

## BEDFORD BOROUGH LOCAL PLAN REVIEW CALL FOR SITES CONSULTATION 2020

SUBMISSION ON BEHALF OF WYBOSTON LAKES LIMITED IN RELATION TO  
FUTURE BUSINESS & RESIDENTIAL DEVELOPMENT OPPORTUNITES AT THE  
WYBOSTON LAKES COMPLEX, GREAT NORTH ROAD, WYBOSTON,  
BEDS. MK44 3AL

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Prepared by: [REDACTED]

For and on behalf of Brown & Co.

Brown & Co is a leading provider of agency, professional and consultancy services across the whole range of rural, commercial, residential, and agricultural markets.

Date: August 2020.

Reference: Wyboston 014207

## 1.0 Introduction

- 1.1 Brown & Co have been instructed to submit the following Statement on behalf of Wyboston Lakes Limited in response to the Bedford Borough Council's 'Call for Sites' consultation and in support of the future allocation of land at the Wyboston Lakes Complex, Great North Road, Wyboston for wider business and residential development.
- 1.2 Over the past 30 years more than £45m has been invested at the Wyboston Lakes Business & Leisure Village to create a unique business, training and leisure complex (including the largest training centre in the country), which is now one of the major employers in Bedford Borough. The development of the site has had the support of the Borough Council, which has granted numerous planning permissions for a wide range of buildings and uses across the site. In 2012 Wyboston Lakes Limited acquired adjoining land from the East of England Development Agency with planning permission for around 18,500 sq metres of business development, which is now incorporated into the Wyboston Lakes Complex site.
- 1.3 Despite the Borough Council's support for investment and development over many years, the Wyboston Lakes development has historically been subject to the open countryside restraint policies and this has created an anomalous position. The Local Plan 2030 adopted in January 2020 has provided more certainty for further growth on the site through Policy 73, however, the policy refers specifically to development that '*supports and enhances its role as a regional centre for leisure, training and conferencing*'. The supporting text also refers to the opportunity for 'small scale' research and development "B1" use class employment, but this is at odds with previous permissions granted by the Council and the inclusion of the former East of England Development Agency land, which is now part of the site, as a strategic employment development opportunity as part of the Council's growth strategy.
- 1.4 Given the 'saved' and current planning permissions for more general 'B' class uses and residential development on the site, and the strategic site promoted by the Council, the Wyboston Lakes complex is being put forward for allocation for a wider range of employment and residential uses within the Local Plan Review.
- 1.5 With its prominence and connectivity to the road network the site has a significant attraction to businesses and investors, particularly in light of the east-west corridor connecting Cambridge, Milton Keynes and Oxford that is being promoted for growth by the Government. Additionally, the site's proximity to St Neots and its good access links offers the opportunity for a well related sustainable mixed-use development, that is accessible to a range of local facilities.
- 1.6 The purpose of this statement is to set out the background to the applicant's proposals and the key planning issues raised by them. The statement is structured as follows:  
**Section 2:** describes the physical characteristics of the **site context & background**;  
**Section 3:** outlines the **proposed development area**;  
**Section 4:** summarises the relevant national and local **planning policy context**;  
**Section 5:** provides a **planning assessment** of the key considerations raised by the proposal;  
**Section 6:** sets out in brief our overall **conclusions** on the proposal.

