



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

Our Ref: 70076455
13 August 2020

Dear Sir/Madam,

**BEDFORD BOROUGH COUNCIL CALL FOR SITES
ROXTON GARDEN CENTRE, BEDFORD ROAD, ROXTON MK44 3DY**

We write on behalf of our client, [REDACTED], to submit representations to promote the allocation of Roxton Garden Centre for employment purposes (primarily for Use Class B8 storage and distribution) as well as for roadside/retail uses.

The extent of the site being promoted is shown on the Site Location Plan and extends to circa 4.9ha, of which approximately 2ha represents previously developed land.

The site is located off Bedford Road circa 500m to the north east of Roxton and circa 350m to the south west of the Black Cat roundabout and existing Black Cat Service Station. The Black Cat roundabout forms part of a major highways improvement scheme for the Oxford-Cambridge growth arc, a corridor identified for housing and employment growth as well as for highway and rail improvements. This includes proposals to upgrade the A421 creating a new dual carriageway between the Black Cat roundabout and Caxton Gibbet roundabout which requires the north eastern part of the Garden Centre site as part of the construction works. The existing Black Cat Service Station which includes a Travelodge and petrol station will also be demolished as part of this scheme. As such the area around the Garden Centre will change significantly.

Therefore, in light of this we are seeking to promote the site for employment uses (primarily for B8 use) as well as for roadside/retail uses to replace the Black Cat Service Station.

In addition to this cover letter, this submission comprises the following documents:

- Call for Sites Form;
- Site Location Plan; and
- Highways England's consultation map.

The Site

The site comprises the existing garden centre buildings, glasshouses, polytunnels and warehouse, large areas of parking and external plant sale areas, a farm shop, a 200-seat restaurant, a home brewing company, a home improvement company, a maze, an existing residential bungalow, as well as two fields operating as overflow car parking.



The main buildings on the site face Bedford Road and are constructed of mixed external materials that result in an industrial appearance due to the use of corrugated metal and the multi-ridged industrial roof design.

Whilst the site is located within the open countryside as identified on the adopted Bedford Local Plan 2030 interactive map, it comprises several large structures which are self-contained with trees and hedgerows along the boundaries of the site, which help to screen the Garden Centre from the surrounding area. Of note, in the Council's consideration of an application for the change of use of the garden centre shop to Class A1 retail and for an extension to the shop (Ref. 16/01957/FUL), the planning officer recognised that the mature tree lined boundaries of the site and the siting of the built footprint set back from Bedford Road, limits its visibility in the surrounding countryside.

The site is also served by public transport, within 300m of a bus stop on Roxton Road South.

The site lies within Flood Zone 1, at low risk of flooding and it is not located within a conservation area or include any listed buildings.

Surrounding Area

As previously highlighted the site is located circa 350m south of the Black Cat roundabout which connects Bedford (A421), the A428 and the Great North Road (A1) and provides direct access to the site and the settlements of Roxton and Great Barford.

Highways England's infrastructure proposal to upgrade the A421 comprises major works to the route between the Black Cat roundabout and Caxton Gibbet roundabout through the provision of a new 10-mile dual carriageway and several junction improvements including:

- The A1 passing under the new Black Cat roundabout below ground level;
- A new and larger Black Cat roundabout at ground level; and
- The new dual carriageway (A421 extension) passing over the Black Cat roundabout above the existing ground level.

The highway works are expected to start in 2022 and completed by 2025/2026.

Highways England's current consultation provides a supplementary consultation map (enclosed with these representations) detailing the proposed works to support the A428 Black Cat to Caxton Gibbet upgrade. Due to the close proximity of Roxton Garden Centre to these proposals, the north eastern part of the site is identified for temporary acquisition to enable construction works.

Furthermore, conversations are ongoing between the garden centre and Highways England, with a new access point to the site agreed (detailed by the bell mouth on the attached map) to enable the required works.

Also significant to our representations, the consultation map identifies the permanent acquisition and redevelopment of the land which comprises the existing Black Cat Service Station, for the provision of a new slip road to the A1 northbound.

