

Bedford Borough Local Plan 2040

Response by [REDACTED] to Pre-Submission Local Plan Consultation
July 2022



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[REDACTED]



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1.0 Introduction

- 1.1 These representations have been prepared on behalf of [REDACTED] in response to the public consultation on Bedford Borough Council's ('BBC') Pre-Submission Local Plan 2040 Consultation ('the Local Plan').
- 1.2 These representations are made having particular regard to an area of land, known as West Park Farm, located immediately south of Wilstead. A Site Location Plan identifying the extent of land (hereafter referred to as 'the Site') is enclosed at Appendix 1.
- 1.3 The Site has previously been submitted to BBC as part of the Call for Sites process, and representations were submitted to the Local Plan 2030 and previous stage of the Local Plan 2040 on behalf of the landowner, [REDACTED].
- 1.4 The response to this consultation considers the Spatial Strategy and growth south of Bedford (Policy HOU12) the key issues of housing and job growth; strategic locations for growth and site-specific allocations. Having regard to the submitted Plan and evidence base, the Local Plan as proposed is not sound as it is not justified or consistent with national policy.
- 1.5 This response includes further information in relation to the land at West Park Farm, with the enclosed illustrative Masterplan (Appendix 2) demonstrating how the land can deliver a net zero carbon development in a sustainable location, which would help to both meet local housing needs and deliver the aims of the Local Plan in accordance with the outlined growth strategies.
- 1.6 The Local Plan evidence base finds that the land at West Park Farm is a logical and appropriate location for development; indeed the LCA actively points to this location for future growth. The failure of the Local Plan to allocate the Site is not based on the proportionate evidence base accompanying the Local Plan and therefore means the Local Plan is not justified and thus unsound.
- 1.7 The Local Plan can be made sound by allocating the land at West Park Farm in accordance with the proposals set out in this submission.

2.0 Approach to Growth

Housing Needs

- 2.1 Paragraph 15 of the NPPF (2021) requires Local Plans to, inter alia, provide a framework for addressing housing needs and other economic, social, and environmental priorities.
- 2.2 Paragraph 16 states that Local Plans should be prepared with the objective of contributing to sustainable development and be prepared positively in a manner that is aspirational as well as deliverable.
- 2.3 The NPPF also requires (para 23) that the Strategic Policies of the Plan should provide a clear strategy for bringing land forward to meet objectively assessed needs in line with the presumption in favour of sustainable development (para 11), and, in doing so, allocating sufficient sites to deliver the strategic priorities of the area.
- 2.4 National Policy therefore provides a clear, positive context with a clear requirement to meet identified needs in an aspirational but deliverable fashion. Importantly, the **NPPF does not state that Plans should adopt a ‘do minimum’ approach; instead it promotes ambitious growth**, where it is carried out in a sustainable fashion.
- 2.5 Bedford Borough sits in a key location within a national area of strategic importance, being at the heart of the Oxford-Cambridge Arc (‘the Arc’). Whilst the timetable for the Local Plan does not align with that of the Arc Spatial Framework, our client supports the approach being taken by BBC of progressing the Local Plan in advance of the Arc Spatial Framework and consider it is crucial that the Plan is adopted in a timely fashion.
- 2.6 The Local Plan 2030 was adopted on the basis of an early review and was examined against the 2012 NPPF under transitional arrangements. The Local Plan 2030, therefore, whilst being relatively “young” in Local Plan terms, is quite outdated in terms of its approach to housing needs. The level of growth identified and allocated in the Local Plan was based upon historic methods for identifying housing need, and, therefore, suppresses housing need for a recently adopted Plan.
- 2.7 The Local Plan 2040 must, therefore, address this issue in addition to considering housing needs associated with the Arc.
- 2.8 The Standard Method requirement (para 4.7 of the Local Plan) meanwhile, finds the Borough’s housing need to be 1,355dpa, which the Local Plan applies across the plan period of 2020 to 2040, creating a total of 27,100 dwellings.
- 2.9 The Local Plan 2030 did not, therefore, meet the housing needs as now identified based on the Standard Method. The Inspector’s Report into the 2030 Local Plan recognised (IR para 40) that if the Standard Method had been applied in that instance, then the housing need figure of 1,280dpa would have applied.
- 2.10 The Local Plan then proposes a stepped trajectory approach to deal with housing need, with only 970 homes per annum in 2020-2025, and 1,050 between 2025-2030. There would then be a significant increase to 1,700dpa in the final 10 years of the Plan.
- 2.11 The justification for this approach is due to the over reliance upon strategic allocations which large infrastructure requirements.

