



1 INTRODUCTION

- 1.1 The following statement has been prepared on behalf of Newcrest Estates Limited and accompanies their submission to the Call for Sites in respect of land south of Goldington Road, Bedford. The completed forms are provided at **Appendix One**. The submission suggests that the land be allocated for employment purposes to meet the Council's needs. The site is able to accommodate a range of employment uses, including B1a 'Offices', B1c 'Light Industrial', B2 'General Industrial' and B8 'Storage and Distribution'.
- 1.2 It will be noted that the site is also the subject of a current application which seeks outline planning permission for the following:¹

" ... Demolition of existing workshop premises followed by development of land for employment purposes with up to 21,500sqm gross internal floorspace, comprising a mix of B1a 'Offices', B1c 'Light Industrial', B2 'General Industrial' and B8 'Storage and Distribution' uses, together with parking provision and landscaping, alterations to existing access, creation of landscaped area and associated works ... "
- 1.3 The development of this site offers an important opportunity to provide a new employment focus within Bedford. It will support the town's economic development, generating in the region of 600 new employment opportunities. While recent employment developments in Bedford have focused on largescale 'regional' distribution warehouses, it is intended that the proposal at Goldington Road would cater for a more localised market, with a mix of smaller units available on a freehold basis, offering an opportunity for local businesses to own their own premises.
- 1.4 The development at Goldington Road will provide an element of employment provision to the east of the Bedford. It capitalises on the accessibility of the site and balances the recent developments to the western side of Bedford. It will consolidate and enhance the existing commercial uses along this eastern approach to Bedford.

¹ Planning Application Reference 20/00076/MAO



- 1.5 The Submission Site is some 9.44 hectares in size, though not all of this land will be used for development purposes. The southern portion of the site would be used to provide landscape and biodiversity enhancements to the river valley, creating a high quality environment and delivering increased opportunities for public access. It will enable future links to create an extended riverside walk along the Ouse from Bedford town centre to the east, consistent with the Council's aspirations.
- 1.6 The current application was submitted at the beginning of this year but has not yet been determined. It is accompanied by a comprehensive suite of technical documents that address the site's constraints and opportunities. These include:
- Planning, Design and Access Statement;
 - Contamination Assessment;
 - Noise Assessment;
 - Ecological Appraisal;
 - Flood Risk Assessment and Drainage Strategy;
 - Landscape and Visual Impact Assessment;
 - Arboricultural Impact Assessment;
 - Heritage Assessment;
 - Energy and Sustainability Assessment;
 - Transport Assessment; and
 - Employment Market Report.
- 1.7 While we will not submit all of these reports for the purposes of this 'Call for Sites', reference should be made to these detailed appraisals where appropriate to inform the Council's review of the site's potential and its suitability.



SITE DESCRIPTION

The site occupies a highly sustainable location on the edge of the defined settlement boundary. It is largely contained by existing built development to the north and forms part of an established commercial area along Goldington Road. It represents a logical extension to the existing urban area.



2 SITE DESCRIPTION

The Submission Site

- 2.1 The submission relates to land south of Goldington Road, Bedford, MK41 0HY (the "Submission Site"). The Site extends to a total area of 9.44 hectares in size, though not all of this land will be used for development purposes. A site location plan is provided at **Appendix Two**.
- 2.2 The Submission Site lies on the eastern edge of Bedford, just less than three miles from the town centre. Although identified as 'open countryside' within the development plan falling within the Bedford River Valley Park and the Lower Great Ouse River Valley, it is immediately adjacent to the defined Urban Area Boundary and is largely contained by existing built development. The surrounding uses are described below.
- 2.3 Goldington Road (the A4280) forms the site's northern boundary, and the Submission Site gains access off the roundabout at the junction of Goldington Road and Norse Road. This access bisects the Submission Site, leaving two areas of open pasture either side. There is a narrow strip of land with a public footpath forming the site's eastern boundary, with Castle Dairy Farm beyond this. The Site's western extent is defined by the existing field boundaries.
- 2.4 A drainage ditch bisects the western fields. The northern portion is relatively flat while the land to the south slopes gently towards the River Great Ouse, which defines the southern extent of the Submission Site.
- 2.5 In terms of constraints and opportunities, there are two existing public foul water and rising mains that run across the site's frontage. These are subject to 3m easements that limit the ability to put built development above these. In addition, parts of the Submission Site fall within Flood Zone Two or Flood Zone Three. This constraint relates primarily to the southern field, which will not be used for development. There is also a small area along the eastern boundary, which will be used for car parking and landscaping.



Existing Uses

- 2.6 While the majority of the land is currently open, it includes a number of existing workshops in the southeast corner. These have a footprint of 930sqm and are currently occupied by Rogers of Bedford as vehicle repair workshops. The land immediately around them is used for the open storage of cars associated with the sale and repair of motor vehicles.
- 2.7 The principal administrative buildings used by Rogers of Bedford will be retained to ensure that the it can continue to operate. While some of the existing workshops would be demolished, there is scope for the business to secure new premises within the development. It is therefore intended that the existing business would be retained.
- 2.8 The Submission Site also includes a large area of open storage that had historically been occupied as a yard under Use Class B8 'Storage and Distribution'. This extends to some 0.75 hectares and has accommodated a range of different activities over the years, including haulage operations, storage of vehicles etc. More recently, planning permission was granted for the use of an existing cabin and area of land for a private hire business and associated minibuss storage. These elements represent a Sui Generis activity.
- 2.9 The remainder of the site is largely open and has been used for informal pasture and grazing. There is some existing landscaping on the site's boundaries, which are generally defined by hedgerows.

The Surrounding Area

- 2.10 Although the site lies on the edge of the defined urban area, it is largely contained by existing built development. This is dominated by existing commercial uses, which include a variety of activities including employment, leisure and retail operators.
- 2.11 The Elm Farm Industrial Estate lies to the north of Goldington Road. This is an extensive commercial area. It principally includes general industrial uses together with storage and distribution activities. However, it also includes various trade counters and retail occupiers such as Go Outdoors, Topps Tiles and Hatters, as well as a number of car showrooms, repair and car hire uses.
- 2.12 Established retail development lies to the west, including an existing Lidl, Waitrose and Tesco foodstores. There are restaurant uses such as Frankie and Benny's and The Orchard public house. Other retailers to the west include Wickes and Homebase, and there are two further car showrooms.
- 2.13 Castle Dairy Farm lies to the east of the Site. Although this historically included commercial uses, it is now residential. There are also a number of residential properties to the southeast of the Site, owned and occupied by the Rogers family. These include Castle Mill Cottage and Castle Mill House.



- 2.14 Risinghoe Castle lies amongst the buildings to the southeast of the Submission Site. This is the remains of a medieval castle. There are no designated heritage assets within the Application Site or in close proximity to it, though there are some further afield.

Accessibility

- 2.15 The Site lies just less than three miles from the town centre. Although identified as countryside, it occupies a highly accessible location on a strategic route into and out of Bedford. The A421 Bedford Bypass is just over one mile to the east, providing excellent connections to the strategic road network via the A1 and M1 Motorway.
- 2.16 The site benefits from good accessibility by bus and there are existing bus stops in close proximity to the site's entrance. This provides a frequent connection to Bedford town centre as well as the surrounding urban areas. There is an existing footpath on the northern side of Goldington Road, with an informal crossing point and footpath meeting the existing entrance to the Site. There is also a footpath along the eastern boundary of the site that connects to the surrounding footpath network.



DEVELOPMENT POTENTIAL

It is suggested that the Submission Site should be allocated for employment purposes. The Site is able to accommodate a range of different employment activities to meet the Borough's needs.