## 2.0 Site Context & Background

- 2.1 In location terms the site is adjacent to the Bedfordshire and Cambridgeshire County boundaries and the St Neots urban conurbation. St Neots is one of the largest towns in Cambridgeshire and is identified as a focus for growth in the adopted and emerging Huntingdonshire Local Plans, which identify its potential to provide an additional 4,000 houses over the next 16 years. The Wyboston Lakes development therefore offers the opportunity to provide growth that will improve local job opportunities and help stimulate sustainable economic growth in Bedford Borough and Huntingdonshire, as well as contribute to the Cambridge, Milton Keynes and Oxford growth corridor that is being promoted by the Government.
- 2.2 The Wyboston Lakes Business & Leisure Village extends to an area of 15.42 ha (382 acres) enjoying extensive riparian frontage to the River Great Ouse. Within the site there are three self-contained training centres and hotel services with 406 on-suite bedrooms, full catering/dining facilities and bars, conference suites, serviced office accommodation and a supporting wide range of facilities arranged informally throughout the site. These sit amidst a unique and extensive leisure and recreation centre that supports an 18 hole golf course, driving range, putting green and practise area with golf instruction, fitness centre, indoor swimming pool, spa, beauty treatments, restaurants, fishing and water sports centre with skiing lakes, jogging trail and nature walks. The village is a gated area with a security lodge and CCTV at the main entrance.
- 2.3 The training centres have a diverse client base drawn from local, regional, national and European locations. The Home Office established a regional office of the National Crime Agency (NCA) on the Village and Firebrand Training UK established their UK residential training centre on the Village in 2009 that welcomes more than 20,000 delegates a year onto their information technology and project management courses. Overall, the complex employs more than 650 people with support from a substantial number of local businesses.
- 2.4 Although the site is characterised by low density development with extensive and established planting providing attractive riverside parkland, this exhibits a clear built-up character with a diverse mix of developments, which will be consolidated by the already permitted schemes.
- 2.5 To the north west there is the Phoenix Business Park and further north there is the St Neots conurbation area with recent office, industrial and storage development on the Colmworth Business Park and a substantial warehousing building and retail development on Alpha Park. Beyond this there are the residential areas of the Eaton Socon and Eaton Ford, which are part of St Neots. The County boundary between Bedfordshire and Cambridgeshire follows the east-west A428.

### *Planning History*

- 2.6 The significant permissions on the Business & Leisure Village have included:  
RDC/TP/72/783 Recreation Centre – water-skiing, sailing, fishing, picnicking areas, caravanning, camping marina car parks, golf and other sporting  
B/TP/79/387 golf/marina clubhouse.  
B/TP/80/1562 Use of land for caravan site.

B/TP/80/2464 Installation of 100 permanent board moorings and 10 visitor moorings.  
B/TP/82/787 Clubhouse and boat parking area for sailing club.  
B/TP/84/1711 Motel  
TP/89/1448 residential business training and conference centre, golf driving range shop and amenities ('The Willows').  
TP/92/830 80-bedroom hotel with ancillary facilities.  
TP/93/231 complex administrative building.  
TP/94/706 additional classrooms to training centre, extension to golf range extension to golf range to provide fitness centre, gym and swimming pool. Extension to clubhouse to provide training and conference centre with 100-bedroom sleeping accommodation and replacement golf shop ('The Lakes').  
TP/97/341 36-bedroom block and car park  
TP/97/447 fitness centre  
TP/97/790 120-bedroom management training centre including site administrative building, car park and gardens (Robinson Centre).  
TP/97/1530 additional training suites ('The Willows').  
99/01211/REM site administration building, car park and gardens (Potton House)  
01/00338/FUL Innovation centre, parking and access and alterations to roundabout at A428.  
01/02676/FUL additional training, storage and workshop facilities and associated car parking. (Knowledge Centre)  
03/02547/FUL replacement golf professional shop and golf changing rooms.  
03/03100/FUL training suite/office building, additional bedroom accommodation and directors' accommodation with alterations to access road.  
04/03323/OUT hotel  
05/00817/FUL Training support offices  
05/01727/FUL building for Class D1 (Drama, Dance and Music training) use.  
05/02413/S73 Holiday Homes  
06/00722/OUT Independent Sector Diagnosis & Treatment Centre  
10/00007/MAF Permission for the development of a medical centre  
10/00759/EXTM Permission for 53 holiday lodges  
08/01890/MAO Permission for an Innovation and Technology business park development  
10/02007/MAO Permission for a Continuing Care Retirement Village (Class C2) comprising Care Home with nursing and dementia suites, restaurant, care apartments, spa and physio and associated works.  
18/01843/MAR reserved matters approved for the Continuing Care Retirement Village comprising 128 care apartments & a village care centre providing 61 care bedrooms, 49 care suites with restaurant, dining rooms, lounges, café, shop, hairdressing salon, activities rooms, gym, swimming pool & associated works.