-
- 2.12 This is not considered a sound approach and is effectively putting all the Council’s ‘eggs in one basket’. It is not justified by the evidence and the Local Plan.
- 2.13 In particular, the Sustainability Appraisal testing of the ‘stepped approach’ is fundamentally flawed, with the justifications given for positive scores around items such as previously developed land (see SA Appendix 8 p. 113) being conjecture. The statement that the stepped approach would have a more beneficial effect on development on previously developed land is incorrect; sites which are previously developed land can come forward irrespective of the stepped approach and the SA does not identify any previously developed land south of Bedford that benefits from the new rail stations and links. Indeed, the allocations at locations such as the Wixams are not on previously developed land but greenfield land. The SA must, therefore, be re-run with a correct assessment of the stepped approach.
- 2.14 A correct assessment of the stepped approach in the SA would identify that there are risks with being reliant upon so much growth linked to strategic infrastructure outside of the control of developers and the Council. This would in turn mean that many of the benefits may not be realised, or realised later in the plan period, pushing housing delivery outside of the plan period.
- 2.15 This is particularly evident in this area, with the still awaited deliver of the Wixams rail station. That station was due to be completed in 2015 and is now timetabled for opening in 2024.
- 2.16 Instead, the Plan should take a more balanced approach, with a reduction in numbers on some of the strategic sites and the delivery of smaller strategic allocations which can come forward earlier and increase housing delivery in the period to 2030.
- 2.17 The Local Plan is not sound, as it is not justified or effective. To make the Plan sound the trajectory should be amended. Reflecting the fact that the Local Plan may not be adopted until 2023, and thus higher delivery in 2024 (compared to the Local Plan 2030), the trajectory should be as follows:
- 2020/21- 2023/24: 970dpa
- 2024/25 – 2039/40: 1,423dpa
- 2.18 Aligned with this, new allocations will be required, and a reduction in the number of dwellings on some strategic sites may be required. These matters are dealt with below.

Plan Period

- 2.19 Turning to the matter of Plan length, [REDACTED] contends that the Plan Period should run to 2050. A period to 2040 is only 10 years beyond the existing Local Plan and is not a sufficiently long enough extension to effect real change.
- 2.20 As the Council will be aware, strategic growth and development, along with wide scale change, takes many years to deliver. Sites take a long time to plan correctly and then commence delivery, and thus a longer Plan Period should be allowed for.
- 2.21 Furthermore, by extending to 2050, this would bring the Plan in line with others in the Arc, such as the MK2050 Vision and the Oxford 2050 Plan. Given the strategic and important role that Bedford Borough plays within the Arc, **it would represent ‘good**

planning’ and a holistic approach to align the Local Plan Period with those other areas. The next review of the Local Plan would then not need to extend the Plan Period, but instead revise housing and employment growth to reflect the latest position as relevant at that time.