3 DEVELOPMENT POTENTIAL

- 3.1 It is suggested that the Submission Site be allocated for employment purposes. As noted above, it is currently the subject of an application for outline planning permission that demonstrates the site's development potential. The application proposes the following:²

" ... Demolition of existing workshop premises followed by development of land for employment purposes with up to 21,500sqm gross internal floorspace, comprising a mix of B1a 'Offices', B1c 'Light Industrial', B2 'General Industrial' and B8 'Storage and Distribution' uses, together with parking provision and landscaping, alterations to existing access, creation of landscaped area and associated works ... "

- 3.2 Copies of the submitted Master Plans are provided at **Appendix Three** for reference.
- 3.3 It is estimated that the scheme could generate in the region of 600 employment opportunities.³ The indicative layout shows the most likely arrangement of built form and demonstrates how the provision of up to 21,500sqm gross internal floorspace might be achieved. The site is split in to a series of difference zones, as summarised in the following table:

Zone	Floorspace*	Permitted Uses
Zone A	9,267 sqm	B8
Zone B	4,877 sqm	B2, B8
Zone C	4,274 sqm	B1c, B2, B8
Zone D	3,066 sqm	B1a
Total	21,484 sqm	

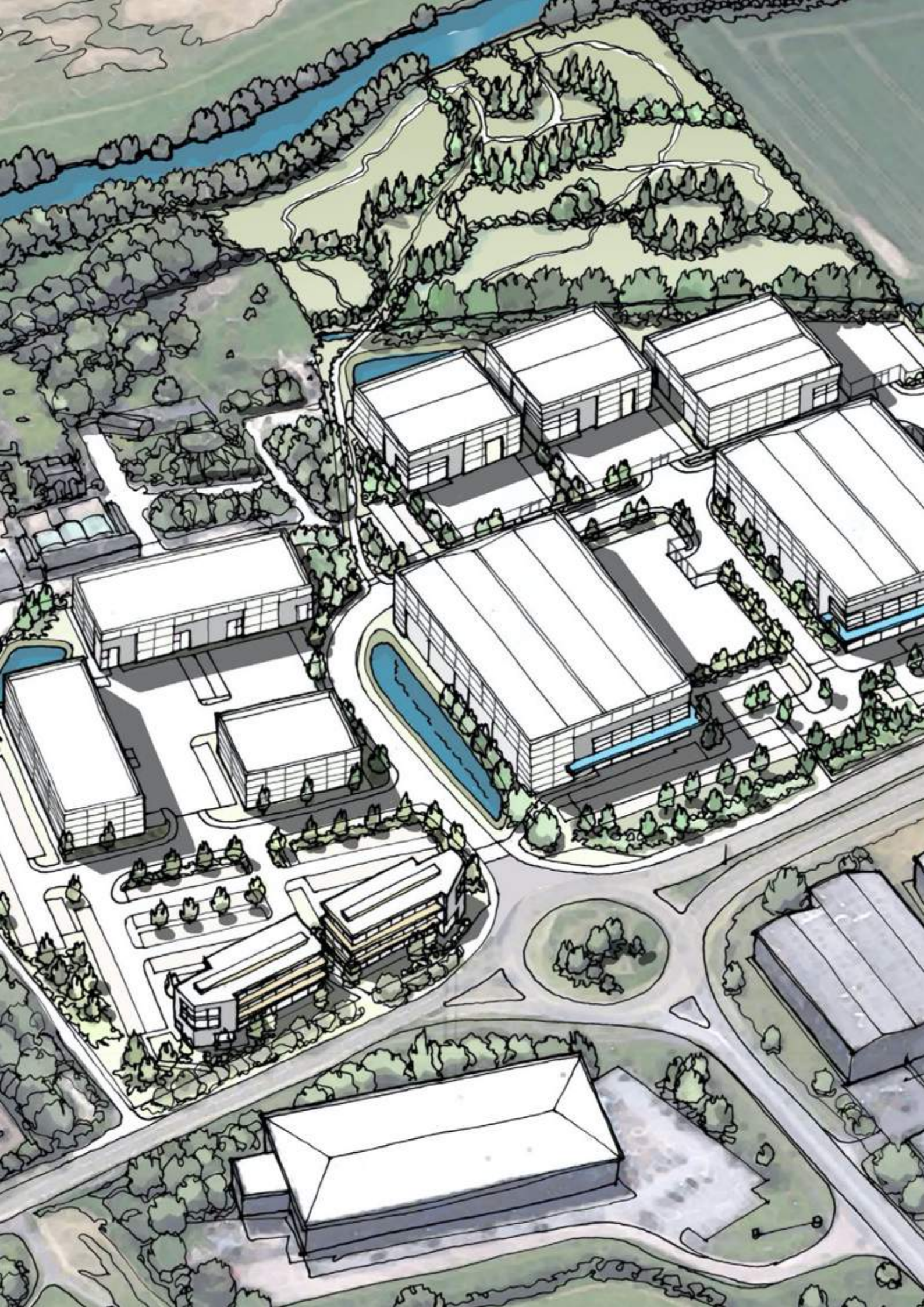
*gross internal

² Planning Application Reference 20/00076/MAO

³ Estimate based on HCA 'Employment Densities Guide' (Third Edition) 2015



- 3.4 Newcrest Estates Limited proposes a mix of units that would meet a variety of employment needs. The general mix has been informed by a market assessment by Brown and Lee and of particular importance, it is intended that they would be made available for owner occupiers to purchase on a freehold basis. This allows more opportunity for local firms to acquire and invest in their own premises.
- 3.5 The Submission Site is extended to include the field to the south of the development zones. This covers an area of approximately 2.05 hectares and having regard to the requirements of the Council's policies concerning the formation of a River Valley Park, would be used to provide an area of landscaping and biodiversity enhancements.





4 ASSESSMENT

Principle of Development and the Overall Suitability of the Site

- 4.1 We provide a review of the site's suitability with reference to the following considerations:
- The demand and need at the proposed location;
 - Potential for high quality development that would bring economic benefits;
 - Proximity to the strategic transport network by road or rail;
 - Concentration of strategic warehousing and logistics; and
 - Mitigation of any impacts.
- 4.2 These considerations draw reference from the Council's adopted development plan and specifically Policy 72S 'Additional Strategic Employment Development'.
- 4.3 **Demand and Need at the Proposed Location:** There is a demonstrable demand for the Proposed Development in this location and we would make reference to the findings of Brown and Lee in their Employment Market Report which is contained at **Appendix Four**.
- 4.4 At the outset, it is notable that Brown and Lee has been involved in the site for a considerable period of time. They have advised Newcrest on the scope of the site, based on their local knowledge of demand. Their report shows that they have received many enquiries over the last year that would match the profile of the current proposal.
- 4.5 In particular, Brown and Lee has received some 173 enquiries for industrial and distribution premises. A significant proportion of these fall at the smaller scale, consistent with the nature of space provided under the proposals.
- 4.6 The number of enquiries for office space has been lower, and this in part reflects structural changes in the office market and the strong competition with centres such as Milton Keynes. Nevertheless, there is demand for office premises within Bedford. It is notable in this regard that several large office buildings within the town centre have been converted to residential accommodation under Permitted Development Rights. This has generated demand for new, high quality office provision.
- 4.7 Brown and Lee is therefore confident that there is evidence of demand for the development of this site.



- 4.8 This conclusion is consistent with the findings of the Council's own evidence base, which has recognised a qualitative need for new sites. The Submission Site is well placed to meet this qualitative need and we would highlight the following key characteristics:
- Its location in proximity to the A421 and the 'golden triangle';
 - The site's relationship to the urban area and existing employment land;
 - The high quality form of development realised alongside the Bedford River Valley; and
 - The visibility and presence of the site as a 'gateway' to Bedford.
- 4.9 All of these factors were recognised when the Council's previously assessed the Application Site in its consideration and preparation of the Local Plan.⁴ The 'Economy and Employment Land Study' 2015, which refers to the location as 'almost unique', with quick and uncongested connections between London, The Midlands and East Anglia.
- 4.10 **Potential High Quality Development that would bring Economic Benefits:** The current proposal shows that the site is capable of delivering an excellent employment facility, with a particularly high quality environment. This is assisted by the proximity to the Bedford River Valley and the planned improvements, which will provide a unique employment location. The quality offer is such that it will allow Bedford to compete effectively with towns such as Milton Keynes.
- 4.11 The development would generate in the region of 600 employment opportunities. This is significant and would bring about considerable economic benefits for Bedford. As the proposed units are intended to be sold on a freehold basis, this offers an opportunity for local businesses to have greater control over their future.
- 4.12 **Proximity to the Strategic Transport Network by Road or Rail:** The Submission Site offers excellent accessibility. This is set out in detail within the Transport Assessment provided by Transport Planning Associates.
- 4.13 The site is in close proximity to the A421, providing links to both the M1 Motorway and the A1. The location here complies with the Council's requirements to focus in locations that are on this corridor, forming part of the 'golden triangle'. The site also benefits from accessibility by alternative forms of transport, including bus. Pedestrian and cycle access are also provided.

⁴ 'Economy and Employment Land Study' 2015 Table 40



- 4.14 The Council's consultants, GVA Grimley has already remarked upon the relative accessibility of the site to the strategic road network, and its relationship to existing, established employment areas.⁵ We would concur with their findings and agree that the site is well placed.
- 4.15 **Concentration of Strategic Warehousing and Logistics:** The Council's Policy 72S 'Additional Strategic Employment Development' asks whether development would result in an over concentration of strategic warehousing and logistics facilities in the market or in the proposed location. In this regard, the Submission Site does not propose distribution uses of a regional scale. As set out above, while it includes distribution uses, the scale of the units is aimed at a more localised sector. In any event, the larger strategic warehousing is found elsewhere within Bedford; such facilities are generally located to the west of Bedford, rather than to the east. Consequently, there can be no suggestion that the Proposed Development would result in any 'over concentration'. The site therefore satisfies this requirement.
- 4.16 **Mitigation of any Impacts:** The current application demonstrates that appropriate mitigation can be included for any impacts, as required. These include landscape, biodiversity and heritage impacts. These matters are discussed below and it is shown that there are no constraints to the development of the land.

