

Our ref. P19-0021

11 August 2020

Bedford Borough Council
Planning Policy Team
Borough Hall
Cauldwell Street
Bedford
MK42 9AP

By email only: planningforthefuture@bedford.gov.uk

Dear Sir/Madam

Bedford Borough Local Plan - Call for Sites: Land south of Roxton Road, Great Barford

Pegasus Group act on behalf of Lone Star Land Limited ("**LSL**") with regard to their land interests at land south of Roxton Road, Great Barford (the "**Site**").

LSL has a promotion agreement with the owners of the Site. The Site was previously submitted to the 2015 and 2018 calls for sites associated with the Bedford Local Plan 2030 in combination with adjacent land north of Addingtons Road.

The purpose of this letter is to formally submit the Site comprising lands south of Roxton Road as shown on the Site Location Plan submitted with these representations for inclusion in the Bedford Borough Local Plan Review and to demonstrate that the Site is suitable, available and achievable for residential development.

This letter is accompanied by the following documents, which together with the letter form LSL's Call for Sites submission:

- Completed Call for Sites form
- Location Plan (reference 19235_PA_02)
- Access Design (reference 25003_08_020_01.1)

We have reviewed Bedford Borough Council's Local Plan Review Site Selection Methodology (July 2020) and broadly used it to inform this submission as follows.

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1. Contribution to Strategy

The Site is located near the settlement policy area boundary of Great Barford, with existing and consented residential development to its north, east and west.

The Development Plan for Bedford is the Bedford Borough Council Local Plan 2030 ("**BLP 2030**"), which was adopted in January 2020. **Policy 4S** of the BLP 2030 sets out the amount and distribution of housing to be provided in the Borough. According to the policy, 2,000 new dwellings will be allocated and distributed to key service centres including Great Barford in the plan period to 2030.

With direct regard to Great Barford, policy 4S identifies a necessity to identify sites for 500 homes, generally in and around the settlement policy area boundary. The policy sets out the Council's intent that the most appropriate means of meeting this requirement should be identified by representatives from local communities through their Neighbourhood Development Plans and rural exceptions schemes. However, if a Neighbourhood Development Plan or Neighbourhood Development Order (Regulation 16) has not been submitted to the Council by January 2021, the policy says the Council will allocate additional sites.

Being located immediately adjacent to the settlement policy area boundary of Great Barford, the allocation of the Site for the provision of a portion of the 500 required homes through the Neighbourhood Development Plan or, after January 2021, through the Local Plan Review would fully accord with the strategy set out in policy 4S of the BLP 2030.

2. Specific considerations

The Site Selection Methodology does not set out any particular market, locational or operational requirements for residential sites. However, we consider the following factors to be relevant to the suitability of the Site for residential development, in addition to those factors directly covered in the sustainability assessment or site constraint sections below.

The Site is a logical location for residential development. It has existing residential development immediately to its north-east, south-west and north-west and reserved matters approval has recently been granted for residential development immediately opposite the Site to the north. An outline planning application has been submitted relating to the land immediately east and south-east of the Site.

The proposed development would result in limited effects on landscape character and visual amenity, restricted to the Site and its immediate environs. The context to the Site

provided by the existing and emerging residential development on three sides of the Site, together with the visual containment provided by the combination of existing and consented built form, gently undulating topography and, in some views, 'layering' of intervening field boundary vegetation means that effects of residential development on landscape character and local visual amenity would be very limited in scale.

No designated heritage assets would be physically affected by the proposals and no harm would be caused to the significance of any heritage assets within the Site environs as a result of changes to setting. This includes Grade II Listed Brook House, and the Great Barford, Green End and Barford Hill Conservation Areas. The significance of these and all other heritage assets, the ability to appreciate their significance, the key contributing heritage interests to their significance, and all key views towards, from and including them, would be preserved.

As well as being well-located for pedestrian access to the facilities within Great Barford and bus access to larger surrounding settlements (as covered below), New Road and Roxton Road form part of Sustrans National Cycle Route 12.

3. Sustainability objectives

Table 1 below demonstrates how the Site performs against the sustainability objectives set out in Appendix 1 to the Site Selection Methodology.

Table 1: Assessment of Site against Sustainability Objectives

Assessment questions – is the site:	Assessment criteria	
Air quality - 1. Improve air quality		
1a. 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. The Site is adjoining the defined settlement policy area of Great Barford. Uncertain effect.
1b. Accessible on foot to a food store?	++	A site accessibility score of 8 is recorded where 8 is 0-10 minutes' walk. The Site is 0.3 miles (a 6-minute walk) from the general store at Great Barford Stores and Post Office (High Street) and Village Food Barford Supermarket (Bedford Road). Score 8.