### ***Outstanding Committed Development***

- 2.7 The committed development that has been initiated, but yet to be completed includes
- 2,417 sq. m of knowledge centre planning permission granted in 2002 – LPA Ref. 01/02676/FUL.
  - Three storey bedroom block granted in 2003 – LPA Ref. 03/03100/FUL
  - 1,672 sq. m of training support offices granted planning permission in 2005 – LPA Ref. 05/00817/FUL

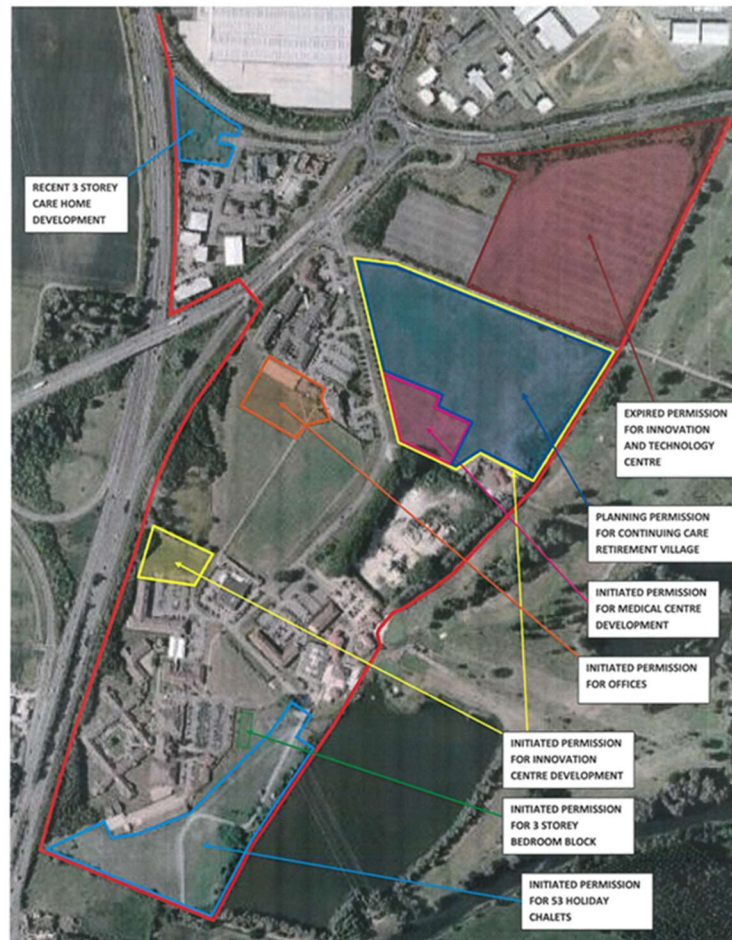
- Innovation Centre development with 11,305 sq.m of floor space - LPA. Ref. 01/00338/FUL.
- Medical Centre - LPA Ref. 10/00007/MAF
- 53 Holiday Lodges - LPA Ref. 13/00762/EXTM

2.8 There is in addition the following development with planning permission that has yet to be commenced:

- Continuing Care Retirement Village – LPA Ref. 10/2007/MAO. More recently the Council granted reserved matters approval on the 26th February 2019 for the development of a Continuing Care Retirement Village on the site comprising 128 care apartments and 49 care suites (providing independent and assisted living accommodation) & a village care centre with 61 care bedrooms, restaurant, dining rooms, lounges, café, shop, hairdressing salon, activities rooms, gym, swimming pool & associated works (LPA Ref. 18/01843/MAR).

2.9 Finally, it is highlighted permission has previously been granted by the Borough Council for an Innovation and Technology Centre with 18,500 sq. m of Class B1 floor space (LPA ref. 08/01890/MAO) on the land south of the A428 (former East of England Development Agency land) though this is now time expired.