3.0 Spatial Strategy

- 3.1 The spatial strategy of focusing growth in the south of Bedford area (Policy HOU12) is supported by our client. However, our client contends that the approach taken to allocating sites and, in particular, the quantum of development allocated on certain sites is not justified nor consistent with national policy, for the following reasons.
- 3.2 Firstly, the Local Plan does not put dwelling numbers against allocations HOU13, HOU15, HOU16 and HOU17. The Policy must be amended to do so that there is a clear understanding and expectation as to the quantum of development that the Plan is proposing in these locations.
- 3.3 Upon review of the Stepped Trajectory Topic Paper (April 2022), numbers have been proposed against these sites as follows:
- HOU13: 500
HOU15: 300
HOU16: 1800
HOU17: 1000
- 3.4 What is not evident from the evidence base or the Local Plan, is the approximate developable areas and thus whether these are realistic densities. Upon examination of the Policies for each site, and the Figures in the Local Plan which accompany each, the only way to achieve all the Policy requirements, in particular the amount of open space and green infrastructure, would necessitate very high densities on the majority of these sites (c. 50/60+ dph).
- 3.5 There is no evidence accompanying the Local Plan which justifies this approach; the HEDNA does not identify such a high requirement for small (1-2 bedroom homes) which a high density would lead to, nor is there market evidence supporting housing demand for such a high quantum of small units in these locations.
- 3.6 This is likely to lead to future applications which either decrease the number of homes, resulting in unmet need (in terms of overall quantum and/or mix) and possibly non-delivery of key infrastructure. Alternatively, it may lead to non-delivery of green infrastructure due to pressures to deliver housing numbers.
- 3.7 The quantum for each allocation is not based on a proportionate or robust evidence base and are therefore not sound.
- 3.8 In order to make the Local Plan sound, additional allocations are therefore necessary to make up this shortfall in numbers. Doing so would have the further benefit of addressing the stepped trajectory shortcomings as set out in Section 2 of these representations.
- 3.9 The next section of these representations puts forward a case as to one such location for growth within the southern parishes, which would deliver growth in accordance with Policy HOU12, on a site which has erroneously been discounted from the site selection process.

4.0 Land at West Park Farm

- 4.1 The land at West Park Farm sits immediately south of Wilstead, as shown on the Site Location Plan enclosed at Appendix 1. The land measures c.21ha and was submitted to BBC through the Call for Sites process in 2020. Enclosed at Appendix 3 is the Council's assessment of the site contained in the Site Assessment Pro Formas.
- 4.2 The land has previously been put forward for a residential development, with the Council's assessment suggesting 525 homes. Curiously, whilst considering the site for residential development, the appraisal concludes stating that the site is not a preferred location for employment. This is a concern and suggests the site has not been correctly assessed compared to what it has been proposed for.
- 4.3 Furthermore, the assessment concludes that the site was excluded from further assessment as its location is not in accordance with the Development Strategy. Again, this is a fundamental flaw as the site location does accord with the development strategy, namely growth south of Bedford including in the parish of Wilstead.
- 4.4 Our previous representations (August 2020) set out a thorough consideration of the site against the assessment criteria, repeated below for the Inspector's benefit. Having reviewed against the updated proforma, the Council's assessment has not failed to consider these proposals. Of particular note is the response to question 3a, concerning renewable energy. As those representations evidenced (and seen below), the site is proposing a net zero carbon scheme with wind and solar. This is further evidence that the site has not been correctly assessed by the Council.
- 4.5 A full and thorough assessment of the site, carried out in accordance with the full evidence base and the proposals as put forward on behalf of the landowner, would find that the site should be allocated. The Local Plan is, therefore, unsound as it is not justified. The Local Plan should be modified to allocate the land at West Park Farm for housing and renewable energy development. This is necessary to both respond to the evidence base, and to make up the shortfall of housing that will result from the correct assessment and planning of the other south of Bedford sites, as set out in Section 3 of these representations.
- 4.6 As set out in our previous submission, a more detailed land use assessment of the site and the enclosed illustrative masterplan (Appendix 2) demonstrates **how the site could provide the following net zero carbon development**¹:
- 13.6 hectares of residential (511 dwellings at around 37.5 dph - 1.9 hectares is shown as 'multi-generational housing')
 - 5.5 hectares of solar, a large scale (potentially 6MW) wind turbine and ground sourced heating infrastructure to supply homes with hot water