⁵ 'Economy and Employment Land Study' 2015 Table 40



Layout

- 4.18 The layout plan accompanying the current application shows that an active and attractive frontage along Goldington Road. Accordingly, the office elements (including the ancillary offices as part of the larger distribution units) are positioned along the road frontage. This provides greater scope for glazing and a more interactive appearance. It also provides opportunities for greater variation in the architectural expression of these elevations. This is discussed below.
- 4.19 There is also scope for increased height in the buildings fronting Goldington Road, including the offices, whereas the smaller units at the rear of the development may be reduced in height. This provides a stepped arrangement and a softer appearance towards the more open land to the south.
- 4.20 The layout responds to the site's constraints. In particular, there is a large foul sewer along the site's frontage, to the west of the access point. Together with the associated easements, this limits the position of built development and pushes the larger units further back within the site. The associated parking provision is therefore placed in front of the buildings. This provides the further benefit of offering the scope to provide increased landscaping to soften the appearance of the buildings from the road frontage.
- 4.21 Similarly, the proposed layout ensures that built development is not positioned in areas of greater flood risk. As discussed above, the principal area of floodplain to the south, has been excluded from the Application Site for this reason. However, there is also a small area of land along the site's eastern boundary that is within the floodplain. This area has been used to accommodate car parking, and boundary landscaping. This arrangement also provides a buffer between the existing residential development at Castle Dairy Farm to the east of the site.





Access and Parking

- 4.22 The site is highly accessible by a variety of means of transport, reflecting its location on a strategic route. There are bus stops within easy walking distance of the site that provide good connections to the surrounding area. There is an established network of footpaths around the site and there are opportunities to enhance this provision to provide improved facilities for cyclists.
- 4.23 Improvements would be undertaken to the access road serving the site from the roundabout at the eastern end of the Application Site off Goldington Road. This would provide an internal spine through to serve the Proposed Development. The access would also continue to serve the retained 'Rogers of Bedford' business and residential properties beyond to the southeast. The internal road layout would facilitate the future development of the land immediately to the west, were this to come forward. While this is under separate ownership, the Proposed Development by Newcrest Estates Limited would allow for a comprehensive approach in the future.
- 4.24 The indicative masterplan shows that the Proposed Development would contain an appropriate level of parking provision. The industrial and distribution units would also have service yards as necessary.

Amenity

- 4.25 Sharps Gayler has prepared a noise assessment in support of the current application, which considers the effect of the proposed development on the nearest residential properties. On the basis of their surveys, Sharps Gayler concluded:⁶

"... the development will bring about low or no adverse noise impacts. This conclusion is drawn using a robust set of assumptions in relation to site activity levels, and including all noise sources ..."

- 4.26 Recognising that the scheme was in outline form only and that the individual occupiers had not been identified, Sharps Gayler went on to consider the likely effect of mechanical plant associated with the occupation and operation of the units and concluded that these could be dealt with by way of condition.
- 4.27 It is therefore concluded that even based on a 'worst case' assessment, the Proposed Development will not result in any unacceptable noise impact.

⁶ Sharps Gayler 'Noise Assessment' §4.11



Heritage and Archaeology

- 4.28 Orion Heritage has undertaken a 'Heritage Desk Based Assessment' to accompany the current application. The assessment confirms that there are no known, non-designated archaeological assets within the Application Site.
- 4.29 Although there are non-designated heritage assets, the Master Plan shows that there are no direct physical effects to these, only changes within their wider setting. In the case of Risinghoe Castle, a regionally significant non-designated heritage asset, this effect is considered to be 'low to moderate', and in the case of Castle Mill House and Castle Mill Cottage (locally significant heritage assets), this is considered a low effect. It is noted that there is an opportunity to improve the immediate setting of the castle mound.
- 4.30 The development of the land is considered to result in 'less than substantial harm' to heritage assets. Development therefore complies with Policy 41S 'Historic Environment and Heritage Assets'.

Flood Risk and Drainage

- 4.31 Stomor Consulting Engineers have prepared a Flood Risk Assessment and indicative Drainage Strategy in support of the current application. The assessment demonstrates that the development will primarily be located within Flood Zone 1, where there is a low probability of flooding. The proposed employment uses are also considered to be 'Less Vulnerable' and accordingly, there are no constraints to the development of this land.⁷
- 4.32 Their indicative surface water drainage design demonstrates that a Sustainable Drainage System can be used, together with attenuation to provide for sufficient storage to avoid flooding in any of the 1 in 100 year storm event (with +40% allowance for climate change).⁸
- 4.33 Taking account of the above, the development of the land is acceptable insofar as flood risk and drainage is concerned and this does not present any constraint to the development potential of the land.

⁷ Stomor Consulting Engineers 'Flood Risk Assessment and Drainage Strategy' §1.3.5

⁸ Stomor Consulting Engineers 'Flood Risk Assessment and Drainage Strategy' §6.2.6



Landscape

- 4.34 The Submission Site is not subject to any landscape designations such as Sites of Special Scientific Interest; Special Protection Areas; or Special Areas of Conservation. Similarly, there are no such designations within close proximity. It is however within both the 'Lower Great Ouse River Valley Green Infrastructures Opportunity Zone' and the 'Bedford River Valley Park'.
- 4.35 The landscape impact of development would be minimal, and we would note the following key points:⁹
- The site is within a settlement fringe landscape, being closely related to the existing settlement edge and the Elms Farm Industrial Estate;
 - The established vegetation provides a robust landscape edge to the site, creating a strong degree of separation between the site and the wider landscape setting beyond the River;
 - The landscape quality of the site is influenced by its proximity to the urban edge, and there are no significant internal features of note within the site; and
 - The farmed nature of much of the site had reduced its ecological contribution, though existing trees and hedgerow provide some ecological benefit.
- 4.36 The landscape scheme that accompanies the current application includes proposals to improve the land in the southern part of the Application Site. In this regard, the Proposed Development has the potential to make a positive contribution towards the River Valley Park, in accordance with Policy AD26 'Bedford River Valley Park' of the adopted 'Allocations and Designations Plan'. It will improve both the landscape and biodiversity of the land and provide opportunities for access and recreation.

⁹ Aspect Landscape Planning 'Landscape Visual Impact Assessment' §3.18 onward



Ecology

- 4.37 The site itself is not subject to any statutory or non-statutory ecological designations and the majority of the land is of limited ecological value, being dominated by agricultural land and grazed grassland fields. It is therefore relatively unconstrained. A number of hedgerows and trees are present at the field boundaries, which are of some elevated ecological value. However, these features could be retained and enhanced within the development. Similarly, the watercourses and drainage ditches on the site's boundaries are considered to be of some ecological value their retention and enhancement can be accommodated.
- 4.38 The proposals present the opportunity to secure a number of biodiversity benefits, including additional native tree planting, new roosting opportunities for bats, and more diverse nesting habitats for birds. In particular, a significant area of land will be utilised to create large swathes of wildflower grassland, presenting notable gains for biodiversity. This is consistent with the objectives of the Bedford River Valley Park and the requirements of Policy 42S 'Protecting Biodiversity and Geodiversity' and Policy 43 'Enhancing Biodiversity'.



5 SUMMARY AND CONCLUSION

- 5.1 This submission has been prepared on behalf of Newcrest Estates Limited in respect of land south of Goldington Road, Bedford. It is considered that the land should be allocated for employment purposes to meet the Council's needs.
- 5.2 The site is able to accommodate a range of employment uses, including B1a 'Offices', B1c 'Light Industrial', B2 'General Industrial' and B8 'Storage and Distribution'. The site is available immediately and is the subject of a current application which seeks outline planning permission for the with up to 21,500sqm gross internal floorspace.¹⁰ Development on the land could therefore be delivered within the next two to three years.
- 5.3 The proposed allocation is appropriate and consistent with the Council's objectives. We would highlight the following considerations:
- The site lies on the edge of the established urban area;
 - The surrounding area contains a mix of commercial and employment uses;
 - The location of the site is well related to the existing infrastructure;
 - The land is accessible by a variety of means of transport;
 - There are no overriding constraints to the development of the site; and
 - The proposal offers significant potential for environmental and ecological enhancement.
- 5.4 It is therefore considered that the site should be allocated for development.

