Phillips Planning Services Ltd.
Town Planning and Development Consultants

BEDFORD BUSINESS PARK

LAND OFF BROADMEAD ROAD AND MANOR ROAD SOUTH OF BEDFORD

LOCAL PLAN CALL FOR SITES SUPPORTING STATEMENT

PROPOSED ALLOCATION OF LAND FOR MIXED B1, B2 & B8 DEVELOPMENT

AUGUST 2020

1.0 INTRODUCTION

1.1 This statement has been prepared in support of the submission by Cloud Wing UK limited which seeks the allocation of land at Kempston Hardwick, off Broadmead Road and Manor Lane south of Bedford for mixed B1, B2 and B8 development and so creating a new high-quality business park at the centre of the Oxford to Cambridge Arc.

1.2 It is set out as follows:

2.0 The Site
3.0 Background
4.0 The Case for Allocation
5.0 Ownership & Deliverability
6.0 Conclusions

1.3 The statement should be read in conjunction with and provides additional information to that set out in the main 'Call for Sites' response form.

1.4 Where necessary reference is also made to various accompany plans and supporting technical documents.

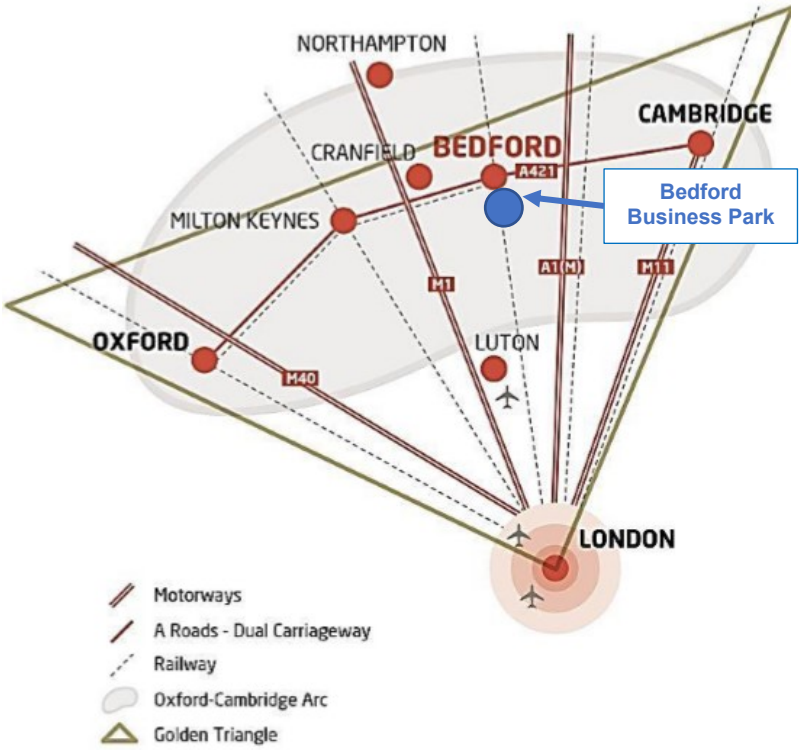
2.0 THE SITE

2.1 The site is comprised of the land and buildings at the former Kempston Hardwick Brickworks and some agricultural land south of this at Broadmead Road approximately 4 miles (7 km) south-west of Bedford between the A421 and B530.

2.2 Kempston Hardwick railway station is located centrally to the site. This and the regular bus service which runs past and through the site on the B530 and Broadmead Road provide good public transport links into Bedford and Milton Keynes.

2.3 Bedford is a prime location for employment growth. The current local plan notes that about half of the UK's population is within a two-hour drive and that London is just over half an hour away by train. There are five airports within easy reach of Bedford by car and public transport.

2.4 As a result of the planned improvements to east west transport infrastructure (east west rail and the A421 expressway) the area is enjoying increasingly stronger links with Oxford and Cambridge.



Extract from page 12 of the Adopted Local Plan

2.5 The current plan defines what it terms the Golden Triangle within which Bedford sits centrally. Figure 1 from adopted plan is reproduced above.

2.6 Given this context the National Infrastructure Commissions (NIC) report, 'Partnering for Prosperity' (17 November 2017) includes strong recommendations for growth in and around Bedford, particularly to the south associated with key road and rail corridors when discussing the employment needs in the corridor the NIC report advises:

> *"…..the area could support around **335,000 new jobs to 2050**, increasing economic output by around £85bn per annum (2011 prices). However, by meeting future needs and removing the constraints to growth arising from the area's housing shortage the area could sustain a **transformational level of growth, supporting around 1.1m new jobs** and increasing economic output by £163bn per annum*." (Page 25)

2.7 When discussing locational requirements for the new employment growth that is considered vital to support the recommendations for one million new homes in the corridor to 2050 the report states that the east-west rail upgrade should:

> *"……play a key role in tackling the arc's housing crisis, unlocking major new development locations and enabling **transformational growth around existing towns and cities**."* (Page 9)