Assessment questions – is the site:	Assessment criteria	
1c. Accessible on foot to a primary school?	+	A site accessibility score of 6 is recorded where 6 is 11 – 20 minutes' walk. The Site is 0.5 miles (a 12-minute walk) from Great Barford Primary Academy. Score 6.
1d. Accessible on foot or by bus to a major employer?	+	The Site is 0.3 miles (a 6-minute walk) from a bus stop providing services to employment opportunities in Bedford and Cambridge (X5 service offers up to half-hourly services at peak).
1e. Outside, adjoining or within the air quality management area?	+	The Site is not within or adjoining the air quality management area.
Biodiversity and green infrastructure = 2. Protect, maintain and enhance biodiversity and habitats.		
2a. Within or adjoining a site of nature conservation importance / within the impact risk zone of an SSSI / Natura 2000 site?	+	The Site is not within or adjoining a site of nature conservation importance (e.g. county wildlife site, local nature reserve), or within the impact zone of an SSSI / Natura 2000 site. The site sits within an IRZ in relation to Sandy Warren SSSI, however the IRZ does not apply to residential development.
2b. In an area where protected species are known or likely to exist?	+	No protected species recorded or likely on the site.
2c. Potentially able to achieve a net gain in biodiversity?	+	Development of the site will achieve a net gain in biodiversity when offsite mitigation is accounted for.
2d. Able to link in the green infrastructure opportunity network?	0	The Site is not within or adjoining the green infrastructure opportunity network.
Climate change and energy – 3. Reduce emissions of carbon dioxide and improve energy efficiency.		
3a. Proposing a renewable energy scheme or extra energy efficiency standards?	0	No renewable energy generation scheme is proposed 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?	?	Assessment as for 1a.
3c. Accessible on foot to a food store?	++	Assessment as for 1b.
3d. Accessible on foot to a primary school?	+	Assessment as for 1c.

Assessment questions – is the site:	Assessment criteria	
3e. Accessible on foot or by bus to a major employer?	+	Assessment as for 1d.
Cultural heritage and historic environment – 4. Conserve, sustain and enhance the historic environment.		
4a. Likely to impact on designated or non-designated heritage assets of their settings?	0	Proposal is unlikely to have a direct impact on any heritage assets.
Employment, business, retail and tourism – 5. Promote strong, sustained and balanced growth, stimulating job creation.		
5a. Likely to increase future economic and employment opportunities?	0	Proposal is not employment related.
Employment, business, retail and tourism – 6. Promote vital and viable town centres.		
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.
Health and wellbeing – 7. Encourage and support physical activity.		
7a. Within 400m of an existing open space or proposing open space within it?	+	Following the completion of development under reserved matters approval 18/02667/MAR (land north of Roxton Road), the Site will be within 400 m distance of a publicly accessible open space that includes an equipped children's play area of more than 200 sqm.
7b. Within 800 m of a sports facility or proposing a sports facility within it?	+	The Site is within 800 m of a publicly accessible sports facility (less than 600 m from Great Barford Playing Fields).
Landscape and townscape – 8. Protect and enhance landscape and townscape character and the sense of place in settlements.		
8a. Likely to have a significant adverse impact on the surrounding landscape?	0	The proposal is likely to have a neutral adverse effect on the landscape. A Landscape and Visual Impact Assessment has concluded that the Site is a very good site for residential development in landscape and visual terms. Residential development of the Site would have limited and localised landscape effects: a neutral/negligible adverse effect on the Great Ouse Clay Valley and Renhold Clay Valley Farmland Local Character Areas; and a minor adverse effect on the landscape character of the