¹⁰ Planning Application Reference 20/00076/MAO





APPENDICES

5. COMPLETED 'CALL FOR SITES' FORMS
6. SITE LOCATION PLAN
7. PROPOSED MASTER PLANS
8. BROWN AND LEE 'EMPLOYMENT MARKET REPORT'



Appendix One

Completed 'Call for Sites' Form



Local Plan Review

Have Your Say on the Future of Your Borough

BEDFORD BOROUGH LOCAL PLAN CALL FOR SITES SUBMISSION FORM

Please use this form to make a submission to the call for sites process and promote a site for development or redevelopment in the new Bedford Borough Local Plan. **Be aware that all sites submitted during previous call for sites exercises must be resubmitted again to be considered as part of this Local Plan.**

Wherever possible, sites should be submitted electronically through the council's online consultation system. The online system allows all details to be entered and allows for location plans to be drawn using the map function. Please complete a **separate form for each site**. If you are unable to use the online system, forms can be returned by email to planningforthefuture@bedford.gov.uk (please return as a WORD document) or by post to:

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

Your suggested site cannot be considered if you do not send along with the completed submission form a location plan which clearly identifies the site boundary and point of access to a public highway. The council is unable to provide blank plans for this exercise, but Ordnance Survey plans of sites may be obtained via external companies that can be identified through an internet search (there may be a charge for this service).

Please do not make submissions in more than one format or send to more than one email address. If you have sent information on a site electronically you do not need to print and post it.

Putting a site forward does not guarantee that the council will allocate it or support its development in the future, as all sites will need to be assessed in terms of site suitability, availability and deliverability against relevant planning policy and other considerations including site constraints. Further information can be found in the [Housing and Employment Land Availability Assessment Methodology](#) and the [Site Assessment Methodology](#).

This form and any information it contains will be published on the council's website in due course. Contact information will also be kept on the Planning Policy database for the purposes of communication regarding your site submission and the preparation of the Local Plan. Personal data will be collected and processed in accordance with the Data Protection Act and the General Data Protection Regulations. Further information can be found on the council's Data Protection webpage and in the Privacy Notices for planning policy.

CONTACT DETAILS		
	Personal details	Agent's details (if applicable)
Title	Mr	Mr
Name	[REDACTED]	[REDACTED]
Job title (if applicable)		[REDACTED]
Organisation (if applicable)	[REDACTED]	Town Planning Services
Address	c/o Agent	The Exchange Colworth Park Sharnbrook Bedfordshire
Postcode		MK44 1LZ
Telephone no	c/o Agent	01234 924922
Email	c/o Agent	[REDACTED]s
If you are using an agent, who would you prefer any correspondence to go to?	Contact agent <input checked="" type="checkbox"/>	Contact client <input type="checkbox"/>
Your interest (please indicate)	Land owner <input type="checkbox"/>	Contact both <input type="checkbox"/>
Current owner's name and address	[REDACTED]	Other (please specify) <input checked="" type="checkbox"/> Newcrest has an option agreement with the landowners.

1. SITE DETAILS				
a)	Address of site <i>Please attach location plan on an Ordnance Survey base clearly showing site boundaries and access to an adopted highway.</i>	Land south of Goldington Road, Bedford, MK41 0HY	d)	Adjoining land uses, if known. North: Employment South: Open countryside East: Residential West: Retail, commercial and open space.
b)	Gross site area (hectares)	9.44 hectares	e)	Has the site been developed previously? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
c)	Current use of the land	Vehicle repair workshops of approximately 930sqm, storage of motor vehicles, storage and distribution on c.0.75 hectares.		
2 PROPOSED USE				
2.1 What do you think the site should be used for?				
a)	What is the primary use you propose for the site? <i>Please tick one only</i>	Housing <input type="checkbox"/> Gypsy and Traveller Site <input type="checkbox"/> Employment <input checked="" type="checkbox"/> Retail <input type="checkbox"/> Hotel <input type="checkbox"/> All other types <input type="checkbox"/>	For mixed use proposals, what further uses do you propose for the site? <i>Please tick as many as apply</i>	Housing <input type="checkbox"/> Gypsy and Traveller Site <input type="checkbox"/> Employment <input type="checkbox"/> Retail <input type="checkbox"/> Hotel <input type="checkbox"/> All other types <input type="checkbox"/>
2.2 What type and scale/quantum of development do you propose on this site? Please complete all relevant sections below.				
a)	For housing (C2/C3 use classes) sites please indicate...			

i)	The number of dwellings the site could provide.		iii)	The density you have assumed	
ii)	The type of housing you are proposing	Family houses <input type="checkbox"/> Self-build/Custom build homes <input type="checkbox"/> Older people housing <input type="checkbox"/> Flats <input type="checkbox"/> Other <input type="checkbox"/> <i>Please specify</i>	iv)	The tenures you are proposing	<u>Market housing</u> <input type="checkbox"/> Owner occupied <input type="checkbox"/> Private rented housing <input type="checkbox"/> <u>Affordable Housing</u> <input type="checkbox"/> Affordable rent <input type="checkbox"/> Shared ownership <input type="checkbox"/> Other <input type="checkbox"/> <i>Please specify</i>
b) For Gypsy and Traveller sites and Travelling Showpeople sites please indicate...					
i)	If you are proposing the site as a permanent site or transit site.		ii)	If the site is privately owned.	Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know <input type="checkbox"/>
iii)	For a Gypsy and Traveller site the number of pitches and for Travelling Showpeople the number of plots the site could accommodate.				
c) For employment (B1/B2/B8 use classes) sites please indicate...					
i)	The type of employment the site could provide.	B1, B2 and B8	ii)	The gross floor space the site could provide.	21,500
d) For retail sites (A1 only) please indicate ...					
i)	The type of retail you are proposing.		ii)	The net floor space that the site could provide.	

iii)	The gross floor space that the site could provide.				
e)	For hotel (C1 use class) sites please indicate ...				
i)	The number of hotel rooms the site could accommodate.				
f)	For all other types, including leisure and recreation (D2 use class), community uses (D1 use class) and other uses please				
i)	Quantify the amount of development you propose		ii)	Fully describe the use here	
3 ACCESS					
3.1	Can suitable access be achieved for the site?	Suitable access is achievable <input type="checkbox"/> The current access is unsuitable/requires improvement <input checked="" type="checkbox"/> There is no access to an adopted highway <input type="checkbox"/>	3.2	Where will the site's access point(s) be? <i>Please give details here and show access on the site location plan.</i>	The site would gain vehicular access off the exiting roundabout with Goldington Road and Norse Road. This is shown on the Master Plans accompanying the submission.

4 AVAILABILITY AND ACHIEVABILITY CONSIDERATIONS							
4.1	Is the site available for development now?	Yes No Don't know	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	4.2	Is the site currently subject to a planning application?	Yes No Don't know	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
4.3	Is the site currently being marketed?	Yes No Don't know	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	4.4	Please provide details of any evidence of market interest in the type of development you are proposing on this site	Please refer to accompanying report by Brown and Lee.	
4.5	Are you the landowner of the site?	Yes No	<input type="checkbox"/> <input checked="" type="checkbox"/>	4.6	If you are not the landowner of the site you are submitting, do you have permission to submit the site for the council's consideration on their behalf?	Yes No	<input checked="" type="checkbox"/> <input type="checkbox"/>
4.7	Are you aware of any issues that might affect the viability of developing the site?	Yes No	<input type="checkbox"/> <input checked="" type="checkbox"/>				

5 DELIVERABILITY AND DEVELOPABILITY CONSIDERATIONS

<p>5.1 If the plan is adopted in December 2023 as currently proposed, when would you expect development to take place on site? <i>(please write in)</i></p>	<p>Years</p> <p>1-5 years (2024/25-2028/29)</p> <p>6-10 years (2029/30-2033/34)</p> <p>11-15 years (2034/35-2039/40)</p> <p>16+ years (2040 onwards)</p>	<p>5.2</p>	<p>What year, post adoption, would you expect development to start on site?</p> <p>2023</p>
--	--	-------------------	---

6 CLIMATE CHANGE

6.1

The council has declared a climate emergency. Please explain how your proposal will respond to climate change (see [Local Plan 2030 Policy 51S](#))

A flood risk assessment has been prepared for the site which shows that a Sustainable Urban Drainage System can be used and that there is sufficient attenuation available, including +40% allowance for climate change.

There is also potential to include significant environmental and landscape enhancements to the south of the site.