In summary the proposed highway works will result in significant landscape changes to the open countryside in the immediate vicinity of the site. The existing roundabout will be redeveloped and replaced by a more visually prominent structure and associated developments that interrupt the flat, open countryside views to the north, east and west of the site. It will result in the loss of existing roadside services, whilst increasing the number of road users in the area.



Policy Background

National Policy

National Planning Policy Framework (NPPF) provides a presumption in favour of sustainable development. It requires local planning authorities to meet their objectively assessed development needs and to respond positively for wider opportunities for growth.

Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development which confirms that plans should positively seek opportunities to meet the development needs of the area and be flexible to adapt to rapid change.

Paragraph 80 states that planning policies should help to create the conditions for the investment, expansion and adaptation of businesses, with significant weight placed on those supporting economic growth and wider development opportunities.

Paragraph 83 supports sustainable growth and expansion of all types of businesses in rural areas.

Furthermore, the NPPF promotes the effective use of land for meeting needs and supports the development of under-utilised land and buildings where sites could be used more effectively (Paragraphs 117 – 118).

Paragraphs 120 – 121 seek to secure alternative uses on land which is currently developed but not allocated for a specific purpose.

Finally, paragraph 122 supports development that makes efficient use of land, especially where it takes into account infrastructure and where they maintain an existing character or promote regeneration and change.

Local Policy

As highlighted above the site is located in the countryside as defined on the proposals map for the Bedford Local Plan 2030 (adopted in January 2020), circa 500m to the north east of the defined Settlement Policy Area boundary of the rural service centre of Roxton (Policy 3S).

Local Plan Policy 3S relates to the borough's spatial strategy, and states that new development will be required to build upon and expand the employment base for settlements, with a focus on strategic locations related to the primary road network.

Policy 7S relates to development in the countryside providing scope for the re-use or redevelopment of such sites if the proposal responds to an identified need and it can be demonstrated that the site is well related to its neighbouring settlement.

Policy 46S covers the use of previously developed land and undeveloped land, stating that: *"The Council will seek to maximise the delivery of development through the reuse of suitably located previously developed land provided that it is not of high environmental or biodiversity value."*

Chapter 11 sets out the Council's economic position, identifying an employment land supply of 198ha which is considered sufficient to provide for the minimum 6,900 net additional jobs required by 2030. However, it is recognised that 58% (113ha) of the identified employment land supply remains uncommitted (based on the Employment Land Needs Addendum (2018)).

Policy 76 supports the provision of new visitor accommodation in the countryside where it is well related to a local settlement, including rural service centres such as Roxton.



Suitability of Site for Employment Land (Primarily Use Class B8)

Impact on Surrounding Countryside

Whilst the site lies within the countryside, it is located only 350m south west of the Black Cat roundabout, and to the east of the A1 and south of the A421 which are subject to significant highway improvement works.

Land surrounding the site is proposed to be redeveloped to support the works, including the provision of ponds, ditches, a new side road and storage, as well as areas dedicated to support the construction phase. Part of the site is also required as part of the construction works. These operations and works will therefore change the character and appearance of part of the site as well as the surrounding fields. The highway proposals which include widening both the A1 and A421 as well as a new multi-level roundabout will increase the amount of built form in the area and result in a raised highway (i.e. the new dual carriageway which will pass over the roundabout).

As such, the character of the surrounding area will change as a result of these proposals.

The site already includes several large buildings which have an industrial appearance and hardstanding areas and is already in commercial use. It is also bordered by trees and hedgerows which help to screen it from the surrounding countryside as previously recognised by the Council.

Therefore, the redevelopment of the site for employment purposes (primarily storage and distribution), especially on the previously developed part will have a limited impact upon the surrounding landscape and character of the area, and importantly it will be less prominent than the new highway structures. It will also not impact on the existing separation between the built settlement boundary of Roxton and the site.

Moreover, the NPPF promotes the redevelopment of brownfield sites such as that proposed where they can improve densities and the redevelopment of under-utilised buildings.