¹ Definition of Next Zero Carbon for operational energy: "When the amount of carbon emissions associated with the building's operational energy on an annual basis is zero or negative. A net zero carbon building is highly energy efficient and powered from on-site and/or off-site renewable energy sources, with any remaining carbon balance offset". Source: Government Property Agency, Net Zero and Sustainability Design Guide – Net Zero Annex, August 2020

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- 1 hectare school site (single form entry)
 - 2 hectares playing fields
 - 3.3 hectares of woodland in addition to woodland buffer planting
 - Allotments
 - Community Hub
 - Retail/café with EV charging
 - A new roundabout on the A6 at the Chapel End Road junction
 - A new cycle/footpath connection into Wilstead along the 'old' route of the A6
- 4.7 The proposals are a **comprehensive approach to delivery of a net zero carbon, highly sustainable development within the southern parish of Wilstead**. The proposed development would meet the requirements of national policy, particularly in relation to climate change, and would be an exemplar development that would assist the Council as a **flagship scheme** to lead the way for other developments to follow, so assisting the Borough in moving towards becoming a net zero carbon Borough.
- 4.8 The Site is in a **single ownership, is available and is deliverable**, being actively promoted by the landowner. It is not reliant upon any third parties and would be capable of “consuming its own smoke” in terms of infrastructure. The Site could, therefore, be delivered early within the plan period.
- 4.9 The proposed development has several key benefits that meet the aims and vision of both the Local Plan, and national policy. In addition to being a **net zero carbon development with renewable energy and heat** alongside development, it would **deliver multi-generational housing and a new school**, as well as **major highway improvements**. The ability to connect to the settlement of Wilstead with a new cycle/footpath connection enhances the sustainability of the Site, and enhanced by the topography, it is in an excellent location to connect to the new Wixams station, the proposed East-West rail station north of Stewartby, and the nearby proposed Bedford Business Park. The homes would therefore be in an excellent location by **providing opportunities for people to live and work locally and reduce reliance upon the private car**.
- 4.10 The Site Proforma confirms that **the land is adjoining a defined settlement area**, and that there are no major issues that would preclude the allocation of the Site. Turning to more detailed aspects of the Council’s assessment and, in turn, the evidence base for this Local Plan, there are a number of positive matters which further point towards the case for allocating this Site.

Highways and Access

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- 4.11 The Bedford Borough Local Plan Transport Access Assessments document² (site ref 686) finds that the proposed highway mitigation is possible and scores the Site with an amber rating. It does not highlight any technical issues with the Site and, those matters that score less well (namely bus stop and cycle connectivity) would be addressed as part of the development. The subsequent proforma assessment (Appendix 3) does not identify any highway or access constraints that cannot be mitigated against and does not raise any objections to the mitigation proposed in the submission.
- 4.12 The highway summary of the Site correctly notes that a development of this scale would have the ability to either provide its own bus stop or deliver a flexible public transport service. Thus, the scoring of the Site regarding public transport would improve and, given the proximity to both the Wixams rail station and new East-West rail station near Stewartby and the proposed Bedford Business Park, it would be realistic for a shuttle bus service (or similar) to connect this development, local villages, and those locations.
- 4.13 Turning to cycle, the layout at Appendix 2 shows how the Site would connect to Wilstead, with a new cycle connection along the former route of the A6. The topography in this area is relatively flat, and thus conducive to cycling, and therefore the Site is one that would be a realistic cycling option for residents to choose to cycle.
- 4.14 Finally, the delivery of a **new roundabout at the Chapel End Road/A6 junction** (as shown in Appendix 4) **would deliver wider highway benefits**. Presently this junction is one which has experienced several accidents over recent years, a risk that may be increased given future development pressures in the locality. The delivery of a new roundabout would have **considerable benefits in terms of highway safety**, whilst not resulting in congestion issues on the A6 given the distance to other junctions.