2.10 The locations of the approved development are identified on the plan below.



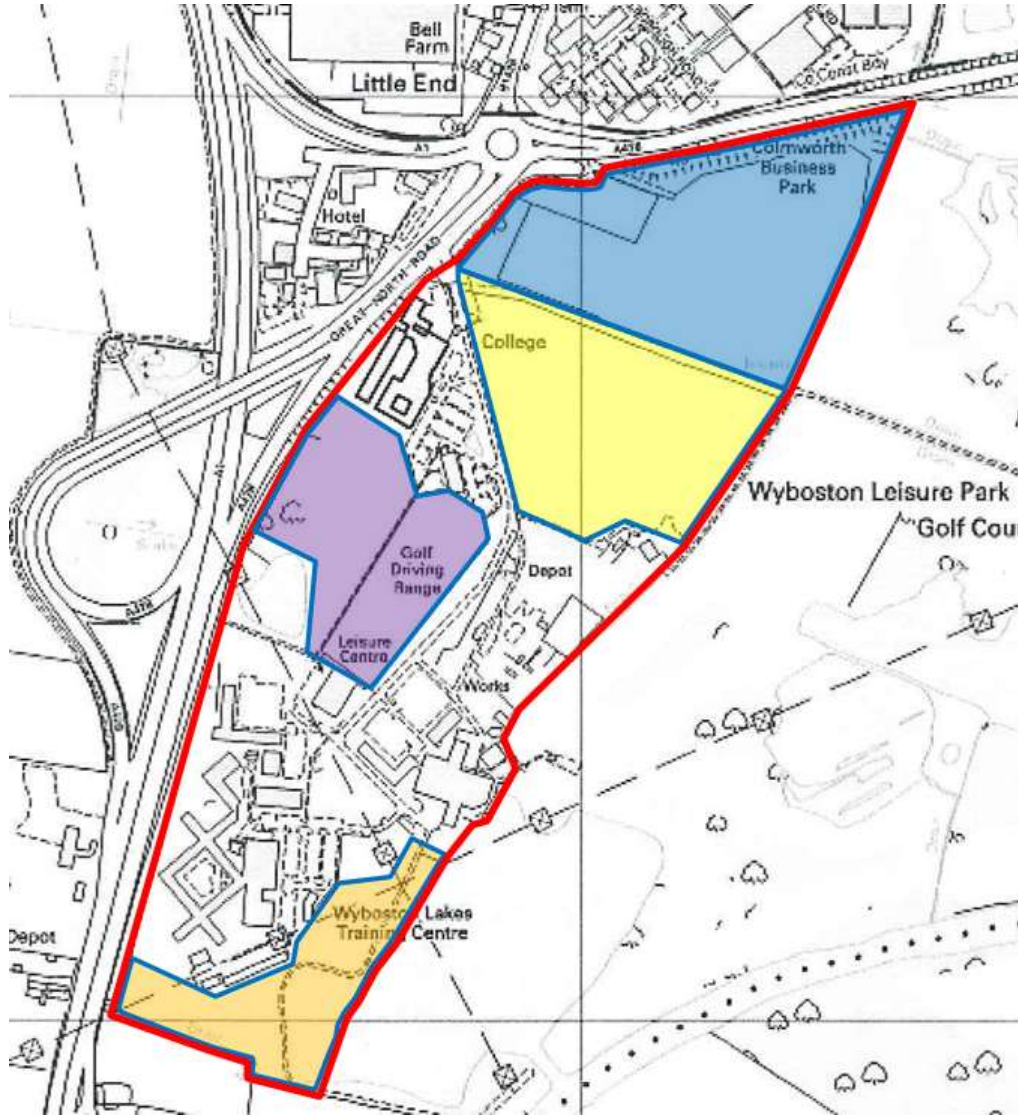
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**Overview**

- 2.11 The site has clearly been regarded appropriate for a wide range of imaginative development proposals and the current and permitted uses in the area comprise a wide mix of interrelated activities. By reference to the classifications in the Town & Country Planning (Use Classes) Order 1987 (as amended), these include: Retail shop (Class A1); Restaurant (Class A3); Innovation Centre and Offices (Class B1); Hotel (Class C1); Residential Training centres (Class C2); Residential dwellings (Class C3); Medical Centre (Class D1) and Dance Hall & Leisure (Class D2).