2.8 Also, on page 9 the report advocates exploitation of the route to realise development opportunities including:

> *"……..major urban extensions – for example, between Oxford and Milton Keynes, and between Bedford and Cambridge……; …….. **unlocking growth in and around Bedford, and focusing development on a small number of key nodes in the Marston Vale.**"*

2.9 The report also comments that the key opportunities for growth over the next 30 years could include:

> *"**concentrated growth in the Marston Vale between Milton Keynes and Bedford**, focused around a few key rail nodes in the area, and providing the critical mass to expand local services; and*

*…**major development around Bedford**, supported through the introduction of East West Rail services and the wider connections that exist via the Midland Mainline;"* (Page 36)

2.10 The NIC's report was then endorsed by the Chancellor of the Exchequer in his autumn budget and alongside the budget speech, the government published a paper entitled "Helping the Cambridge, Milton Keynes and Oxford corridor reach its potential".

2.11 As will be readily appreciated, the site is located adjacent to key transport nodes, (railway stations and the A421 expressway) and within the Marston Vale, south of Bedford. In location terms therefore it is difficult to envisage a site more directly in accordance with and so supporting the vision of the NIC than this site.

2.12 It comprises just over 221 hectares of mixed Brownfield land at the former Kempston Hardwick Brickworks and agricultural land to the south off Broadmead Road. The former brickworks closed as a result of changes to UK air quality standards which meant that further clay extraction and firing for brickmaking was no longer viable. The agricultural land is of reasonable grade (84% 3b and 12% 3a) but not the best and most versatile. It has been farmed for arable crops over recent years.

2.13 To the north the site is bound by the A421. To the west of the northern section is an area of existing commercial development accommodating primarily large-scale storage and distribution uses.

Aerial view of the site

2.14 To the east of the northern section are commercial uses including the Supreme Concrete operation off Ampthill Road, Ampthill Road itself and large flooded clay pits. Whilst there are no heritage assets within the site but there is a scheduled monument (Kempston Hardwick moated site) to south east of the former brickworks adjacent to Manor Road. There is a row of residential properties on the north side of Manor Road which back onto the former Brickworks section of the site. Engagement has taken place with the Manor Lane residents who are broadly supportive of the proposals and the benefits that they could bring to the environment within Manor Lane.

2.15 South of Manor Road the site is bound to the west by agricultural land with some small pockets of residential. To the west of the site is principally intensively managed agricultural land. Bordering the site to the north-west is commercial land with again the Ampthill Road to the east with former clay pits Quest Pit) to the east of this.

2.16 The pits which were excavated when the area had functioning brickworks. These, and surrounding area which includes part of the proposed development site, comprise part of a County Wildlife Site. Coronation Business Park also lies to the east of the site.

2.17 To the south is the brownfield Stewartby Brickworks site allocated in the current local plan for 1,000 new homes and the village of Stewartby.

3.0 BACKGROUND

3.1 The site broadly comprises three linked areas of land, the former Kempston Hardwick Brickworks (north of Manor Road), an agricultural area south of Manor Road and a smaller agricultural area west of the railway line adjacent to Broadmead Road.

3.2 The former brickworks and the land south of Manor Road are the subject of historic minerals planning permissions for the extraction of Oxford Clay used in brickmaking.

3.3 A comprehensive outline planning application was submitted to the Council at the end of 2018 (reference 18/02940/EIA) proposing:

- New businesses, industrial premises and warehouses totalling up to 780,400 square meters (8.4 million square feet) of new floorspace
- A broad mix of B1 (20%), B2 (40%) and B8 (40%)
- Associated ancillary service uses (A1, A3, A4 and A5).
- Associated infrastructure connecting the site internally and to access points as well as new public landscaping.

3.4 The application was supported by a suite of technical documents, a master plan and parameter plans as follows:

Plans

- 1325-C-113 Rev D Red Line Boundary (Site Location Plan)
- 1325-C-127 Rev G Site Layout
- 1325-C-129 Rev B Height Parameters Plan
- 1325-C-130 Rev A Access & Circulation Parameters Plan
- 1325-C-131 Rev A Landscape & Open Space Parameters Plan
- 1325-C-132 Land Use Parameters Plan
- 1325-C-135 Illustrative Layout (Masterplan)
- 183758/A/08.1 Rev A Ampthill Road Roundabout

- 183758/A/08.5 Rev A Broadmead Road Re-Alignment
- 183758/A/08.6 Rev A Woburn Road Roundabout