Heritage

- 4.15 The summary Site Proforma refers to potential harm to heritage assets. However, upon examination of the Historic Environment Assessments³ that forms part of the evidence base, the assessment finds that there are no known heritage assets, and only that a “pre-determination evaluation will be required”.
- 4.16 The document also confirms that there is unlikely to be an impact on Listed Buildings. The concluding comments in the assessment, that, in effect, find that there ‘may or may not be’ a harmful impact on heritage assets or their setting is misleading, if not completely incorrect.
- 4.17 There is, therefore, **no reason to find that the Site should be excluded on heritage grounds**. This is in direct contrast to other allocated sites, in particular HOU13 with several heritage assets (not just buildings but features such as ridge and furrow) identified as requiring mitigation within the Policy wording.

Landscape

² Link in paragraph 5 of the Site Assessment Pro Formas June 2021

³ Link in paragraph 5 of the Site Assessment Pro Formas June 2021

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- 4.18 The Site sits within the East Marston Clay Vale (5E) as identified in the Landscape Character Assessment (2014, updated 2020) ('the LCA'). The LCA finds that this area has a number of urban and built form influences, namely:
- Large scale industrial features such as distribution warehouses
 - Roads, such as the A6, with a strong visual and audible presence
 - The urban edge of Bedford and development along the A6 associated with Wilstead bringing urban fringe characteristics.
- 4.19 The vale is low lying, and the Site itself sits within this low topography. The Site benefits from the change in levels to the east and south, and the Ancient Woodland to the east of the Site. This change in topography, along with the woodland, **provides a sense of enclosure for the Site**, separating it from the changing character further south and **preventing the feeling of encroachment into the wider countryside**.
- 4.20 The LCA in particular identifies that **the settlement edge expansion of Wilstead is a potential future change to the landscape⁴**, thus acknowledging that growth in this area is something the landscape is likely to accommodate. Moreover, the LCA identifies (para SE.1.42 p.120) that **this future growth must prevent linear expansion and the merger of villages**, with specific reference to the potential for the merger of Wixams with Wilstead.
- 4.21 This means that, based on the LCA, **the only possible location for growth of Wilstead is to the south**. Any growth to the north or west would lead to a potential merger with Wixams, whilst to the east there is the risk of coalescence with Littleworth.
- 4.22 Plainly, therefore, **allocating the Site for development would be a logical approach considering the landscape evidence base** for the Local Plan.

Summary

- 4.23 The land at West Park Farm, south of Wilstead, is being actively promoted for a **net zero carbon development of some 515 homes, with a school, multi-generational housing, transport infrastructure and large-scale renewable energy and heat**.
- 4.24 The Local Plan **evidence base finds that this location is a logical and appropriate location for development**; indeed the LCA actively points to this location (by process of elimination) for future growth. **The Site would accord with the emerging development strategy for BBC and would deliver housing in a sustainable location, together with renewable energy, as advocated in the NPPF**.
- 4.25 The land at West Park Farm should therefore be allocated for development (housing and renewable energy) within the Local Plan.

⁴ Page 119, Landscape Character Assessment (2014, updated 2020)

Appendix 1: Site Location Plan

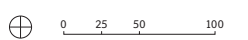


 Site boundary



Land South of Wilstead
Site Boundary

1-129_101 | 03-09-2021 | 1:5,000@A3



built form
resource



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Appendix 2: Illustrative Masterplan



- | | | | | | |
|--|----------------------------|--|------------------------------|--|---------------------------------|
| | Site boundary | | Residential | | Street trees |
| | Village | | Multi-generational housing | | Allotments |
| | Arable and pasture | | Community Hub | | Woodland planting |
| | Woodland/trees | | Retail/café with EV charging | | Species rich grassland |
| | Public footpath | | School | | Retention basin |
| | Proposed principal access | | Solar photovoltaic array | | Indicative street pattern |
| | Proposed pedestrian access | | Public Green | | Proposed pedestrian/cycle route |
| | | | Playing fields | | |

AVPromotion
 Land South of Wilstead
 Concept Masterplan

1-129_100.A | 03-09-2021 | 1:5,000@A3

0 25 50 100



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Appendix 3: BBC Site Assessment Pro Forma

ID
686

a) Address of site
Land at West Park Farm
Adjoining Wilstead MK45 3RD
Please see attached drawing:
ref APL046-1. c.21 ha.

a) What is the primary use you propose for the site?