Finally, it is acknowledged that archaeological interest has been registered in proximity to the Garden Centre site, specifically in reference to historic record 'CROPMARKS, North East of Roxton village' (HER no. 1833). In conjunction with their proposals to undertake works in the immediate vicinity of the site as well within it, Highways England have undertaken investigations and trenching in the parcel they would temporarily acquire, as well as the land parcel associated with the maze. They are recording any findings and generating reports which will inform any future proposals within the site, to ensure the protection of any artefacts found.

Need for Employment Land

As identified within the Employment Land Needs Addendum (2018) and Chapter 11 of the Bedford Borough Local Plan 2030 sets out the Council's economic position with paragraphs 11.6-11.8 stating that the Council has an employment land supply of 198ha, which they consider to be sufficient to provide the minimum of 6,900 net additional jobs required up by 2030 in the borough. The Local Plan, however, acknowledges that 58% of the identified employment land remains uncommitted. As such it must be questionable whether this land will actually come forward in the Plan period to 2030.

In contrast to this, the Roxton Garden Centre site is available in the short term and achievable, and represents an appropriate site for employment uses, especially for storage and distribution given



its excellent road links to both the A1 and A421 which are subject to major road improvements further improving the connectivity of the site.

The allocation of the site for employment land (primarily Class B8) would also ensure the retention and expansion of employment opportunities on the site for local residents, increasing employment densities on a brownfield site, and on a key location within the Oxford-Cambridge Growth Arc and an area identified by the Council as having good transport links in the current Local Plan consultation.

The Council should support the redevelopment of such land where it would help to meet identified needs in accordance with paragraph 121 of the NPPF.

The site would therefore positively contribute to the employment land requirements of the Council, whilst benefitting from the proposed major infrastructure improvements and investment by Highways England and would provide additional employment and business opportunities to support the local economy.

Suitability for Roadside/Retail uses

Impact on Surrounding Countryside

As highlighted above, the existing buildings on the site have a negligible impact upon the surrounding landscape due to their siting, the natural tree-lined boundaries of the site and their relatively low-level built form. Notwithstanding this the character of the surrounding area is going to significantly change as a result of the highway improvement works, including an increased amount of built form and a new raised Black Cat roundabout which will be more visually prominent in the landscape.

The redevelopment of the site for roadside and retail uses would remain in keeping with the existing commercial character of the site which includes shops, businesses and a large restaurant, whilst it could be sensitively designed and additional landscaping could be provided to further limit its impact of the surrounding countryside.

As such the allocation of the site for retail and roadside uses would have a negligible impact upon the landscape and character of the surrounding countryside.

Need for Retail and Roadside Uses

The existing Black Cat Service Station is being redeveloped to allow for the required slip road from the widened A421 onto the A1 northbound. There will therefore be a need for a replacement facility to serve both road users as well as local residents.

Given that Roxton Garden Centre is already in retail use and is located in close proximity to both the A421 and A1, it represents an excellent opportunity to provide such replacement roadside and retail uses (i.e. a new service station). Such a proposal will also result in economic benefits for the surrounding area including new employment opportunities as well as new investment.

A roadside hotel would also replace the loss of the existing Travelodge, ensuring continued provision for tourism accommodation to support leisure and business visitors in the local area, as well complementing the proposed highway upgrades to increase road capacity. The Bedford Borough Hotel Futures Update (2014) identified a frequent shortage of hotel accommodation in the Wyboston area, which includes Wyboston Lakes and acknowledged the existing Travelodge at the



Black Cat roundabout as a hotel operator in the area. As such, a replacement hotel at the site would provide much needed new accommodation for visitors to the Wyboston area, including to the lakes.

In summary, the allocation of the site for roadside/retail uses is considered to meet a future need for such facilities, whilst supporting the local economy and the proposed highways works, in accordance with the NPPF.

Summary

In summary, Roxton Garden Centre represents an appropriate, available and suitable site for the provision of employment land (Class B8) and roadside/retail uses (i.e. a new service station). On this basis we request that the site is allocated in the emerging Local Plan for such uses which will have significant planning merits, addressing the needs of the area and contributing positively to the future growth of the borough.

The landowner would be happy to meet and discuss any queries that you may have and the potential next steps to secure the allocation of the site as part of the Local Plan Review. However, in the meantime should you require any further information please do not hesitate to contact me.

Yours faithfully

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