Documents

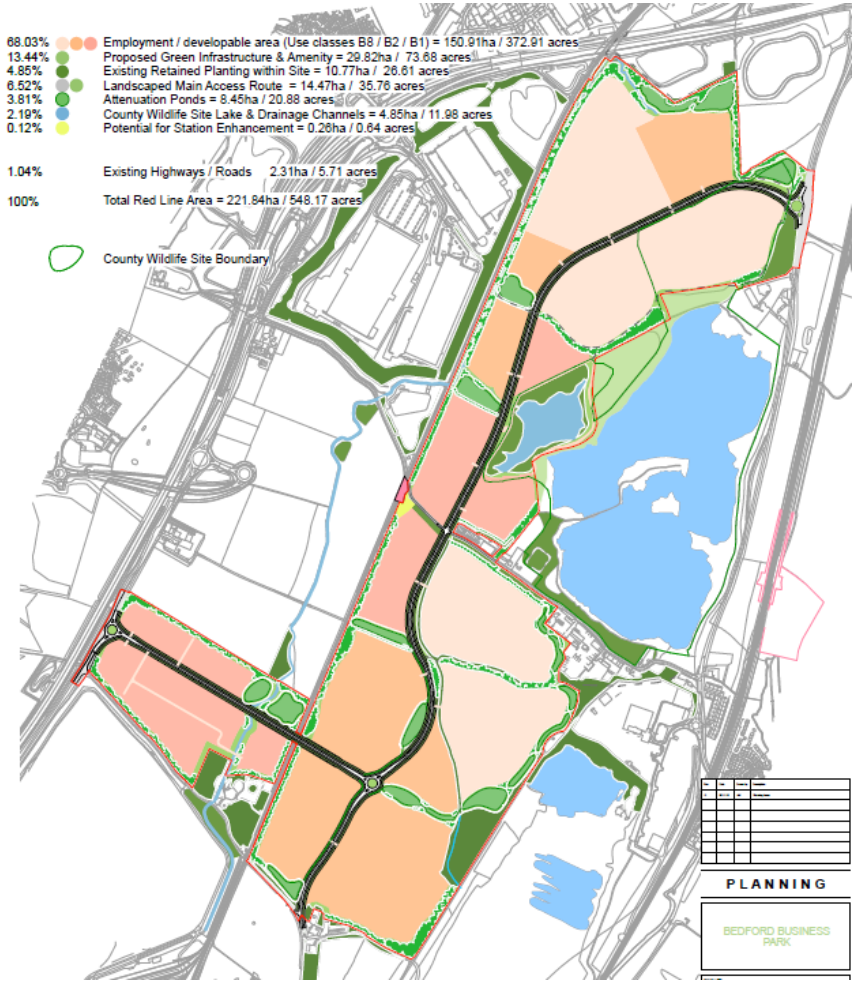
- Environmental Statement Non-Technical Summary
- Environmental Statement Volume I: Main Report
- Environmental Statement Volume III: Appendices
- Planning Statement
- Design & Access Statement
- Market Assessment Report
- Mineral Resource Assessment
- Transport Assessment
- Travel Plan
- Site Waste Management Plan
- Operational Waste Management Plan
- Energy and Sustainability Statement
- Agricultural Land Classification

3.5 These are all available to view on the Council website using the application reference above.

3.6 Following the submission the applicant team have engaged with various consultees to address comments arising. Key matters which have been addressed include, ensuring that the site will deliver 30% tree canopy cover for the Forest of Marston Vale, a net Biodiversity gain and appropriate offset distances to the adjacent Scheduled Ancient Monument.

3.7 Comments from Bedford Borough Council's Highways Team are still awaited. At the time of writing the only known outstanding matter remain ongoing discussions with Highways England regarding agreement to an appropriate S106 package that will satisfactorily mitigate the traffic impacts of the development on the strategic highway network. It has been agreed that some mitigation is required at Junction 13 of the M1 and at the A421 / A6 junction south of Bedford. It is the scale and nature of the mitigation is currently being discussed.

3.8 In summary the application submission has demonstrated that subject to final agreement of highway mitigation proposals there are no technical constraints to the development and so delivery of the site.



Indicative Site Master Plan

Indicative Site Layout

4.0 THE CASE FOR ALLOCATION

Principle & Need

4.1 The site can deliver a highly sustainable development which would provide approximately 15,000 new jobs (on a conservative basis), reclaim a Brownfield site (the former Kempston Hardwick Brickworks) and deliver important new road infrastructure including a bridge crossing of the railway line between Stewartby and Kempston Hardwick Stations.

4.2 A 'Market Assessment Report' prepared by Savills accompanies this submission. Savills has a detailed understanding of UK market, a strong appreciation of this area, the needs of local employers and the opportunities being presented by the recommendations of the National Infrastructure Commissions (NIC) regarding the Oxford to Cambridge growth corridor.

4.3 Section 6 of the report assesses the demand for and availability of sites and buildings for the industrial and warehousing sector. We highlight the following elements:

Paragraph 6.6 - There is a very low vacancy rate of just 4.47% in the sector which can stifle take up and economic growth. Strong demand in the market is keeping vacancy low.

Paragraph 6.7 - Approximately 50% of the currently available units are less favoured, older grade B or C quality providing a poor choice for employers who wish to locate or expand within the Bedford area.