Housing

Site size (ha)

19.94

The number of dwellings the site could provide.

525 Dwellings

Site size threshold

Above

The gross floor space that the site could provide.

Overriding constraint?

Site not in accordance with the emerging development strategy

Stage 1 conclusion

Exclude from further assessment

Stage 2 Assessment of suitability, availability & achievability

Stage 2 conclusion

Stage 3 Assessment against sustainability objectives

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

? The site is within or adjoining a defined settlement policy area or within the built form of a small settlement.

1b. Accessible on foot to a food store?

x A site accessibility score of 4 is recorded where 4 is 21 – 30 minutes' walk.

1c. Accessible on foot to a primary school?

x A site accessibility score of 4 is recorded where 4 is 21 – 30 minutes' walk.

1d. Accessible on foot or by bus to a major employer?

xx There is no public transport within 10 minutes' walk to enable access to a major employer

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

+ The site is not within or adjoining the air quality management area.

2a. Within or adjoining site of nature conservation importance

x The site is within or adjoining a site of nature conservation importance

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

xx Protected species recorded on the site

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

? Uncertain or insufficient information

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

0 The site is not within or adjoining the green infrastructure opportunity network or the impact of the proposal is neutral.

2e. Likely to impact on an area currently providing ecosystem services.

+ Opportunity area for 3 or more ecosystem services covers less than 25% of the site.

3a. Proposing a renewable energy scheme or extra energy efficiency standards?

0 No renewable energy generation scheme included and efficiency standards that meet normal standards.

3b. Within or adjoining the urban area, a defined settlement policy area or the built form of a small settlement?

? The site is within or adjoining a defined settlement policy area or within the built form of a small settlement.

3c. Accessible on foot to a food store?

x A site accessibility score of 4 is recorded where 4 is 21 – 30 minutes' walk

3d. Accessible on foot to a primary school?

x A site accessibility score of 4 is recorded where 4 is 21 – 30 minutes' walk.

3e. Accessible on foot or by bus to a major employer?

xx There is no public transport within 10 minutes' walk to enable access to a major employer.

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

x The proposal has the potential to cause harm to heritage assets. This harm may range from low to high. There may be options to avoid, reduce or mitigate this harm and where sites have not been ruled out altogether for other reasons, further assessment will be undertaken to more fully explore impacts on significance and options for harm reduction and mitigation. This further assessment may ultimately lead to the conclusion that the site should not be allocated.

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

+ Proposal includes permanent economic and employment opportunities.

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

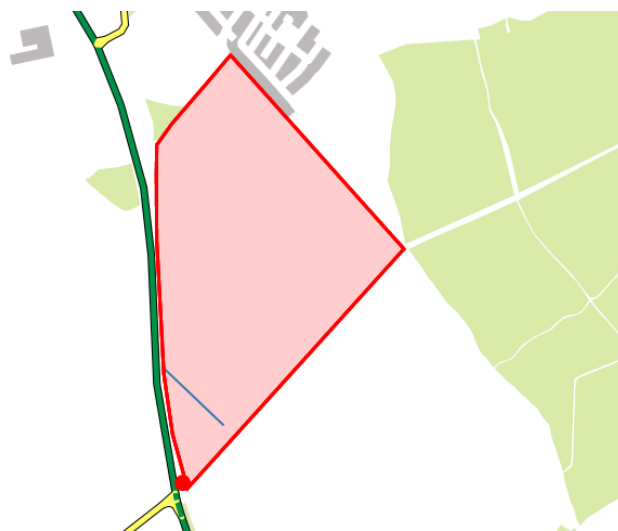
0 Proposal does not include a main town centre use.

7a. Within 400m of an existing open space or proposing open space within it?

x The proposal does not include and is not within 400m walking distance of a publicly accessible open space.