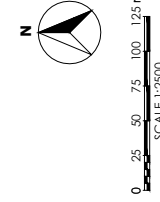
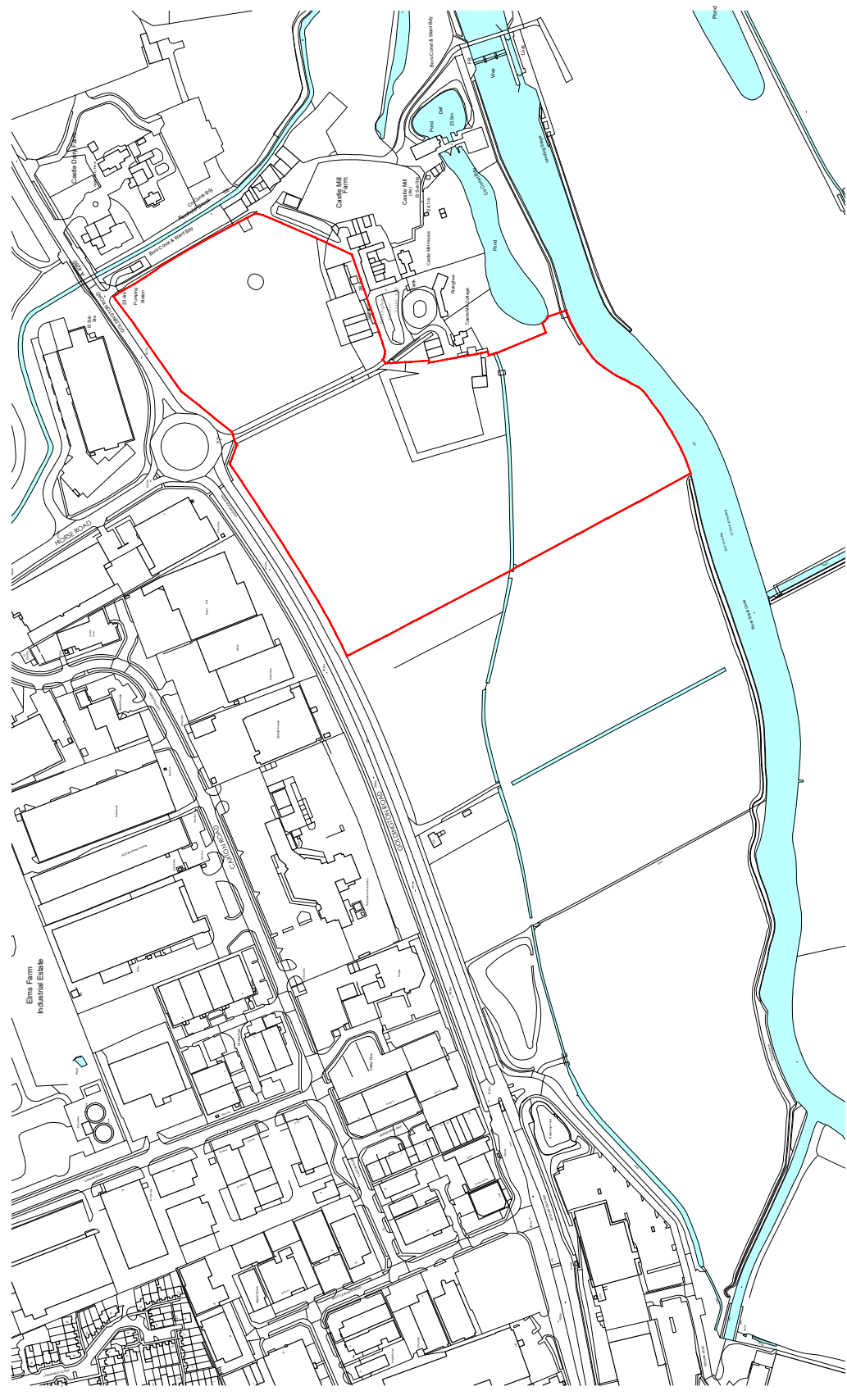


Appendix Two

Site Location Plan

THE INFORMATION CONTAINED HEREIN IS THE PROPERTY OF HARRIS & ARGENTIERI ARCHITECTS AND IS TO BE USED ONLY FOR THE PROJECT AND SITE SPECIFICALLY IDENTIFIED HEREIN. IT IS NOT TO BE REPRODUCED, COPIED, OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM, WITHOUT THE WRITTEN PERMISSION OF HARRIS & ARGENTIERI ARCHITECTS.

SITE APPLICATION BOUNDARY
23.33 Acres / 9.44 Hectares



C	1:2500	Revision Updated	DAC	DAC
B	1:1000	Site plan updated	CA	DAC
A	1:500	Site plan updated	DAC	DAC
Rev	Date	Description	By	Check By

Project Title: **PROPOSED EMPLOYMENT USE DEVELOPMENT**
GOLDINGTON ROAD
WOLFRIDGE
WV14 0HT

Client: **NEWCREST**

Status: **PLANNING**

Scale: **1:2500** Drawing Size: **A2**

Date: **28-03-19** Drawn By: **OJC** Checked: **OJC**

Drawing Title: **LOCATION PLAN**

Job-Dwg No: **15351-100**

251, John's North, Sook
 1, 01924 29 180
 251, John's North, Sook
 1, 01924 29 180
 The Old Rectory, 79 High Street,
 1, 0147 288555
 10 London Road,
 1, 0116 877700
 10 Gosport St, Chillingham Place,
 1, 0207 49113



Ordinance Survey, © Crown Copyright 2019. All rights reserved. Licence number 100022432

SITE LOCATION PLAN

CAD Reference: J:\15351\17.0 DRAWINGS\100 SERIES



Appendix Three

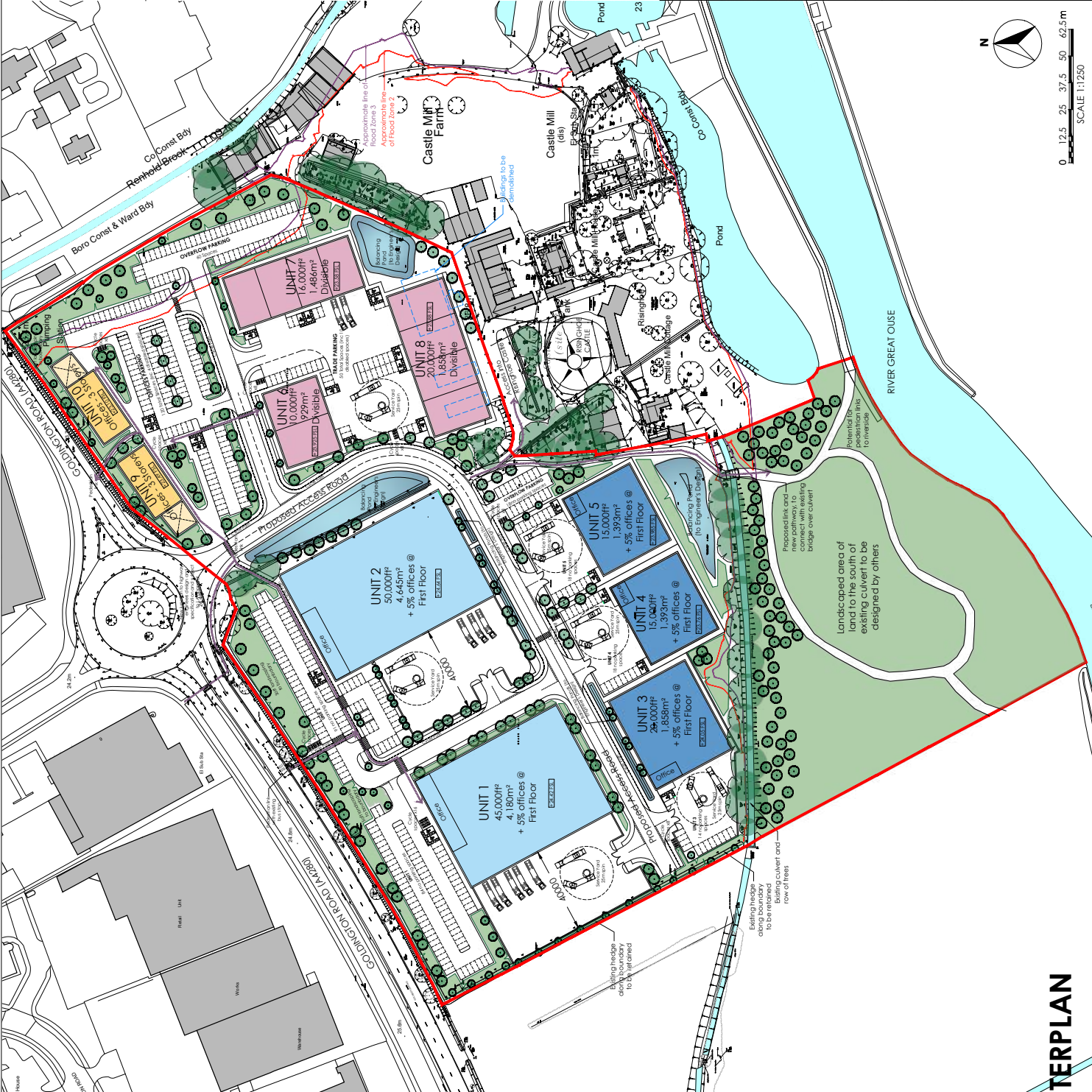
Proposed Master Plans

Note:
 Information is based on OS map and received information and is subject to full topographical and building survey.
 Assumed site boundary and site constraints subject to confirmation.
 All legal easements and extent of existing underground services locations are subject to confirmation.