### 3.0 Proposed Development Area

3.1 The land being put forward for allocation within the complex extends to 21.2 ha. This comprises the four parcels shaded below.



3.2 The blue shaded area extending to 7.8 ha. has historically had planning permission for the development of a hotel and Innovation and Technology Centre with 18,500 m<sup>2</sup> of Class B1 floor space (LPA ref. 08/01890/MA0). This area is considered to have potential for either employment or residential uses, or a mixed use. In relation to residential development, it is highlighted the Council has already permitted the development of the Continuing Care Retirement Village including independent living accommodation, and holiday chalets. The Council must therefore be satisfied the site offers the opportunity for an appropriate living environment and with its proximity to a range of services and facilities within easy walking distance, and the proposed improved connectivity to St. Neots secured under Policy 73, residential development would be appropriate and sustainable. With its location the area is considered suitable for high density housing at circa 65 dph that could yield 500 dwellings. Alternatively, for employment development the area could potentially deliver business premises with a floor space of circa 23,000 m<sup>2</sup>, assuming 30% site coverage.



- 3.3 The area shaded yellow extending to 5.7 ha. has the benefit of a 'saved' planning permission for the development of an Innovation Centre with a floor area of 11,305 m<sup>2</sup> (LPA. Ref. 01/00338/FUL) and a medical centre (LPA Ref. 10/00007/MAF). More recently permission has been secured for the development of a Continuing Care Retirement Village on this area. Although it is hoped the site can come forward for this development, in the current economic conditions this is not certain and for this reason the Council is invited to consider alternative employment uses on the area. The area could potentially deliver business premises with a floor space of circa 17,000 m<sup>2</sup>, assuming 30% site coverage.
- 3.4 The area shaded purple extending to 4.4 ha. comprises the golf driving range and amenity land with currently limited use. With the development of computer golf ranges and swing analysers the driving range is considered to have a limited future, enabling the area to be bought forward for further employment development. The area could potentially deliver business premises with a floor space of circa 13,000 m<sup>2</sup>, assuming 30% site coverage.
- 3.5 The area shaded orange extending to 3.3 ha. has the benefit of a 'saved' planning permission for development of 53 holiday chalets (LPA Ref. 13/00762/EXTM). With the uncertain demand holiday chalet this area is considered to have potential for alternative employment uses. The area could potentially deliver business premises with a floor space of circa 10,000 m<sup>2</sup>, assuming 30% site coverage.

## 4.0 Planning Policy Context

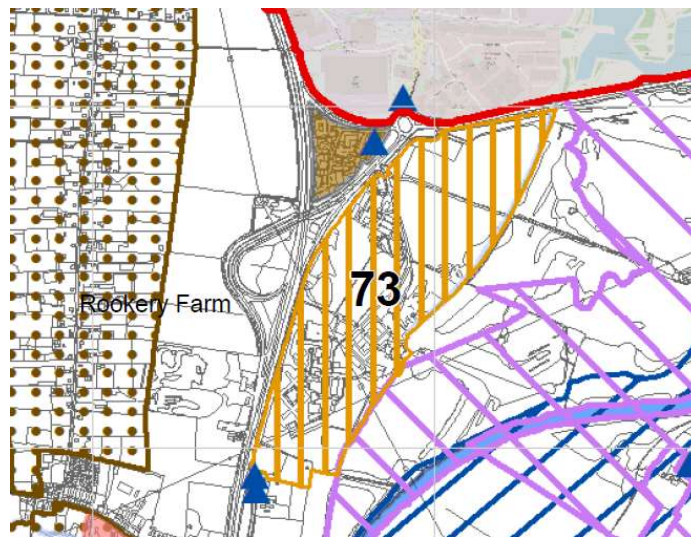
### *Bedford Borough Local Plan 2030*

- 4.1 As previously noted, the Wyboston Lakes complex site has historically had continued support for growth by the Borough Council, despite its countryside location in policy terms. However, Policy 73 of the Local Plan adopted in January 2020 has given the site a more formal policy status.