Paragraph 6.10 - New space taken up within this sector between January and September 2018 has been 3,972,357 sq ft. This represents a 72.77% increase from levels reached in the full year in 2017. It is 25% above the long term average of 3,031,634.5 sq ft. At this rate, less than one year's supply remains which fails to support the strong economic growth prospects of the region

Paragraph 6.14 - There are no freehold units or sites currently available for sale in Bedford.

Paragraph 6.17 - There is very little land now available in Bedford and much of what is advertised in Bedford Borough Council's Strategic Sites brochure has already been taken up.

Paragraph 6.18 - Bedford is in a weak position to attract inward investment with little industrial land available and no freehold building opportunities

4.4 Section 7 of the report considers the office market. Again, we highlight the following key findings:

Paragraph 7.4 - A falling supply and good demand from occupiers has led to a rise in prime rents across the region. The rental increase is an indicator of undersupply in the market.

Paragraph 7.15 - The Bedford office market is characterised by poor quality second-hand office stock. Much of the town centre stock has been depleted through residential conversions possible through the permitted development (prior approval) procedure.

Paragraph 7.16 - In 2011, availability in Bedford was 339,518 sq ft. Despite new space being delivered, as a result of good take up available space today is just 126,474 sq ft, a fall of 63%. The remaining stock is poorer quality. The absence of good quality office buildings often results in Bedford being overlooked by occupiers from outside the town. Occupier interest from the key commercial sectors including pure offices and R&D remains high for good quality space. A fundamental lack of good quality buildings in Bedford means that it is not currently considered by many firms.

Paragraph 7.17 - Despite the lack of quality buildings available take up was 43,702 sq ft in 2017 compared to 35,366 the previous year showing an increase of 23.6%.

Paragraph 7.19 - There is good demand from occupiers within the region whose key criteria, when choosing a location, is the ability to attract and retain talented staff. They are drawn to locations with good transport connections and Bedford is well placed mid-way between Oxford and Cambridge and north of London. It will benefit from the proposed East-West Rail and East-West Expressway and could offer a more economical alternative to the overheating and constrained markets in Oxford, Cambridge and London.

4.5 The report's clear conclusions are set out in Section 10. We reproduce below the key aspects:

> *"10.1 Considering the large size and scale of the site,* ***there is an opportunity to create high value sector clusters in a mixed use scheme blended to complement a diverse range of occupier requirements****.*
>
> *10.2* ***There is plainly the need for more employment land in Bedford.*** *Manufacturing occupiers often prefer freehold options which allow long term investment in bespoke facilities without the constraints of a lease. Many industrial sectors are increasing the size of their units to drive efficiencies and accommodate the automation and robotics that speed their processes and secure their business.* ***Very large sites to accommodate these modern facilities are rare nationally and in Bedford there are no freehold sites remaining which could welcome a large employer. The availability of deliverable land was a key factor in attracting B&M to Bedford despite their large geographical search area and such sites are powerful attractions for inward investors****.*
>
> *10.3 Parts of the site are suited to hybrid buildings which are detached facilities encompassing office, administration, manufacturing and warehouse functions in a single facility.* ***Uniquely, the site could offer such a business room to expand and grow in the longer term whether they might need more offices or more industrial facilities.*** *A mixed use site is ideal for attracting occupiers for whom a pure office does not suit their needs such as research and development businesses or laboratories which require high office content hybrid buildings. These units mix well with office units in a business park environment and also intermingle well with more industrial buildings. Proximity to Cranfield University, Oxford University and Cambridge University, three key national global centres of excellence soon to be connected to Bedford at their centre, are opportunities to be harnessed.*
>
> *10.4 In terms of B1, we have demonstrated current demand for approx. 540,000sq ft of office and hybrid space from a range of occupiers. Based on a development density of say 20,000 sq ft per acre for a detached office/hybrid building, this demand would require 27 acres to be satisfied. Whilst Bedford currently has 159.3 acres of land available for this use, most of the sites are compromised or are not available for various reasons mainly relating to flooding and viability issues as set out in para 7.18. The current stock of existing office buildings in Bedford is poor quality which does not meet the needs of modern occupiers.* ***Future demand for further office accommodation is expected to rise as a result of the proposed investment in the Oxford – Cambridge arc.***
>
> ***10.5 In terms of B2, we have demonstrated current demand for in excess of 270,000 sq ft for manufacturing use which requires approx. 15 acres.*** *Of the sites available in Bedford, only land West of Manton Lane has the correct allocation or permission to suit the use but it is sloping and therefore more expensive to develop. It is not likely to be attractive to an occupier.* ***There are no other sites which could accommodate such a user freehold.***

10.6 For B8 we have demonstrated ***current demand for in excess of 6m sq ft which requires 300 acres to be satisfied****.* ***There are no freehold sites available with a B8 allocation.*** *We have demonstrated that there is insufficient land and premises currently allocated or with permission to meet this demand.*

10.7 ***The Bedford Business Park proposals will meet the gap in the demand and supply and offer a viable and deliverable opportunity to provide significant benefits to the local economy as well as support the proposed future economic growth of the area****."*

4.6 In summary Savills calculate demand for B1, B2 and B8 uses to be for 342 acres of land (27+15+300) but note that this level of demand will rise, particularly office accommodation, as a result of the proposed investment in the Oxford to Cambridge growth corridor. At 550 acres this site would provide for current and expected future growth.