SITE APPLICATION BOUNDARY
 23.33 Acres / 9.44 Hectares

+25.80 Existing levels
 72.38/5.50 Proposed finish slab levels subject to engineers design and specification

→ Pedestrian / cycle links



SCHEDULE OF ACCOMMODATION	
INDUSTRIAL/ DISTRIBUTION	
ZONE A + B	
ZONE A	4,390m ²
Unit 1	47,250m ²
Unit 2	52,500m ²
ZONE B	
Unit 3	21,000m ²
Unit 4	15,750m ²
Unit 5	15,750m ²
ZONE A + B CAR PARKING	
243 SPACES	
STARTER/TECH UNITS	
ZONE C	
Unit 6	10,000m ²
Unit 7	16,000m ²
Unit 8	20,000m ²
ZONE C CAR PARKING	
110 SPACES	
OFFICES	
ZONE D	
Unit 9	16,500m ²
Unit 10	16,500m ²
ZONE D CAR PARKING	
120 SPACES	
TOTAL	231,250m² - 21,483m²
CAR PARKING	
TOTAL - 473no SPACES (distributed throughout the site)	
CYCLE PARKING	
TOTAL - 86no Spaces (distributed throughout the site)	

PROPOSED MASTERPLAN

Scale: 0 12.5 25 37.5 50 62.5 m
 SCALE 1:1250

Client: NEWCREST
 Planning
 Scale: 1:1250 Drawing Size: A2
 Date: NOV 19 Drawn by: CM Checked by: OJC
 Drawing Title: PROPOSED MASTERPLAN

Job No: 15351-111
 Job Title: PROPOSED MASTERPLAN

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Rev	Date	Description	Rev By	CHK By
1	11.12.19	Issue for Information	AF	OJC
2	11.12.19	Issued for Information	AF	OJC
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100	11.12.19	Issued for Information	AF	OJC



Appendix Four

Brown and Lee 'Employment Market Report'

Brown & Lee LLP

15 Furzton Lake
Shirwell Crescent
Furzton
Milton Keynes MK4 1GA

T: 01908 508100**W: www.browndandlee.com**

Employment Market Report

In respect of:
Proposed Employment Development

At:
Land South of Goldington Road, Bedford

On behalf of:
Newcrest Estates Limited

December 2019

In Association with:

Brown & Lee Bedford, Stevenage & Aylesbury

Regulated by RICS

Brown & Lee is the trading name of Brown & Lee LLP | Partnership No: 0C358171

Partners

R A Dudley BSc FRICS MCI Arb
S J Magorrian BSc FRICS MCI Arb
R M Last BSc (Hons) MRICS

Consultant

S Lousada BSc MRICS

1. Introduction

- 1.1. The following assessment is provided in support of the proposals by NewCrest Estates Limited for the development of land at Goldington Road, where an application for outline planning permission is submitted for up to 21,500sqm of employment floorspace is proposed. The development will generate in the region of 600 job opportunities.
- 1.2. We have been involved in the development of the scheme from an early stage, and the range of uses proposed reflects our understanding of current market conditions in Bedford, and the nature of anticipated demand. Nevertheless, the application builds in some flexibility to accommodate the needs of future occupiers. The master plan provides an appropriate range of accommodation from offices, small terraced industrial units to larger detached industrial/distribution units.
- 1.3. Our assessment below explains our assessment of the existing market, and demonstrates that there is a need for the proposed development. In particular, we address the requirements of the Council's emerging planning policy (Policy 75S 'Additional Strategic Employment Development'), which allows for additional employment land, subject to various considerations. Of particular relevance to this report, these considerations include where there is land available elsewhere within existing or allocated employment sites that might meet the requirements; and whether there is a demonstrable need for the development at the proposed location.
- 1.4. These factors are assessed below. In doing so, we have regard to the Council's own evidence base as well as our own, considerable local knowledge and experience.

2. Proposed Scheme

2.1. By way of summary, the proposed development provides the following:

Zone	Unit	Proposed Uses	Size
Zone A: 'Storage and Distribution'	1	B8	4,390 sqm
	2	B8	4,877 sqm
		Sub Total:	9,267 sqm
Zone B: 'Warehousing and Industrial'	3	B2, B8	1,951 sqm
	4	B2, B8	1,463 sqm
	5	B2, B8	1,463 sqm
		Sub Total:	4,877 sqm
Zone C: 'Starter Units'	6	B1c, B2, B8	929 sqm
	7	B1c, B2, B8	1486 sqm
	8	B1c, B2, B8	1486 sqm
		Sub Total:	4,274 sqm
Zone D: 'Offices'	9	B1a	1,533 sqm
	10	B1a	1,533 sqm
		Sub Total:	3,066sqm
Total			21,484 sqm

2.2. It is intended that the development would be provided on a freehold basis, offering opportunities for firms to acquire their own premises.

2.3. The site fronts Goldington Road (the main easterly arterial road out of Bedford), is opposite the established Elms Farm Industrial Estate and backs onto land overlooking the River Great Ouse. It is accessed directly off the existing roundabout at the Norse Road junction and will provide a high quality street scene, particularly in comparison with the existing development opposite.

3. Bedford Borough Council – Employment Land Needs

- 3.1. In assessing the development potential for the subject site, I have sought to analyse the existing employment land supply in Bedford Borough and then relate this to the level of actual demand for commercial accommodation over the recent past.
- 3.2. It is first necessary to consider the sites that the Council has already identified. In doing so, we have referred to the following documents prepared by the Local Planning Authority:
- 'Core Strategy and Rural Issues Plan' 2008;
 - 'Allocations and Designations Local Plan' 2013;
 - 'Economy and Employment Land Study' 2015;
 - 'Employment Topic Paper' 2017;
 - 'Employment Land Needs Addendum' 2018;
 - 'Economic and Employment Topic Paper' 2018; and
 - 'Employment Monitoring Report 2018 to 2019' 2019
- 3.3. An assessment of the Council's allocations for employment land flows first from the 'Core Strategy and Rural Issues Plan' 2008. This set out a need for a minimum 16,000 net additional jobs over the period 2001 to 2021 (Policy CP10), and went on to set out a requirement for up to 75 hectares of employment land (Policy CP11) over the same period.
- 3.4. Taking account of completions and existing planning permissions, the Council's 'Allocations and Designations Local Plan' 2013 went on to allocate some 21 hectares of land. These focused on the identified growth areas, but also sought to exploit the A421 corridor. The key sites are identified in our assessment of the 'existing' land supply below.
- 3.5. The position in relation to these allocated sites was reviewed during the Council's preparation of the emerging 'Local Plan 2030', and it is appropriate to have regard to the relevant evidence base, as identified above. These are reviewed in detail in the Planning Statement that accompanies the application.
- 3.6. The 'Economy and Employment Land Study' 2015 was prepared by GVA and considered both the quantitative and qualitative need for additional employment land. In terms of qualitative matters, it remarked upon the competition with Milton Keynes and the need for Bedford to ensure that it does not lose its position, defining a unique role. Accordingly, the report indicated that the planning policy should provide sufficient flexibility to enable future changes and should not be overly prescriptive. I would concur with these observations and comments.

- 3.7. The study was updated in the 'Employment Land Needs Addendum' 2018. This focused entirely on quantitative matters and used data collected during 2017. It suggested a base case requirement for 43 hectares of additional employment land, which increased to 85 hectares for the period to 2030, to include for sensitivity analyses. This was broken down as follows:

Sector	Area
Office	53 Ha
Industrial	10 Ha
Warehouse	22 Ha
Total	85 Ha

Source (Table 9 - Bedford Land Forecast Sensitivity 4 (2017 EEFM))

- 3.8. Taking account of this assessment, the Council's most recent 'Economic and Employment Topic Paper' 2018 considered the available supply of land. It reviewed the allocations that had already been through the 'Allocations and Designations Local Plan' 2013 to consider whether they were still suitable, available and achievable. It was noted that the majority of the sites had a degree of developer interest, with the exception of Bedford River Valley.
- 3.9. The Topic Paper provided an updated list of employment sites forming part of the available supply. It excluded some sites where permission had been granted and implemented. It was considered that the 'sites available within existing employment areas and new sites comprises some 182 hectares, increasing to 198 hectares if account is taken of vacant premises. This allowance suggested that 'significant opportunities existed at Twinwoods Business Park, Thurleigh Airfield and a proposed extension to Colworth Science Park as part of the Garden Village proposals. However, the Topic Paper did quantify their potential.
- 3.10. The sites identified in the Council's Topic Paper form the basis of our analysis set out below.