**Policy 73 - Wyboston Lakes**

Development at Wyboston Lakes which supports and enhances its role as a regional centre for leisure, training and conferencing will be supported where:

- i. In respect of B1 office proposals, it has been demonstrated that the development proposed cannot be accommodated within St. Neots town centre or any other town centres within the catchment area, and
- ii. Any retail use proposed is of a scale and nature that is ancillary to the primary uses on the site, and
- iii. New development includes high quality soft landscaping and planting throughout the site creating buffers and improved visual amenity, and
- iv. New development recognises and retains the existing low density character of this rural location, and
- v. It has been demonstrated that there is satisfactory access to the A428 or A1 highways, and
- vi. New development contributes toward the delivery of a satisfactory foot/cycle access to St Neots including a crossing of the A428, and
- vii. Where development protects, preserves or where opportunities arise enhances heritage assets and their setting, including listed buildings within the settlements of Wyboston and Little Barford, and
- viii. A Habitats Regulations Assessment and full bat survey show no significant effect on the qualifying feature of the nearby Eversden and Wimpole Woods SAC.



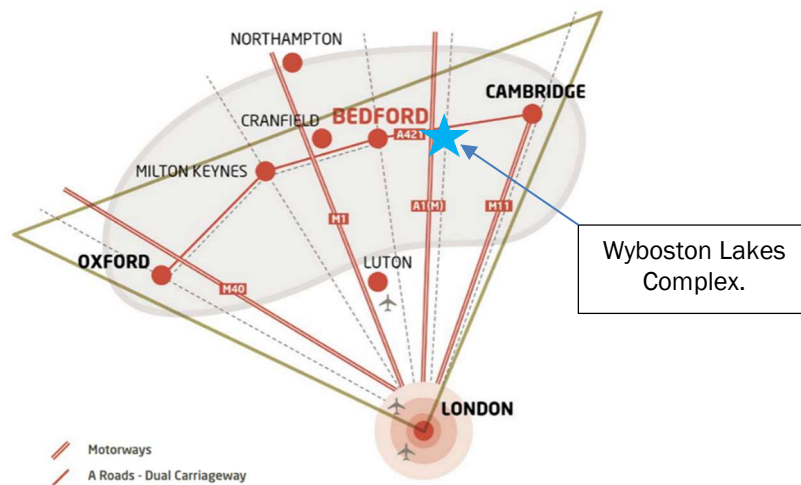
Proposals Map extract.

- 4.2 Paragraph 11.30 of the Plan clarifies *'In policy terms Wyboston Lakes is in the countryside but it is in close proximity to the A428 and A1 transport corridors as well as the urban area of St Neots. The site's location provides an important opportunity for both London, Peterborough north/south connections as well Cambridge, Milton Keynes east/west connections. The site is partly developed for various recreation, leisure and hotel, conference and training uses providing a wide range of predominantly non "B" use class employment within a low density landscaped setting'.*
- 4.3 Paragraph 11.31 further clarifies *'Whilst the Council recognises the role of the Wyboston Lakes Complex as a regional centre for leisure, training and conferencing based facilities, there is opportunity for the development of small scale research and development "B1" use*

**class employment.** In respect of B1 office uses it must be demonstrated that the proposed development cannot be accommodated within St Neots town centre, in accordance with national policy. Similarly, proposals for additional hotel conferencing, ancillary retail, as well as health and leisure uses could be supported within the wider site, provided that there is evidence that these are needed to support other uses on the site and are of a suitable design’.

**The Oxford-Cambridge Arc**

4.4 In 2016, the Government instructed the National Infrastructure Commission to produce a report on the Oxford-Cambridge Arc between Oxford, Milton Keynes and Cambridge to enable an understanding of its economic growth potential, and in March 2019 MHCLG published its ‘Government ambition and joint declaration between Government and local partners’. This sets out a strategic focus for growth along the arc based on four policy pillars with Policy Pillar 1: Productivity, clarifying the Government continues to recognise the Arc as a key economic priority.



4.5 It is evident the Wyboston Lakes Complex is well located within the Arc, at the juxtaposition where the A421/A428 meet the A1(m).