4.7 Since this report was produced, market interest in this location, particularly from the logistics sector remains strong. In terms of logistics, market demand, boosted by the structural transition from bricks and mortar to online retailing, remains robust in and around the M1/A1 corridor. The recent events of COVID19 have also underpinned the importance of a robust supply chain to support the economy, serviced by modern distribution warehousing. The Bedford Business Park is exceptionally well positioned to capitalise from these changes, being located almost equidistantly between the M1 and A1 with excellent road connections via the adjacent A421. Recently, B&M and Aldi have selected the area and secured planning consent to locate their new regional distribution facilities. These are now under construction and total c.1,000,000sq ft and c.900,000sq.ft in size respectively. The B&M facility alone is projected to provide over 300 new direct jobs. In addition, adjacent to the subject site, G-Park Wixams is now under construction. This is a speculative scheme providing approximately 480,000sqft of warehouse space across 3 units.

4.8 In early 2020, Savills produced a report titled 'The Oxford Cambridge Innovation Arc' which sought to identify the development opportunity brought about by the region. In this report, the importance of Bedford is highlighted due to its central location in the geography of the Arc.

4.9 Given the excellent transport links it possesses, including the East-West railway, the report identifies a significant growth opportunity in Bedford for both residential and commercial development. The report states that the Bedford area is likely to see an increase in investment in the coming years as new infrastructure comes online, creating a connected 'transport hub' allowing for future homes and jobs to be well networked within the region.

Oxford to Cambridge Growth Corridor

4.10 The allocation of the site would very directly respond to the NIC's locational growth strategy for this area over the next 30 years, (Partnering for Prosperity Report November 2017). When discussing the employment needs in the corridor the NIC report advises:

> *"…..the area could support around **335,000 new jobs to 2050**, increasing economic output by around £85bn per annum (2011 prices). However, by meeting future needs and removing the constraints to growth arising from the area's housing shortage the area could sustain a **transformational level of growth, supporting around 1.1m new jobs** and increasing economic output by £163bn per annum*." (Page 25)

4.11 When discussing locational requirements for the new employment growth that is considered vital to support the recommendations for one million new homes in the corridor to 2050 the report states that the east-west rail upgrade should deliver:

> *"……..major urban extensions – for example, between Oxford and Milton Keynes, and between Bedford and Cambridge…….. **unlocking growth in and around Bedford, and focusing development on a small number of key nodes in the Marston Vale.**"*

4.12 On page 36 the report comments that the key opportunities for growth over the next 30 years could include:

> *"**concentrated growth in the Marston Vale between Milton Keynes and Bedford**, focused around a few key rail nodes in the area, and providing the critical mass to expand local services;*
>
> *…**major development around Bedford**, supported through the introduction of East West Rail services and the wider connections that exist via the Midland Mainline;"*

4.13 As will be readily appreciated, the site is located adjacent to key transport nodes, (railway stations and the A421 expressway), within the Marston Vale, south of Bedford. In location terms therefore it is difficult to envisage a site more directly in accordance with and so supporting the vision of the NIC than this site.

Detailed Site Considerations

Open Space & Green Infrastructure Provision

4.14 The site Master Plan and Open Space parameter plan demonstrate the delivery of just under 30 hectares of new green infrastructure and amenity space, retain 10.77 hectares of existing planting within the site to be retained and 4.47 hectares of new landscaped corridors along access routes. There would also be 8.45 hectares of sustainable, drainage ponds, green swales etc. A small lake and associated drainage channels make up a further 4.85 hectares. The total open space and accessible green infrastructure is therefore 68.36 hectares or 30.81% of the overall site area

4.15 Across the site as a whole in order to further the aims of the Marston Vale Community Forest the site would deliver 30% tree canopy cover and provide important new linkages through what is a currently inaccessible area of land connecting the forest to the south of the Vale with Bedford to the north.

Landscape & Visual Impacts of Development in this Location

4.16 As part of the application submission (as discussed in Section 3) a full Landscape & Visual Impact Assessment (LVIA) was prepared. This is a highly detailed, technical assessment which should be read as a whole. In broad terms it concludes (as with any development of scale) that there would be some minor adverse residual impacts resulting from built development at the site. However, these may be considered to be outweighed by the delivery of new employment and would significantly lessen over time as new planting establishes.