7b. Within 800m of a sports facility or proposing a sports facility within it?

x The proposal does not include and is not within 800m of a publicly accessible sports facility



8a. Likely to have a significant adverse impact on the surrounding landscape?

? It is uncertain what effect the proposal is likely to have on the landscape / more information is required.

8b. Within the existing settlement form?

+ The site adjoins a defined settlement policy area or the built form of a small settlement.

9a. On previously developed land?

x The site is not previously developed land as defined in the NPPF.

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

? The classification of the site is not known or it is not clear whether is classified as grade 3a or 3b.

10a. Within a groundwater source protection zone?

+ The site is not located in a source protection zone.

11a. At risk of flooding?

+ The site is within flood zone 1 (areas that have been shown to be at less than 0.1% chance of flooding in any year).

12a. Likely to provide a mix of housing, including affordable housing?

+ The site is likely to provide a mix of housing and include affordable housing.

12b. Able to address a particular housing need?

x The development will not meet identified needs eg elderly, care, travellers.

13a. Within 800m of a facility where cultural or social activities can be accessed?

x The site is not within 800m of a facility where cultural or social activities can be accessed.

14a. Likely to encourage social cohesion?

0 Neutral.

14b. Likely to help make the area safer? +

+ The development is likely to increase public surveillance or increase activity.

15a. Within or adjoining the urban area, a defined settlement policy area or the built form of a small settlement?

? The site is within or adjoining a defined settlement policy area or within the built form of a small settlement.

15b. Accessible on foot to a food store?

x A site accessibility score of 4 is recorded where 4 is 21 - 30 minutes' walk.

15c. Accessible on foot to a primary school?

x A site accessibility score of 4 is recorded where 4 is 21 - 30 minutes' walk.

15d. Accessible on foot or by bus to a major employer?

xx There is no public transport within 10 minutes' walk to enable access to a major employer.

15e. Connect highway without constraint?

x Serious access constraint wider impacts

15f. Highway or junction capacity issues

? Potential capacity problem requiring mitigation

Stage 4 Assessment against additional constraints and other considerations**Highway comments**

While the A6 experiences little to no traffic congestion in the site area, the nearby Chapel End Road and Church End Road both have moderate congestion during peak hours. No formal cycling provision in the area. The closest bus stop is 1.2km south of the site on the A6, however there is no pedestrian access, so effectively there is no public transport provision. The proposed access to the site would, if possible, be taken directly from the A6, requiring significant works. The applicant suggests that the scheme could provide a strategic expansion of Wilstead delivering a new roundabout on A6 to improve the junction at Chapel End Road. Realignment of access from Wilstead through the site to improve access at Luton Road/A6 junction is also suggested. The site would benefit from it's own bus stop or flexible public transport service.

Contaminated Land**Mineral Safeguarding Area**

Site does not fall within the boundary of a MSA.