4. Employment Land Take-Up Since 2017/18

- 4.1. As set out above, the 2018 report predicted a requirement for an additional 32 hectares of land for industrial and warehouse use to cater for demand over the Plan period (up to 2030).
- 4.2. However, due to structural changes in the property market, with rapid growth of online retailing, coupled with Bedford's excellent location for industrial and distribution occupiers in particular, actual take-up in this sector has very significantly exceeded the expectations described in GVA's report.
- 4.3. Over the past 2 years alone (i.e. since 2018), some of the principal commitments within Bedford Borough have included the following:

Occupier	Land Taken	Location
Travis Perkins	6 Ha	Apex site
Whistl	6 Ha	G Park
Aldi	21 Ha	Wixams
B&M	29 Ha	Wixams
Getjar	2 Ha	Stewartby
IT Efficient	1 Ha	Cardington Point
Total	65 Ha	

- 4.4. By contrast, specific office take-up fell short of the expected levels. Furthermore, as anticipated in the GVA reports, a large amount of dated office floor-space within the town centre in particular has been lost to residential use under Permitted Development Rights, and a significant B1 land supply will therefore still be required to both replace existing stock and to cater for and to cater for anticipated growth over the Plan period to 2030.

5. Bedford Employment Market – Demand

- 5.1. Brown & Lee are possibly the most active local commercial agent in the Bedford area and are therefore well placed to assess levels of demand in the various employment sectors. I believe we are aware of most occupiers' requirements where Bedford would be considered as a viable location and can confirm that over the last 12 months, we have received the following enquiries that match the accommodation proposed by this application:

Industrial Distribution	Enquiries
5 to 10,000 sqft	45
10 to 25,000 sqft	52
25 to 50,000 sqft	38
50 to 100,000 sqft	38
Total	173
Offices	
5 to 10,000 sqft	8
10 to 25,000 sqft	2
25 to 50,000 sqft	1
50 to 100,000 sqft	0
Total	11

- 5.2. It is important to note that approximately half of applicants were for freehold opportunities.
- 5.3. In light of the above, we are confident that the high levels of demand that we have recently experienced for industrial/distribution accommodation in particular, will continue for the foreseeable future.

6. Employment Market – Existing Land Supply

- 6.1. As discussed above, the Council's 'Economy and Employment Topic Paper' 2018 was prepared in support of the emerging Local Plan 2030 and provides the most up to date assessment of the existing land supply. Further information can also be gained from the Employment Land Monitor 2019 to 2019.
- 6.2. The assessment showed provision (at 2018) of some 182 hectares of employment land, including land for development within existing employment areas, and new sites and land for development. This considered that quantitatively at least, this should be sufficient to cover the Plan period up to 2030. The total area of uncommitted land amounted to 113 hectares.
- 6.3. The identified sites are as follows (omitting those sites already developed):¹

Land for Development in Existing Employment Areas

Policy	Site Name	Site Size
AD15	Manton Lane Reservoir Site, Bedford	3.3 ha
AD16	Land West of Manton Lane, Bedford	6.0 ha
E2	Land South of Cambridge Road	5.4 ha
n/a	Stewartby, Broadmead Road	2.7 ha
Sub Total		17.35 ha
Of which is uncommitted		11.35 ha

New Sites and Land for Development

AD5	Wixams Northern Expansion Area	63 ha
H14	Wixams (remaining commercial land)	8.1 ha
AD11	Land at Medbury Farm, Elstow	31 ha
AD12	Land at Bell Farm, Kempston (Bedford Logistics Park)	18 ha
AD13	Marston Vale Innovation Park Phases 1 and 2, Wootton	18 ha
AD17	Land West of B530, Kempston	3.4 ha
AD23	Bedford River Valley Park	13.5 ha
n/a	Land North of Bromham Road, Bedford	5.0 ha
n/a	Fairhill, Bedford	4.0 ha
n/a	Arkwright Road, Bedford	0.6 ha
Sub Total		164.7 ha
Of which is uncommitted		101.7 ha
Grand Total		182.0 ha
Of which is uncommitted		113.0 ha

¹ Economy and Employment Topic Paper' Appendix Three: Updated List of Employment Sites 2018

6.4. I comment on these sites and their current status, below.

6.4.1. Manton Lane Reservoir Site, Bedford

This site forms part of the Manton Lane employment area and is identified for B2 and B8 uses. The allocation estimates that approximately 1.6 hectares of the site might be developed.

The site has an extensive planning history, and permission was first granted for a firearms training centre in 2011. This, however, was never implemented. Outline planning permission was later granted in 2016 for the redevelopment of the former reservoir to provide a total of 13,838sqm of B8 and B2 employment floorspace, with ancillary office accommodation.² Again, this was never implemented.

The site is now the subject of a current outline application for the erection of a single commercial unit under Use Class B8.³ The application was submitted in the summer of 2019 but remains undetermined.

The application explains that the proposed development is intended for a specific occupier, AF Blakemore and Son Limited. The firm is seeking to provide a distribution warehouse and a building of 16,815sqm gross floorspace is proposed.

Given that an end occupier has already been identified, this site will not be available on the wider market.

6.4.2. Land West of Manton Lane, Bedford

Policy AD16 promotes approximately 6 hectares of land for use under B1(a)(b) and (c). The scale of development is restricted and the policy suggests a restriction to the height of the proposed buildings. The site lies on the edge of Bedford town.

Although allocated, it is understood that this site does not benefit from any planning permission for employment development.⁴ Most recently however, planning permission was granted on appeal at the end of last year for the development of a new private school.⁵ As such, this land is not available for employment purposes.

6.4.3. Land South of Cambridge Road

This site has since been fully developed, including the construction of Peacocks Auction House and a storage and distribution unit. Accordingly, the site is no longer available.

6.4.4. Broadmead Road, Stewartby

It is understood that this site has since been the subject of a number of applications. Most recently, the Council refused planning permission for the erection of a two storey

² Planning Permission 16/01829/MAO

³ Planning Application 19/01860/MAF

⁴ Employment Monitoring Report 2018 to 2019

⁵ Appeal Decision APP/K0235/W/18/3203051

building to provide storage, laboratories and office space.⁶ Permission was refused having regard to poor design; and the lack of parking provision. The Decision Notice was issued in the summer of 2019.

6.4.5. Wixams

Policy AD5 'Wixams Northern Expansion' allocates land to the north of Wixams for a mix of residential, employment and other community uses. The original allocation included 5 hectares of B1 'employment uses', to integrate with the committed employment area to the east of the allocation.

It is now part of a larger allocation extending to some 50 hectares, the majority of which has now been taken by the B&M and Aldi. As such, this site is largely developed, and can no longer be considered available.

The remaining land principally relates to a small area where a care village and dementia unit has been developed on part of the site. It is suggested that the remainder may be used for employment purposes, and an application for full planning permission has since been submitted for the development of five units under Use Class B1(c), B2 and B8 on 2.02 hectares of land. The proposal includes 7,358sqm gross internal floorspace.

6.4.6. Medbury Farm

Policy AD11 'Medbury Farm' proposed the development of a business park on approximately 31 hectares. While the site has been allocated for many years, no planning application has yet come forward for its development. Nevertheless, the Council considered it necessary to retain the allocation to provide for a high quality business park.

The allocation includes a series of specific requirements that must be satisfied as part of the development. This includes the submission of a flood risk assessment, and we would note that only 12-15 hectares of the allocated area falls outside the Zone 3 flood plain and would be capable of accommodating development.

Whilst allocated for employment purposes, the site is specifically intended as a business park for B1 purposes. It will not therefore offer accommodation for distribution and warehouses purposes, where the greatest demand is experienced. Furthermore, it will not offer any premises for light industrial purposes.

Taking account of the above, the allocation at Medbury Farm is not comparable to the application site and the nature of the development that is proposed there.

6.4.7. Land at Bell Farm, Kempston

This is a site of approximately 18 hectares that was allocated for a mix of employment uses under Policy AD12. It has been acquired by London and Metric, and rebranded as 'Bedford Logistics Park'.

⁶ Planning Application 19/00276/FUL

Phase 1, comprising 17,373 sqm was built speculatively in 2019, and is all now let or under offer. Phase 2, comprising 39,483 sqm is presently being marketed – but the smallest remaining unit is 15,329 sqm.

This development is therefore aimed at much larger, regional requirements than those presented in the scheme at Goldington Road. Accordingly, they will satisfy a different market.

6.4.8. Marston Vale Innovation Park, Wootton

Policy AD13 allocates some 10 hectares of land to be developed as the second phase of the Marston Vale Innovation Park. The allocation proposes a mix of office, light industrial and general industrial uses.

The first phase of this site is now being taken forward in a joint venture between Goodman and Bedford Borough Council. It has been rebranded as 'Bedford Commercial Park'. Approximately 40% of the 18 hectares that has already been developed (i.e. 7 hectares) provides a single unit of 37,810sqm. This is expected to let shortly. Construction on a further 3 hectares is expected to take place during 2020 for distribution units of 2,700-4,600sqm. This leaves a further 8 hectares remaining, of which some 2.5 hectares is being now marketed for a single distribution unit of 12,000sqm.

Based on current levels of demand, it is expected that this scheme to be fully let or sold within the next two to three years.