Sustainability & Renewable Energy

4.17 An Energy & Sustainability Statement has been prepared for the site. This proposes a 'lean, clean, green' hierarchy, to first reduce the demand for energy, then to deliver energy efficiently and finally to utilise renewable energy technologies. The outcome of this hierarchy is to reduce demand for energy as a priority before resorting to low carbon technologies. The strategy would deliver:

- A minimum 10% reduction in carbon emissions below the normal requirement set by the Building Regulations
- The support of at least 10% of regulated energy consumed in the new development to be provided from decentralised and renewable or low-carbon energy sources.
- A BREEAM "very good" standard or equivalent.

4.18 In order to achieve the targets energy efficiency strategies are proposed in the design including:

- Improving the envelope thermal performance
- Utilising mechanical ventilation with heat recovery
- Natural ventilation through adequate provision of openable windows removes the need for comfort cooling.

4.19 The following options are recommended for the different employment uses proposed.

	Heating	Domestic Hot Water	Cooling	LZC technologies
B1 Offices	VRF Heat Pump	Point of use electric	VRF Heat Pump	Roof mounted PV Heat Pump
B2 General Industrial	Gas fired radiant heating Offices - VRF Heat Pump	Direct gas fired condensing calorifier	None Offices - VRF Heat Pump	Roof mounted PV
B8 Storage and Distribution	Gas fired radiant heating Offices - VRF Heat Pump	Point of use electric	None Offices - VRF Heat Pump	Roof mounted PV
A1 Retail	VRF Heat Pump	Point of use electric	VRF Heat Pump	Heat Pump

4.20 The final options selected will be based on the best overall performance from an energy, carbon, and whole life cost basis. The results from Building Regulations Part L calculations have demonstrated that the above energy efficiency design strategy has the potential to achieve an average 34% improvement over building regulations and just over a 14% LZC regulated energy generation and so were sufficient to meet the planning requirements. The BREEAM pre-assessment for the development shows the proposed route to achieving at least a BREEAM Very Good standard.

Contamination & Ground Conditions

4.21 Ground investigation work has been undertaken. This divides the site into three zones:

- Zone 1 - Areas of the site which have not previously been developed or significantly developed and so are likely to comprise natural ground at shallow depth.

- Zone 2 - Areas of the site which have previously been occupied by significant development/industry, e.g. kiln structures/chimneys, buildings and railway sidings and so may comprise a variable thickness of made ground. The ground beneath the former kilns is likely to have been affected by the transfer of heat from the kiln into the underlying ground.

- Zone 3 – The infilled clay pits, ground conditions are likely to comprise a significant thickness of quarry waste e.g. clay and bricks.

4.22 The report therefore recommends mitigation in the form of earthwork to achieve a consistent formation, especially in areas of clay pit infill and previously developed parts of the site. In the areas beneath the former kiln structures the report highlights the presence of 'baked clay' and 'burnt clay'. This suggests that the underlying soils have been impacted by the heating from the kilns causing the ground to settle due to desiccation. Appropriate remediation is required in this area. There are also obstructions within the ground arising from the previous industrial development of the site. These include a tunnel (connecting the site to a clay pit to the south), above/below ground storage tanks, and underground services. The detail of how these elements would be developed through further detailed assessment and invasive site works. The work undertaken to date however provides sufficient understanding of the site conditions to confirm that ground conditions are not impediments to site allocation.

Flood Risk & Drainage

4.23 A comprehensive Flood Risk Assessment (FRA) and drainage strategy has been prepared for the site. This demonstrates that parts of the site lie within Flood Zones 1, 2 & 3. The NPPF Technical Guidance states 'less vulnerable' uses of land are appropriate in zones 1, 2 or 3. Commercial development falls into the less vulnerable category.

4.24 In terms of surface water it is proposed to discharge to the Great River Ouse watercourse located adjacent to the western boundary. The Bedford Group of Internal Drainage Boards (IDB) has indicated that it will support a strategy based on restricted discharge rate 4 litres/second/hectare to the existing IDB drain network.

4.25 In terms of foul drainage, it is proposed to discharge to the existing 1500mm foul public sewer located circa 3.3km east of the development.

4.26 There are therefore no flooding or drainage constraints to the allocation of the site.

Ecology

4.27 Assessment work has been undertaken by Delta Simonds as part of the preparation of the current planning application and recommends retention of existing habitats as follows:

- At least 5 ha of woodlands that are situated within the south-eastern area of the site and those associated with Manor Road;
- The 960 m hedgerow that bisects the eastern extent of the southern arable land at the site is to be retained and it is anticipated it will be managed for its biodiversity value; and
- Lake 1 and the associated species-rich grassland will receive appropriate management following the development in order to maintain their ecological value as the remainder of Kempston Hardwick Pits CWS.

4.28 The development of the site would also include a range of habitat enhancement measures in order to strengthen existing features and to increase the ecological value and diversity of the site including a minimum of 20m wide woodland buffers throughout the site, providing connectivity within the site and to the surrounding landscape.

4.29 Attenuation ponds and swales will be designed to maximise the variety of habitats, with a number of ponds containing permanent water, others being seasonally wet, and the remaining ones designed to remain dry other than in times of flood. These will be appropriately planted for both their primary drainage function and to enhance biodiversity at the site. Dry attenuation areas, swales and seasonally wet attenuation areas will be planted with species rich grassland mixes and native seeds. Permanent ponds will be planted with native reeds and marginal wetland and aquatic species.