Assessment questions – is the site:	Assessment criteria	
		Site and its immediate context. Measures including native species tree and hedgerow planting around and within the Site are proposed to mitigate the minor impact, ensuring a neutral overall impact.
8b. Within the existing settlement form?	+	The Site adjoins a defined settlement policy area or the built form of a small settlement. It is immediately adjacent to the defined settlement policy area for Great Barford.
Land, soil and water – 9. Maximise development on previously developed land and avoid the loss of high quality agricultural land.		
9a. On previously developed land?	x	The Site is not previously developed land as defined in the NPPF.
On best and most versatile agricultural land, i.e. grades 1, 2 or 3a?	?	The Classification of the site is not known or it is not clear whether it is classified as grade 3a or 3b.
Land, soil and water – 10. Protect the quantity and quality of water resources.		
10a. Within a groundwater source protection zone?	+	The Site is not located in a source protection zone.
Land, soil and water – 11. Minimise flood risk.		
11a. At risk of flooding?	+	The Site is within flood zone 1 (areas that have not been shown to be at less than 0.1% chance of flooding in any year).
Population, housing and community – 12. Promote good quality housing, ensuring an appropriate mix of house types and sizes.		
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?	?	Uncertain or insufficient information.
Population, housing and community – 13. Provide for residents' needs and improve access to community services and facilities.		
13a. Within 900 m of a facility where cultural or social activities can be accessed?	+	The Site is within 800 m of a facility where cultural or social activities can be accessed (less than 600 m from Great Barford Village Hall).
Population, housing and community – 14. Promote social cohesion, the prevention of crime and reduce the fear of crime.		

Assessment questions – is the site:	Assessment criteria	
14a. Likely to encourage social cohesion?	0	Neutral.
14b. Likely to help make the area safer?	?	Uncertain or insufficient information.
Transport – 15. Reduce the need to travel and promote sustainable modes of transport.		
15a. Within or adjoining the urban area, a defined settlement policy area or the built form of a small settlement?	?	Assessment as for 1a.
15b. Accessible on foot to a food store?	++	Assessment as for 1b.
15c. Accessible on foot to a primary school?	+	Assessment as for 1c.
15d. Accessible on foot or by bus to a major employer?	+	Assessment as for 1d.
15e. Able to connect with the highway without constraint?	+	No access constraints.
15f. Able to be developed without causing any highway or junction capacity issues?	+	No highway or junction capacity constraints.

4. Accessibility

As demonstrated in sections 1a-1d, 3b-3e and 15a-15f of Table 1 above, the Site is in a highly accessible location.

It is: within 0.3 miles (a 6-minute walk) of the nearest food stores (Great Barford Stores and Post Office on High Street and Village Food Barford Supermarket on Bedford Road); and 0.5 miles (a 12-minute walk) from the nearest primary school (Great Barford Primary Academy). It is also accessible by a frequent bus service to major employment opportunities in Bedford, Milton Keynes, Oxford and Cambridge. The bus stop for this service is within 0.3 miles of the Site.

As noted in section 2 above, as well as being well-located for pedestrian access to the facilities within Great Barford and bus access to larger surrounding settlements, New Road and Roxton Road form part of Sustrans National Cycle Route 12.

5. Constraints

The Site is not within a designated open space, view or local gap.

A July 2020 geo-environmental desk study relating to the Site has recommended a ground investigation prior to any redevelopment, to determine ground conditions, quantify any contamination and ground gas risk, enable development of a suitable remediation strategy as necessary and establish detailed engineering design requirements. An infilled historical gravel pit and water well are potential on-site sources of contamination and potential sources have been identified off-site including previous industrial activity, current agricultural land use, construction plant sale centres and residential properties.

The Site is not within a mineral safeguarding zone and there are no permitted landfills and waste sites within 1 km of the Site.

6. Summary

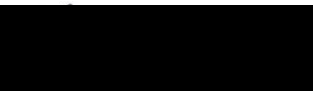
The Site is considered a logical location for residential development, being located immediately adjacent to the settlement policy area boundary of Great Barford, with existing and consented residential development on three sides and further residential development proposed to the south. Its allocation for residential development would fully accord with the strategy set out in policy 4S of the BLP 2030.

The Site is sustainably located within walking distance of the facilities of the key service centre of Great Barford, including food shops, a primary school and GP services. It is well-located for bus links to employment opportunities in larger nearby settlements and access to Sustrans Cycle Route 12. The Site is also within 600 m of sports facilities and will be in close proximity to a publicly accessible open space with an equipped children's play area following development of the site immediately north of Roxton Road in accordance with reserved matters approval 18/02667/MAR.

Unlike other residential development options in and around Great Barford, the Site can be developed without detrimental impacts on any heritage assets and with only a minor adverse effect on local landscape character (which itself will be mitigated).

Overall, the Site is suitable for residential development. It is immediately available for development that will contribute to meeting the requirement for 500 homes to be developed in and around Great Barford. Supporting information instructed by LSL in recent months demonstrates that there are no constraints that would prevent the Site from being delivered.

Yours faithfully


Director


Encs.