**Bedford Borough Local Plan Review**

4.6 The Issues and Options consultation acknowledges that whilst the recently adopted local plan did not allocate new sites for employment because there was already sufficient land available, that situation will change over review plan period. Also, the improved strategic links along the A421 corridor suggest that this might be a good location for much of the required growth to occur.

**Bedford Borough Growth Plan 2018 - 2022**

4.7 Clarifies the aim to create the right conditions to support and grow Bedford’s existing businesses and attract new investment to the borough, proactively marketing Bedford as a high value location within the Oxford to Cambridge Corridor.

- 4.8 The plan identifies Strategic Employment Sites including the former East of England Development Agency site, now within the Wyboston Lakes ownership for B1/R&D development with a floor area of 18,500 m<sup>2</sup>.



12.

**Wyboston Business Site**  
A1, St Neots

This prominent site of 5.8 ha adjacent to the Wyboston Lakes conference and leisure facilities and the Colmworth Business Park area has consent for R&D units.

The site is just off the A1 and A421, south of St Neots, giving excellent north-south and east-west connectivity with Bedford and Cambridge. Milton Keynes, Huntingdon, London and beyond are not far away by road, rail or air.

**Contact**  
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- Millions of square feet of business space
- 1 team to help you
- 2 hours to half of UK's population
- 35 mins to London
- 50,000 top students within 30 miles

**Key Data**

Area	5.8 ha/14.3 acres remaining
Floorspace	Indicative 18,500 m <sup>2</sup> /200,000 sq ft
Development Aims	B1/R&D
Existing Uses	Vacant land
Planning Status	Outline consent for B1/R&D uses
Terms	Freehold
Timing	Land immediately available
Transport	Direct onto A428 and A1
Indicative additional jobs	c.450



## 5.0 Planning Assessment

### Policy

- 5.1 At a national policy level, the Wyboston Lakes complex is located on the Oxford-Cambridge Arc, which the Government recognises as a key economic priority. Also, the Local Plan review Issues & Options consultation acknowledges the planned improved strategic links along the A421 corridor suggest this might be a good location for much of the required growth to occur. The development at the complex therefore offers an opportunity to contribute to the national growth strategy.
- 5.2 The currently adopted Local Plan Policy 73 refers specifically to supporting development that supports and enhances the Wyboston Lakes complex as a regional centre for leisure, training and conferencing, with an opportunity for ‘small scale’ research and development “B1” use class employment. However, the **policy limitations are at odds with the previous planning permissions granted by the Council** including large scale B1 development comprising 18,500 m<sup>2</sup> of Class B1 floor space (LPA ref. 08/01890/MAO) and 11,305 m<sup>2</sup> of Class B1 floor space (LPA. Ref. 01/00338/FUL). In relation to the former, **the policy is also at odds with the Council’s own Growth Plan 2018 – 2022**, which promotes part of the Wyboston Lakes complex as a Strategic Site for Business.



*The previously permitted larger scale B1 development on the complex*

- 5.3 It is acknowledged that with the preparation of the now adopted Local Plan the Council did not need to allocate new sites for employment because there was already sufficient land available and this will have constrained the Council’s ability to consider the scope for a wider range of development at Wyboston Lakes. However, that situation will change over the review plan period and this offers the scope for supporting a more flexible range of uses and larger scale development on the complex.

### Development Impact

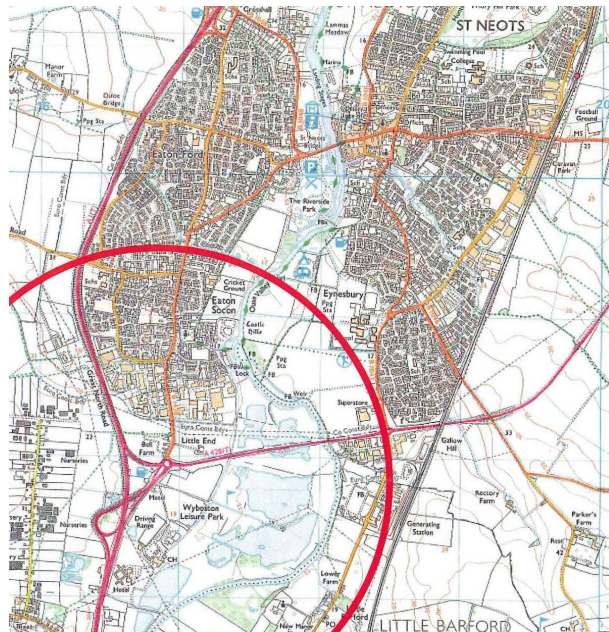
- 5.4 The site is previously developed land where significant planning permissions for a range of business uses have already been granted. With the grant of these permissions and the allocation under Policy 73, the Borough Council must be satisfied development can come