4.30 Overall, a net biodiversity gain would be delivered.

Highway Impacts & Green Travel

4.31 It is proposed that development at the site would deliver critical infrastructure improvements including new walking and cycling routes, new public transport and shared transport services, highway network improvements and a new vehicular bridge across the Marston Vale Railway Line. There is also potential for the Spine Road to form part of a route which in the long-term provides an alternative to the A421 and relieves pressure along this key movement corridor.

4.32 Active travel (walking and cycling) would be promoted through the introduction of 'active travel corridors' which run alongside the key routes within the site and connect the site with the existing walking and cycling network surrounding the site. A Workplace Travel Plan has been developed and includes a host of measures to reduce the number of single occupancy car trips generated by the site including; bike-sharing, improved public transport services, demand-responsive transport, car-pooling (liftshare) and a central mobility hub.

4.33 As noted above, the impact of the development on the local and strategic highway network has been assessed, and advanced discussions have taken place with Highways England to agree appropriate upgrade / mitigation measures at Junction 13 of the M1 and the A421 / A6 junction.

4.34 There is potential to provide active travel corridors between the proposed Bedford Business Park and Bedford, Stewartby and Wixams, and within the site and to Kempston Hardwick rail station. Specifically:

- Investigation of the potential for a bridge link across the A421 to improve walking and cycling connectivity between Bedford and areas to the south of the A421.
- secure, covered cycle parking facilities will be provided for each unit at Bedford Business Park in line with prescribed standards. The level of cycle parking demand will be closely monitored, and provision will be increased to meet demand as appropriate.

- Construction of new footpaths along desire lines between land uses to ensure that walking is considered as a realistic choice. The routes will be lit with appropriate security levels.
- Pedestrians will be given priority wherever possible over all other forms of traffic.
- Cycle lanes will be created alongside all major roads and cycle crossing facilities will be provided either as part of signalised junctions or signalised Toucan crossings
- Connections will be provided to neighbouring communities and surrounding employment/retail facilities for pedestrians and cyclists to reduce the dependency for car trips.
- A bike sharing scheme will be developed in tandem with the provision of new active travel corridors to promote and encourage cycling, either as the main mode of transport for travelling to and from work
- The bike sharing scheme will connect to public transport nodes and could be expanded to serve other developments adjacent to Bedford Business Park.
- 100 bikes will be provided at 10 docking station locations. The docking stations could be provided within Bedford Business Park, in Bedford and Stewartby, and at local rail stations (Kempston Hardwick or the new 'parkway' station).

4.35 In terms of enhanced public transport the site could deliver:

- A Shuttle bus service through the site and to the main rail stations.
- Demand Responsive Travel with the potential to provide services at the beginning and end of each shift, without the need to provide a service throughout the day at times when demand may be less.
- Provision of Real Time Passenger Information (RPTI) systems at the existing and proposed bus stops. RTPI provides the public with up to date and accurate information regarding bus and train services, reduces waiting times, increases the profile and encourages more people to choose public transport as their preferred mode of transport.

4.36 It is of course acknowledged that car travel will remain a significant part of the overall transport share at the site. It is proposed to provide a car club where several people access and drive the same vehicle. For example, several people in the same community would drive the car on different days of the week. This means that drivers have access to cars without the need to own them. Access without ownership is becoming more common in modern-day living.

4.37 The potential for carpooling at Bedford Business Park is significant, with employees having broadly similar working times with regular start and end times to each shift, and employees likely to be drawn from similar catchments. The design of Bedford Business Park will embrace carpooling, with carpooling priority spaces provided within the car park in prominent and convenient locations. Carpooling will also be promoted by the Community Concierge Team.

4.38 Bedford Business Park will be designed to accommodate Connected and Autonomous Vehicles, (CAVs). Convenient and attractive routes for CAVs have been designed into the masterplan. With CAVs operating within Bedford Business Park, and also providing the potential to connect Bedford Business Park to adjoining developments and potentially a new 'parkway' rail station, development at Bedford Business Park can transform transport in this area of Bedford. The proposal at Bedford Business Park is to introduce a three-vehicle operation to serve the site and connect to key local communities and transport hubs.

4.39 Overall these measures are expected to deliver a highly sustainable development and encourage a greater use of alternative modes of travel to the private car as required by both national and local planning policy. The use of the travel plan system however ensures that measures considered appropriate today will be kept under review and should proposals not deliver the results anticipated and / or new technologies and strategies emerge which could be utilised at the business park, these can be incorporated as part of regular reviews.

Agricultural Land Classification Assessment

4.40 A full agricultural land classification assessment has been undertaken. Much of the northern portion of the site has not been assessed as this is not agricultural land i.e. former brickworks and clay pits. The land south of Manor Road both east and west of the railway line has been assessed. The assessment concludes that 86.5% of the area falls within category 3B whilst 10% falls within 3A.

