

**Bedford Borough Call for Sites  
Supporting Statement**

**Bedford River Valley Park  
Enabling Development**

**August 2020**



**Issue**

Submission

**Statement prepared by**

RG

**Reviewed by**

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**Job reference**

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1. This call for sites submission on behalf of the landowners, Bedford Borough Council Estates, Connolly Foundation, Forest of Marston Vale, Peter Bennie Ltd, Southill Estate and Tarmac Trading Ltd relates to the Bedford River Valley Park Enabling Development, which is an existing allocation for mixed-use development under Policy AD23 of the Allocations and Designations Plan (ADLP) (2013). The purpose of these representations are to put forward amendments to the policy for the site to reflect various changes in circumstances since its adoption relating to both site specific matters and wider economic and social transitions, including to the planning policy context of the wider area, which has moved on considerably since the original allocation was adopted, particularly in respect of the need for new housing in the Borough.
2. As will be explained below and in the accompanying "Vision" for the site that is to be submitted in response to the parallel Issues and Options consultation, the promoters of the land consider there is now a clear case for residential-led mixed use development, which would make both a meaningful contribution to the Council's housing requirement and would generate the funds necessary to enable the delivery of the watersports lake, which will be a hugely beneficial leisure facility for the residents of the Borough to enjoy, as already acknowledged by its existing allocation.
3. It is considered that these changes are best be dealt with through the inclusion of a new policy for the site in the Local Plan Review, superseding that in the ADLP and setting out both an updated vision for the scheme and overall approach to the enabling development, to include delivering an appropriate level of housing. This would provide greater certainty for the landowners and the promoters of the scheme, in turn ensuring that the watersports lake can be delivered achieving the significant benefits to residents of the Borough.
4. Representations will also be submitted in response to the Issues and Options consultation on the same points, along with a Vision document outlining an updated concept for the overall scheme.
5. Policy AD23 in the ADLP currently allocates land at Bedford River Valley Park for a mixed-use development. The purpose of this allocation is to act as 'enabling development' which will generate sufficient funds to deliver the water sports lake and other leisure opportunities which are an integral part of the Bedford River Valley Park. Planning permission for the water sports lake was granted in 2006 (LPA Ref: BC/CM/2003/33). The planning permission was subsequently implemented by a material commencement and remains extant in perpetuity.
6. The benefits that the watersports lake would bring both locally and regionally as an integral part of the wider Bedford River Valley Park are acknowledged in the supporting text to Policy AD23 and were also recognised by the Inspector in his report on the ADLP (See para. 115) in concluding that aspect of the Plan was sound.
7. Policy AD23 established a mix of uses that would generally be considered appropriate as part of this enabling development, including, employment, leisure, continuing care retirement community and education, albeit the final make-up of these was always envisaged to be dictated by the viability of the scheme, as was recognised in the Inspectors' Report on the ADLP (Para. 118).
8. A significant amount of time has elapsed since the early vision for the enabling development was conceived. Over this period the costs of delivering the watersports lake have increased due the amount of excavation under existing and amended minerals consents at the site having reduced leaving more material to be removed to create the full lake and as further contamination investigation has revealed a larger

amount of remediation is request, whilst demand for the uses set out in Policy AD23 has not.

9. Specifically, there is not considered to be the demand for the circa 12 ha of R&D-related office space, which at typical out-of-town densities for office space could equate to circa 1.5 million square feet of new space, that was shown on the indicative masterplan for the site. Given the existing level of take-up within Bedford, and the competition presented by Milton Keynes, it is highly unlikely that this level of new build office space would ever be viable and the impact of Covid-19 on working practices is only likely to further that with a rationalising of office space likely and an increase in people working from home in the future.
10. The indicative masterplan also indicates circa 8.2 ha of land for a retirement village. However, over the past ten years, requirement for developers of retirement living have changed due to changes in funding for older person's care. Developments are now generally smaller, with retirement schemes being on sites of a maximum of 5 acres, and offering relatively dense flatted living with communal areas, landscaped gardens and indoor health and leisure facilities such as gyms and spas. There have also been a number of recently permitted care schemes around Bedford meaning demand is being satisfied elsewhere in the Borough. This size of land is not requirement by the market therefore.
11. This all raises questions over the deliverability of the enabling scheme in its current format.
12. The benefits to residents of the Borough of providing a watersports lake in this location as part of a substantial area of multi-function green infrastructure remain as compelling today as they were when the idea was first conceived. In fact, as a consequence of the social restrictions brought about by the Covid-19 pandemic, the case for providing high quality outdoor leisure and recreation opportunities within easy access of our towns and cities has never been greater.
13. The planning policy context has also moved on since the site was allocated. It is likely that the Local Plan Review will have to plan for an unprecedented level of housing growth in the Borough with the annual local housing need requirement under the Government's updated Standard Method that is currently out to consultation, some 1,153 dwellings per annum. This is a significant increase over the current Local Plan housing target of 970 dwellings per annum. Consequently, a new spatial strategy will need to be adopted and implemented, along with a substantial amount of new land allocated for housing. Separate representations are being submitted in response to the Issues and Options consultation and the spatial strategy options presented within it.
14. The site itself is eminently capable of accommodating residential-led mixed-use development, as is illustrated on the enclosed Concept Plan. The Vision document (To be submitted in response to the Issues & Options consultation) for the watersports lake and enabling development articulates in greater detail how it could be developed with a high end, attractive residential scheme set within the attractive confines of the circa 800 ha River Valley Park landscape, providing a quality, contemporary residential environment based on sustainable design principles. An assessment of site constraints and a land budget exercise have informed the Concept Plan and it is considered that the site would be capable of accommodating circa 700 – 850 ha dwellings based on an assumed low – medium density range.
15. The Concept Plan also promotes accompanying uses alongside residential development at the site, including a primary school, care home, local centre and a