forward on the complex without harm to: the landscape or the setting of the wider area; transport issues; drainage or flood issues, or infrastructure difficulties.

- 5.5 In relation to the setting of the complex, the potential development identified allows for the edge of settlement location having regard to the established screening within and around the site, and the significant green amenity provided by the golf course along the western edge.

**Sustainable Location**

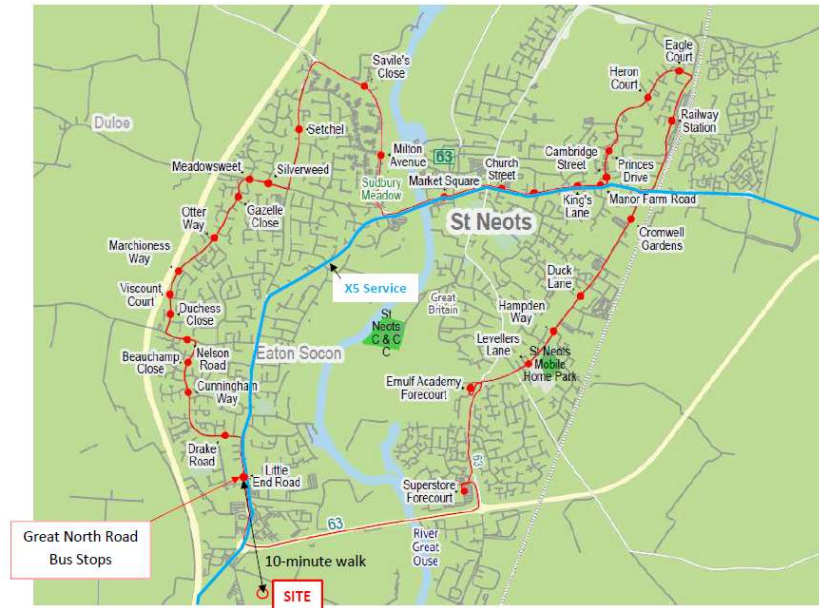
- 5.6 The site is positioned on the edge of the urban area of St. Neots, a market town with a population of more than 30,000 and the town is a focus for growth in the adopted Huntingdonshire Local Plan, which identifies its potential to provide an additional 4,000 houses over the next 17 years. The site also has good access to the strategic road network having the A1 and A428 Trunk Roads on the western and northern sides, and the East Coast Main Rail Line on the east side providing a 40 minute service to Kings Cross. The planned east-west new rail link is also expected to include a new train station south of St Neots, within close proximity of the complex.
- 5.7 With its proximity to the St Neots urban area the complex is clearly well related and in a highly accessible and sustainable location, within walking and cycle distance of residential areas and a range of facilities, and the complex is generally perceived as part of the town’s conurbation area.



*1.6 Km walking distance area for the site.*

- 5.8 In relation to public transport connectivity, the complex is within a 10-minute walk of bus stops on the Old Great North Road where the X5 bus service between Cambridge and Oxford and the local town bus service can be accessed.

**ST. NEOTS BUS SERVICE ROUTES**



5.9 The Wyboston Lakes complex therefore offers the opportunity to provide growth that will improve local job opportunities and help stimulate sustainable growth in both Bedford Borough and Huntingdonshire.

## 6.0 Conclusions

- 6.1 In conclusion the allocation of the areas identified for potential business and residential development offers the scope to secure sustainable well related economic and housing growth that can contribute to meeting the needs of Bedfordshire and Cambridgeshire, that will also contribute to meeting the national Oxford-Cambridge Arc growth strategy.