4.41 3A is categorised as 'Good' agricultural land whilst 3B is 'Moderate'. It is clear therefore that this proposal has no impact on any Grade 1 or Grade 2 land and so does not impact any land which is seen as the best and most versatile farm land.

Heritage & Archaeology

4.42 A full geophysical survey of the site has been undertaken followed by targeted trial trenching.

4.43 This has demonstrated that the overall archaeological potential of the site is low with the Council's archaeology officers being content that any further works could be secured by way of planning condition. Archaeology is therefore clearly not a constraint to development.

4.44 The site is located within the setting of a Scheduled Ancient Monument, the Kempston Hardwick Moated Site. This is assessed as an asset of high significance. Additionally, there are heritage assets located in the wider setting of the site i.e. up to 7km from its boundaries as agreed with the Council through the scoping exercise. These include Stewartby Conservation Area to the south east and the retained kiln walls within the former brickworks.

4.45 Through the consideration of the current application appropriate stand off distances to the SAM have been agreed with Historic England and so heritage considerations do not represent a constraint to development of the site.

5.0 OWNERSHIP & DELIVERABILITY

5.1 Cloud Wing UK Limited control the site and can ensure delivery as follows.

5.2 There are three parcels of land which make up the proposed allocation. These are:

1. The former Kempston Hardwick Brickworks north of Manor Road.
2. Agricultural land south of Manor Road, north of Broadmead Road and east of the Bletchley to Bedford Railway line.
3. Agricultural land west of the Bletchley to Bedford Railway line.

5.3 Cloud Wing has set up and own three SPV companies, one for each parcel which in turn hold options on the three areas.

5.4 Subject to allocation (or grant of consent) the SPV's will exercise these options and bring the site forward for development.

5.5 These details are confirmed in the accompanying letter from Cloud Wing's solicitors [redacted]

6.0 CONCLUSIONS

6.1 This submission seeks the allocation of land at Kempston Hardwick and off Broadmead and Manor Road to create a new high quality Bedford Business Park comprising a mix of B1, B2 and B8 uses supported by ancillary 'A' class uses and associated infrastructure open space and Landscaping.

6.2 It would be a highly sustainable development which would deliver approximately 15,000 new jobs, reclaim a Brownfield site (the former Kempston Hardwick Brickworks) and deliver important new road infrastructure including a bridge crossing of the railway line between Stewartby and Kempston Hardwick Stations.

6.3 As described in this statement, the proposed allocation is currently the subject of a well advanced planning application. It is Cloud Wing's intent that this is determined and taken forward at the earliest opportunity. This submission reiterates the readiness of the site.

6.4 As part of the promotion of the site Cloud Wing is liaising with SEMLEP and the DIT to explore the potential for an EV Gigafactory. This would deliver significant high quality employment opportunities for Bedford. Such a proposal requires size and scale and also access to local talent and complementary industries. Bedford is well placed in this regard with Cambridge and Oxford and also Milton Keynes readily accessible across the arc and also the local centres of excellence at Cranbrook University and Millbrook Proving Ground.

6.5 Justification for the proposed scale and location of the site is also provided in the 'Market Assessment Report' prepared by Savills who have a detailed understanding of UK market but also through its local office, a strong understanding of this area and the opportunities being presented by the recommendations of the National Infrastructure Commissions (NIC) regarding the Oxford to Cambridge growth corridor.

6.6 Although not government 'policy', the NIC's advice to government carries significant weight. Its November 2017 report, 'Partnering for Prosperity' highlights the corridor as a key location for new housing and employment growth over the coming 20 – 30 years. The planned east / west rail link which will connect Oxford and Cambridge at either end of the corridor, runs centrally through the site and the A421 expressway lies a short distance to the west. There are numerous very specific references in the report to significant growth in the Vale, south of Bedford and in particularly close to existing road and rail infrastructure.

6.7 This site represents an excellent, sustainable opportunity to enable Bedford to contribute towards the corridor objectives whilst delivering very significant economic, social and environmental benefits for the Borough and its residents.

6.8 The indicative master plan and parameter plans which are provided in support of this submission demonstrate how a high-quality environment could be created whilst respecting the neighbouring land uses, particularly the residential properties on Manor Road.

6.9 Careful landscape and visual impact assessments have assisted in the preparation of massing, density and height parameter plans which would guide future development.

6.10 The proposal would also further the aims of the Marston Vale Community Forest through the transformation of a site largely devoid of accessible green space with the delivery of over sixty hectares of open space and green infrastructure including new buffer planting, wildlife corridors and tree lined access routes with the overall aim of 30% tree canopy cover being achieved.

6.11 A sustainable drainage system would ensure that the sites surface water is appropriately controlled as part of a network of green features and prevent any adverse impacts upon the surrounding land.

6.12 The site represents a significant opportunity for growth to the south of Bedford.