clubhouse type facility serving both the watersports lake and residents of the new homes. These would help create a new sustainable community centred around the watersports lake with the day to day provisions residents would require without the need to travel in the car.

16. Given the likely transition to a higher trend of home-working as a consequence of the Covid-19 pandemic, the dwellings at the site would be designed with this in mind, incorporating home offices and fibre broadband.
17. The principle of the site being developed has already been established through its allocation for enabling development. Whilst beyond the urban area of Bedford, the site is well positioned to take advantage of the services and amenities contained in the town, particularly those on its eastern edge and would be very well served in this respect.
18. The site is in close proximity to the A421 and therefore provides excellent links further afield. In terms of promoting alternative modes of transport, there are a number of existing bus stops just to the south of the site on Bedford Road which serves route 73 between Biggleswade and Bedford. Furthermore, there is scope to provide pedestrian and cycle links to the north of the site and connect to the existing Public Right of Way and Sustrans network in this area. This would provide convenient pedestrian and cycle access into the main part of Bedford and the raft of service and amenities contained therein.
19. The site does not exhibit any overriding technical constraints that would preclude residential development. Substantial work has already been undertaken in researching the site through a number of technical reports and studies that informed the allocation for enabling development first time around. Obvious constraints that need considering in relation to a residential use are flood risk and traffic generation, the part of the site where the water sports lake would be located is situated within Flood Zone 3, however, the remainder of the site is comfortably located within Flood Zone 1. There is ample scope to ensure any residential use is sufficiently distanced from the area's most at risk from flooding and hydraulic modelling at the site has been completed to inform this conclusion.
20. In terms of traffic generation, it is not considered that a residential use at the site will result in a significant uplift in traffic when factoring in the already allocated uses. Additional work relating to traffic generation would be undertaken as part of any future planning application, however, in the context of the already allocated development traffic generation is not considered an overriding constraint.
21. A further constraint is the setting and significance of Octagon House, a Grade II Listed Building, which is located on the site. This requires careful consideration, however, there is ample scope to ensure this valuable asset is protected and in fact a residential use at the site or its use as a future clubhouse type facility represents an opportunity to reflect the design of this Listed Building in the built form created, thus establishing an intriguing connection with the local area and contributing towards a 'sense of place' and also preserving it through ensuring it continues in active use.
22. Given the undeveloped nature of the site there is also a possibility of encountering features of biodiversity interest, although much of the site is currently arable farmland so the likelihood of identifying biodiversity interest is curtailed somewhat. In any case, biodiversity and landscaping will form an integral part of any residential use at the site and careful consideration will be given to how any identified impacts on biodiversity can be mitigated or offset as appropriate.

23. In conclusion, the Local Plan Review presents an opportunity to refresh the policy approach to the Bedford River Valley Park Enabling Development by way of an updated policy. The inclusion of residential uses in the 'enabling development' is critical to unlocking the viability of the scheme and delivering the water sports lake and other leisure opportunities. The site is capable of accommodating residential development and there are no overriding constraints precluding this type of development. The addition of a residential use will secure the delivery of the watersports lake and other leisure opportunities which will be a feature of significant amenity value for local people and which will also create employment opportunities and attract inward investment. The delivery of additional dwellings will also contribute towards the Council's challenging housing target and will provide a greater mix of dwellings, including affordable ones.



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