6.4.9. Land West of B530, Kempston

This site is 3.4 hectares in site and is intended for B1, B2 and B8 uses. The allocation recognises that the site was allocated in previous plans, but as the majority of the land is within Flood Zone 3, no development proposals have been forthcoming.

It is suggested that works including the provision of balancing ponds to the south of the A421 might now allow flood compensation, and so the allocation was retained. It remains the case though, that no planning application has been forthcoming,⁷ and it is unlikely that this site will be developed.

6.4.10. Bedford River Valley Park

Policy AD23 allocates 'Bedford River Valley Park Enabling Development' on land to the north of the A603. As well as promoting leisure uses such as a hotel and conference centre, the allocation includes the provision of B1 uses. This is aimed as the provision of a 'business park including opportunities for research and development'.

In our view, this development is likely to be a longer term aspiration. Few, if any, landowner agreements are in place, the vast majority of the land is within the flood plain. Furthermore, the employment element forms only part of a much larger scheme, and is clearly aimed at a very specific market, namely the office market, and

⁷ Employment Monitoring Report 2018 to 2019

research. Industrial and distribution uses would be incompatible with the wider proposals that are focused on leisure activities.

6.4.11. Land North of Bromham Road, Bedford

The Council's Topic Paper confirms that outline planning permission has been granted for the development of this site. It is not therefore available.

6.4.12. Fairhill, Bedford

This site now benefits from planning permission for the development of a brewery, together with outline approval for other uses including B1, B2, and B8 uses.⁸ Overall however, the total amount of land to be used for employment purposes is just 1.62 hectares, including the proposed brewery. The approved scheme also included leisure uses such as a hotel (1.04 hectares), and leisure provision (2.02 hectares).

Consequently, the quantity of employment development that will be delivered on the site will be limited, and less than half of that originally envisaged.

6.4.13. Arkwright Road, Bedford

The Topic Paper noted that planning permission had been granted for the development of 23 small units under Use Class B1 and B8.⁹ Relevant conditions have since been discharged.

Planning permission was first granted for the development of the site in 2013, but this lapsed. More recently, permission was granted for a development which included 2,860 sqm of gross internal employment floorspace within two buildings.¹⁰ These were to provide 23 smaller units of B1, B2 and B8 units. It is understood that applications to discharge relevant pre-start conditions were submitted and the development has progressed.

It is clear that this proposal is of a very different scale and nature to that proposed at Goldington Road.

⁸ Planning Permission Reference 18/02231/MDC4

⁹ Planning Permission Reference 18/00579/MAF

¹⁰ Planning Permission 18/00579/MAF

- 6.5. This assessment shows that while the Council's identified list of site indicates that there is some 182 hectares of land available (including both land within existing employment areas and new sites), a significant amount of this land is already committed. The Council's Topic Paper showed that in 2018, some 113 hectares was uncommitted. However, our updated review shows that since then, there have been further developments and many of the site are no longer available.
- 6.6. We estimate that around 75% of the land is already let to large occupiers, with the remaining 25% being actively marketed for pre-letting and, in our informed opinion, likely to be taken within the next 2 to 3 years. Equally, the majority of this 25% is intended to provide industrial/distribution units of much larger size than those proposed at the subject site.
- 6.7. On the basis of our assessment, we estimate that now, only approximately 40% of the identified sites are uncommitted. Furthermore, there are questions over the deliverability (at least in the short to medium term) of these remaining sites, most notably Medbury Farm and Bedford Valley River Park. If these sites are excluded, then the quantity of uncommitted land falls to around just 25 hectares, - i.e. only 15% of the identified supply is uncommitted.
- 6.8. Accordingly, it is clear that within just a very short period, the Council's anticipated supply of employment land has already been accounted for and that additional land is required if demand is to be met.
- 6.9. Furthermore, this assessment deals only with quantitative need, and as discussed above, the Council's evidence base has recognised that further qualitative need exists and should be accommodated within the policy framework.

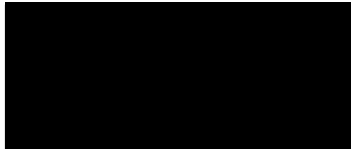
7. Summary and Conclusion

- 7.1. In conclusion, we consider that there is clear demand for additional employment land. While on the face of it, the Council's Local Plan appears to make sufficient quantitative provision, a considerable proportion of the available land has already been accounted for. Within just two years, some 65 hectares has been taken by occupiers, and further land is already being developed.
- 7.2. The future quantitative supply is reliant upon two key sites, namely Medbury Farm and Bedford River Valley. While these may be developed in the future, it is our view that they are unlikely to emerge within the immediate term. They have been allocated for many years, yet not subject to any planning application.
- 7.3. Based upon the levels of take up experienced over the past 2 to 3 years, it is easy to see that demand will almost certainly outstrip the remaining allocated supply of employment land well in advance of the end of the Plan period in 2030, particularly in the industrial and distribution sectors.
- 7.4. This quantitative need is exacerbated when the qualitative demand is taken into account. This has been well documented and there is a need for Bedford to provide new employment land to compete with neighbouring locations, and to maximise the economic growth opportunities afforded by the A421 corridor and the excellent connections to the strategic road network. The application site at Goldington Road is well placed to help meet this qualitative need.
- 7.5. It should also be noted that there is an almost complete lack of freeholds above the small units size range, despite that fact that almost half of the enquiries we receive are from occupiers who want to own their property rather than lease. Therefore, there is a real and demonstrable need which is unmet and which will hold back inward investment and economic development.
- 7.6. In addition, apart from the 3M Hudson Road site on Elms Farm, there are no employment land allocations to the east of the Bedford. This is significant as a great deal of demand is focussed on the A1, rather than the M1, and there is almost no supply of land or buildings to the A1 southern corridor. Recent take up at Biggleswade provides evidence for this, as 116 acres of employment land has been sold recently, all of which is already committed to occupiers with currently no further supply. A well located site on the eastern edge of Bedford would be seen as a viable option for these occupiers, pulling jobs, Business Rates and investment into the Borough rather than these going elsewhere to the east.
- 7.7. With regard to B1 office allocations, whilst on a quantitative basis it could be argued that there is sufficient allocation of land within the Borough as a whole, this is almost entirely focussed to the south at Medbury and Bedford Commercial Park, quite remote from the town itself. The relative small allocation of 3,066 sqm at the subject site would be a welcome addition to Bedford's offering and provide occupiers with a viable option on the edge of town, close to a large resident population and with excellent transport links to both the town centre and the A428 and A421.

8. Conclusion and Recommendation

- 8.1. Given the above, we fully support this proposed development and recommend it proceeds. The range of buildings and timing would satisfy the continued market demand and help fill a gap in Bedford's employment land supply. Its range of units would provide for both the local market and inward regional demand, particularly given that freeholds would be offered, which is unusual and attractive to local longstanding occupiers.

- 8.2. Furthermore, the site's location to the east of Bedford would be a welcome addition to the stock, as an alternative to almost all of the other allocated strategic sites which are actually closer to the M1 than they are the subject site. In fact, with the majority of Bedford's housing being to the north of the town in districts such as Brickhill, Putnoe, Newnham etc, the large employment allocations in Kempston and Wootton represent a significant journey for these residents and a reasonable employment allocation to the north east of town would provide a most welcome and sustainable option.



Policy	Site Name	2018	Updated 2019
AD15	Manton Lane Reservoir Site, Bedford	3.25	3.25 Subject to current application for food distribution warehouse
AD16	Land West of Manton Lane, Bedford	6	0 Permission now granted on appeal for school
E2	Land South of Cambridge Road	5.4	0 Now developed at Peacocks Auction House etc
n/a	Stewartby, Broadmead Road	2.7	2.7 Subject to a recent application, refused on parking grounds
Sub Total		17.35	
Of which is uncommitted		11.35	5.95
New Sites and Land for Development			
AD5	Wixams Northern Expansion Area	63	0 Largely already development
H14	Wixams (remaining commercial land)	8.1	6 Subject to current application for B2, B8
AD11	Land at Medbury Farm, Elstow	31	31 Not been subject to any application
AD12	Land at Bell Farm, Kempston (Bedford Logistics Park)	18	0
AD13	Marston Vale Innovation Park Phases 1 and 2, Wootton	18	8 Largely developed already
AD17	Land West of B530, Kempston	3.4	3.4 No planning application ever forthcoming - in flood zone. Unlikely.
AD23	Bedford River Valley Park	13.5	13.5 Aspirational. No landowner agreements.
n/a	Land North of Bromham Road, Bedford	5	0 Outline permission granted.
n/a	Fairhill, Bedford	4	1.62 Area of land that will be used for employment
n/a	Arkwright Road, Bedford	0.6	0 Permission granted
Sub Total		164.6	
Of which is uncommitted		101.7	63.52
Grand Total		181.95	
Of which is uncommitted		113.05	69.47
		62%	38%