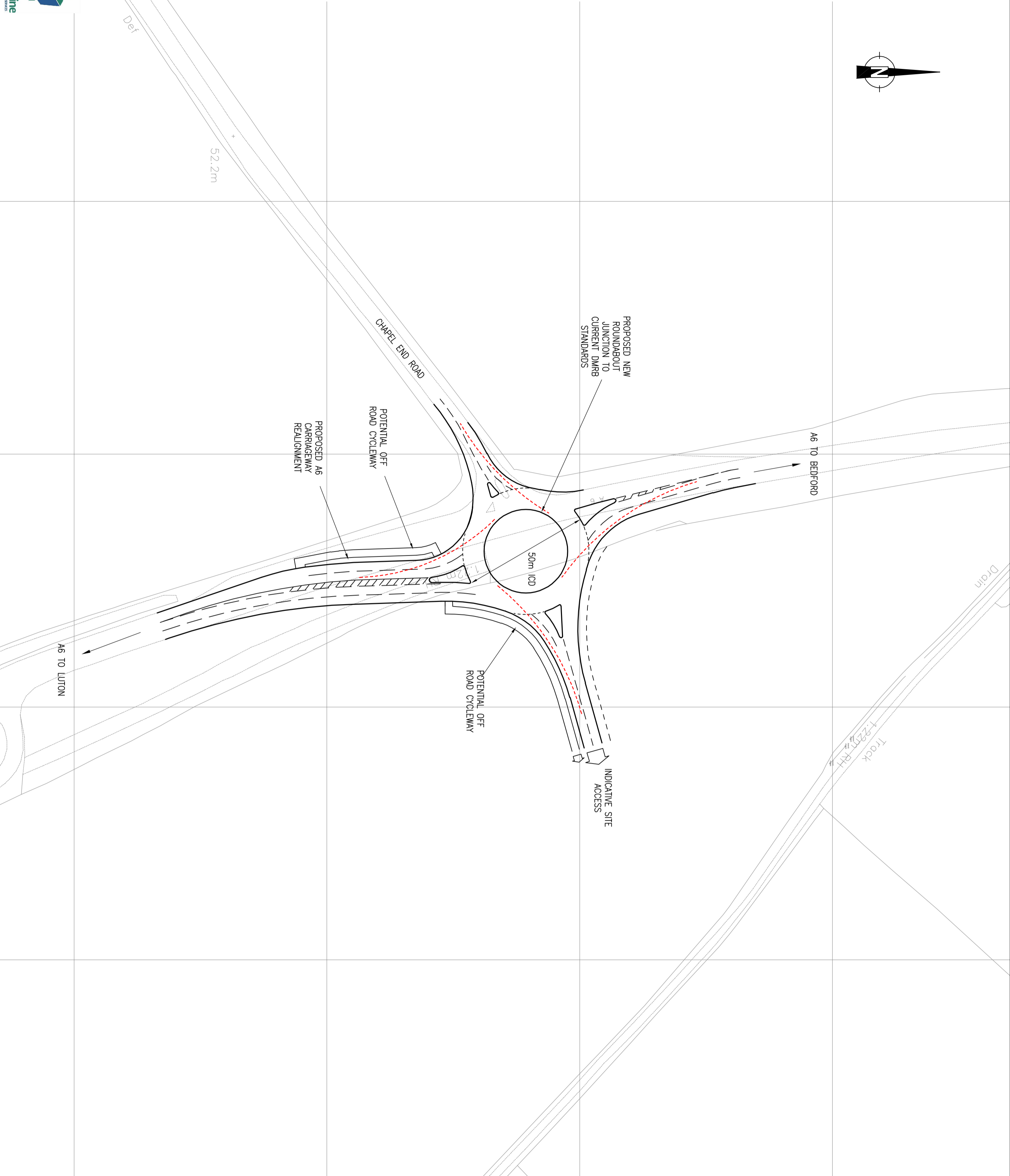
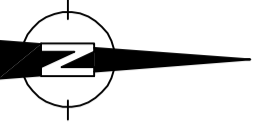
Environmental Health notes

noise from A6 road

Site assessment conclusions

The site has been excluded from further assessment at Stage 1 because its location is not in accordance with the development strategy. This is not a preferred location for an employment site as it does not relate well to existing settlements and it would be intrusive.

Appendix 4: Proposed new roundabout at Chapel End Road/A6 junction



Rev	Description	Dwn	Chk	Date
REVISIONS				
	Preliminary Issue		Submitted for S104	
	Planning Issue		Issued for Tender	
	Submitted for S38		Issued for Construction	
	Submitted for S278		As Built	

DRAWING STATUS

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JOB TITLE
 LAND SOUTH OF WILSTEAD
 AT WEST PARK FARM

DRAWING TITLE
 INDICATIVE ACCESS ARRANGEMENTS
 TO/FROM A6

DATE	BY	CHKD	SCALE	EST. ORDNANCE
AUG '21	JGP	SMA	1:1000	© A2
DRAWING No. 6755.001	REV	SCALE	1:1000	© A2

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