation park (Policy EMP 5). The assessment of these two draft allocations in the SA conclude that negative effects would still arise for some sustainability topics in the medium and longer term, which cannot be correct when each policy includes requirements to effectively mitigate the impacts of the promoted developments.

### **Policy HOU5: Abbey Field, West of Elstow**

#### **OBJECT**

The assessment for Policy HOU5: Abbey Field, West of Elstow against sustainability objectives is provided at SA Appendix pg. 174 to 175. It is noted that the assessment identified a number of positive effects, which are mostly related to the location of the site within the urban area and to the delivery of additional housing. The assessment identified negative effects in the short, medium and long term for the following sustainability objectives: No.2 biodiversity; No.4 historic environment; and, No.13 access to community services and facilities. Policy HOU5 includes policy requirements to address significant impacts on a range of matters. The negative effects in the medium and longer term cannot be correct, because this implies that the mitigation measures identified in the site allocation policy would be ineffective.

Criteria i(a) of Policy HOU 5 requires the design of the promoted development to preserve the setting of heritage assets. The Heritage Impact Assessment prepared for the promoted development demonstrates that the change to the rural setting of heritage assets would result in no more than a minor adverse impact to their wider rural setting and would have no impact on the immediate setting of the assets. It is concluded in the Assessment that the impact on the wider rural setting of these designated heritage assets would amount to less than substantial harm to the significance of these assets. In addition, there is a policy requirement for the promoted development to include open space to the north and east, which would separate built development from heritage assets and retain views of those assets. Therefore, the significant effects from the promoted development on heritage assets would be effectively addressed by mitigation measures. If there are any short term impacts on heritage assets, the design and layout of the promoted development including substantial areas of open space would reduce those impacts in the medium and longer term. It is requested that the score for sustainability objective No.4 (historic environment) is changed to neutral effects in the medium and longer term.

Criteria vii of Policy HOU 5 requires an assessment of ecological impacts of the promoted development, and criteria i(d) requires the promoted development to identify opportunities to include green infrastructure and to connect to existing networks. In addition, Policy DM7 includes a policy requirement for major development to deliver a minimum 10% biodiversity net gain through enhancement of existing features or creation of new habitats. It is anticipated that the promoted development would protect and enhance the biodiversity of the site, and would deliver further enhancements through green infrastructure. Therefore, any significant effects from the promoted development on ecology would be effectively addressed by mitigation and enhancement measures. If there are any short term impacts on ecology, the delivery of green infrastructure as part of the promoted development would reduce those impacts in the medium and longer term. It is requested that the score for sustainability objective No.2 (biodiversity) is changed to positive effects in the medium and longer term.

Criteria iii of Policy HOU 5 requires connections to neighbouring areas by walking and cycling. The site is within the urban area and there are community facilities available in Elstow. There will be additional facilities delivered within the existing and planned new settlements of the South of Bedford Area. It is considered that the pedestrian and cycle connections to be delivered as part of the promoted development would enable future residents to access community facilities in the surrounding area. Pedestrian and cycle connections to the neighbouring areas. Therefore, any significant effects from the promoted development on access to community services and facilities would be effectively addressed by the delivery of pedestrian and cycle connections. It is requested that the score for sustainability objective No.13 (access to community services and facilities) is changed to positive effects in the medium and longer term.

A negative effect score would remain for sustainability objective No.9 (previously developed land). However, the identified development needs for PSBLP will require both previously developed land and greenfield sites.

The requested changes set out above would confirm that the site should continue to be identified as a preferred allocation in PSBLP.

## *Requested Change*

The following changes are requested to the assessment of Policy HOU5: Abbey Field, West of Elstow at SA Appendix pg. 174 to 175:

- The score for sustainability objective No.4 (historic environment) is changed to neutral effects in the medium and longer term.
- The score for sustainability objective No.2 (biodiversity) is changed to positive effects in the medium and longer term.
- The score for sustainability objective No.13 (access to community services and facilities) is changed to positive effects in the medium and longer term.

## **Policy EMP5: Land at Pear Tree Farm Elstow**

### OBJECT

The assessment for Policy EMP5: Land at Pear Tree Farm Elstow against sustainability objectives is provided as SA Appendix pg. 210 to 212. It is noted that the assessment identified a number of positive effects, which are mostly related to the location of the site adjacent to the urban area, good accessibility by sustainable modes of transport, and to the delivery of employment land. The assessment identified negative effects in the short, medium and long term for the following sustainability objectives: No.2 biodiversity; No.4 historic environment; and No.7 physical activity. Policy EMP 5 includes policy requirements to mitigate significant effects on a range of matters. The negative effects in the medium and longer term for biodiversity and the historic environment cannot be correct, because this implies that the mitigation measures identified in the site allocation policy would be ineffective.

Criteria ix of Policy EMP 5 includes a requirement for the promoted development to protect and enhance heritage assets and their setting. In addition, Policy EMP5 includes landscape and open space criteria for the promoted development, to protect the views of Elstow Abbey and the setting of Elstow village and separate development from heritage assets – see criteria iii and criteria iv. Criteria x requires an archaeological evaluation to be prepared for the site and submitted with a planning application for the promoted development. Therefore, the significant effects from the promoted development on heritage assets would be effectively addressed by mitigation measures. If there are any short term impacts on heritage assets, the design and layout of the promoted development including substantial areas of open space would reduce those impacts in the medium and longer term. It is requested that the score for sustainability objective No.4 (historic environment) is changed to neutral effects in the medium and longer term.

Criteria xi of Policy EMP 5 requires the submission of a wildlife and habitat survey with mitigation and enhancement measures for the promoted development, criteria vii requires the promoted development to include a green corridor, and criteria vi requires a contribution to the Forest of Marston Vale through tree planting on the site. In addition, Policy DM7 includes a policy requirement for major development to deliver a minimum 10% biodiversity net gain through enhancement of existing features or creation of new habitats. It is anticipated that the promoted development would protect and enhance the biodiversity of the site, and would deliver further enhancements as part of

the green corridor and tree planting. Therefore, any significant effects from the promoted development on ecology would be effectively addressed by mitigation and enhancement measures. If there are any short term impacts on ecology, and the delivery of biodiversity enhancements, tree planting and a green corridor as part of the promoted development would reduce those impacts in the medium and longer term. It is requested that the score for sustainability objective No.2 (biodiversity) is changed to positive effects in the medium and longer term.

The assessment of the site against sustainability objective No.7 (physical activity) is not relevant to the promoted development. It is not normally a requirement for employment sites to include recreation facilities. Although, the promoted development would provide pedestrian and cycle connections to enable active travel to and from the site, and includes a green corridor to provide informal recreation opportunities for future employees. It is requested that the score for sustainability objective No.7 (physical activity) is changed from negative effect to neutral effect.

A negative effect score would remain for sustainability objective No.9 (previously developed land). However, the identified development needs for PSBLP will require both previously developed land and greenfield sites.

The requested changes set out above would confirm that the site should continue to be identified as a preferred allocation in PSBLP.

### *Requested Change*

The following changes are requested to the assessment of Policy EMP5: Land at Pear Tree Farm Elstow at SA Appendix pg. 210 to 212:

- The score for sustainability objective No.4 (historic environment) is changed to neutral effects in the medium and longer term.
- The score for sustainability objective No.2 (biodiversity) is changed to positive effects in the medium and longer term.
- The score for sustainability objective No.7 (physical activity) is changed to neutral effects in the short, medium and longer term.

***Carter Jonas – 27th July 2022***