

BEDFORD BOROUGH LOCAL PLAN 2040

(REGULATION 18)

SEPTEMBER 2021 REPRESENTATIONS



Client: The Executors of the late Nigel Alington
Project: Alington Estate, Little Barford
LP policy ref: Site Assessment Pro Formas, June 2021
LP para ref: Sites IDs 872, 873, 892 and 907
Nature of comment: Partial support / partial objection
Date: 3 September 2021

1 Introduction

- 1.1 These representations have been prepared by CODE Development Planners on behalf of the Executors of the late Nigel Alington in relation to the draft policies and evidence base of the regulation 18 Bedford Borough Local Plan 2040 (BBLP 2040). These representations are for land at Little Barford, east and west of Barford Road, east of the East Coast Mainline railway (ECM) and west of the Black Cat to Caxton Gibbet A428 road improvement (refer to enclosed drawing 068-001-012).
- 1.2 These representations and the accompanying technical documents demonstrate that further assessments and refinements to the proposals submitted to the call for sites and issues and options consultations during August and September 2020, have improved the proposals' scores when assessed against Bedford Borough Council's (BBC) Site Selection Methodology, June 2021.
- 1.3 These representations are accompanied and supported by the following technical documents:
- Drawing 068-001-012: Areas available for local plan promotion;
 - Drawing 60830-PP-500 A: Highway access and development parcels – new settlement (BBLP 2040 reg 18 options 2b, 2c and 2d);
 - Drawing 60830-PP-501: Highway access and development parcels – parish growth (BBLP 2040 reg 18 option 2d);
 - Preliminary Ecological Appraisal, September 2021 (issue 3) prepared by Southern Ecological Solutions;
 - Botany Assessment of Grassland Component of Little Barford CWS, September 2021 (issue 2) prepared by Southern Ecological Solutions;
 - Botany Assessment of RWE Buffer, September 2021 (issue 3) prepared by Southern Ecological Solutions;
 - Transport Assessment, September 2021 prepared by Richard Jackson Ltd incorporating the following:
 - Drawing 60830-PP-014A: Sustainable travel options plan;



- Drawing 60830-PP-017: Proposed A428 grade separated junction location;
- Drawing 60830-S-004: Bridge at section 2 general arrangements and typical details;
- Drawing 60830-S-005: Bridge at section 9 general arrangements and typical details;
- Sustainable Transportation Technical Note, September 2021;
- Site Specific Flood Risk Assessment (FRA), June 2021 (revision A) prepared by Richard Jackson Ltd;
- Surface Water Strategy, August 2021 prepared by Richard Jackson Ltd incorporating the following:
 - Drawing 60830-PP-200: Surface water strategy (sheet 1 of 5);
 - Drawing 60830-PP-201: Surface water strategy (sheet 2 of 5);
 - Drawing 60830-PP-202: Surface water strategy (sheet 3 of 5);
 - Drawing 60830-PP-203: Surface water strategy (sheet 4 of 5);
 - Drawing 60830-PP-204: Surface water strategy (sheet 5 of 5);
- Services Technical Note, September 2021 prepared by Richard Jackson Ltd incorporating the following:
 - Drawing 60830-PP-100A: Existing service records (sheet 1 of 5);
 - Drawing 60830-PP-101A: Existing service records (sheet 2 of 5);
 - Drawing 60830-PP-102: Existing service records (sheet 3 of 5);
 - Drawing 60830-PP-103: Existing service records (sheet 4 of 5);
 - Drawing 60830-PP-104: Existing service records (sheet 5 of 5);
- Tree Constraints Report, September 2021 (revision A) prepared by Southern Ecological Solutions incorporating the following:
 - Tree Survey Schedule;
 - Tree Survey and Constraints Plan.

2 Proposals being promoted

- 2.1 The three proposals (AL1, AL2 and AL3) submitted during the call for sites and issues and options stages of local plan preparation are superseded by two proposals, one for a new settlement and the other for parish growth as outlined in the Growth and Spatial Strategy Options 2b, 2c and 2d of the BBLP 2040 – Draft Plan Strategy Options and Draft Policies Consultation, June 2021 (refer to drawings 60830-PP-500 A and 60830-PP-501).
- 2.2 This site areas are 310 ha for the new settlement proposal and 28.68 ha for the parish growth proposal. In both scenarios not all the land is proposed for development. Technical assessments are on-going to establish a net developable area and a capacity study will be submitted at an appropriate stage in the preparation of the BBLP 2040.
- 2.3 Based on technical assessments undertaken to date (the scope of which is considered proportionate to this stage of the preparation of the BBLP-2040) the new settlement proposal is capable of delivering circa 4,000 new homes and circa 3.61 ha of employment land. The parish growth proposal is capable



of delivering circa 200 new homes circa 3.61 ha of employment land. Development of the chosen proposal will be supported by appropriate infrastructure.

3 **Site Selection Methodology Sustainability Objective Questions**

3.1 BBC has tested the sustainability of each site by asking a series of assessment questions in relation to sustainability objectives. Paragraph 4 of the BBLP 2040 Site Assessment Pro Formas, June 2021 document states, *“At this stage, factual and technical information is being gathered about the site submissions and it is important to note that this site assessment work is not yet complete.”* To assist BBC in this process this representation includes information to enable BBC to update the responses to the assessment questions.

3.2 The following sections correspond with those set out in BBC’s Site Selection Methodology, June 2021. Each of the following sections begin with the assessment question/s posed under each topic heading within the Site Selection Methodology and the score given to the proposals (in the form they were submitted to the call for sites and issues and options stages of local plan preparation) in the Site Assessment Pro Formas, June 2021. Where necessary these representations provide updated information from the technical reports prepared on behalf of the Executors and/or refinements to the proposals resulting from the technical reports.

4 **Sustainability objective | assessment question | air quality - improve air quality**

1a Within or adjoining the urban area, a defined settlement policy area or the built form of a small settlement?

4.1 It is recognised that the proposals being promoted at Little Barford (parish growth (transport corridor: east) option and new settlement option) are *“not within or adjoining the urban area or a defined settlement policy area, or within the built form of a small settlement”* as defined by policies S5 and 6 of the BBLP 2030. However, the Site Selection Methodology, June 2021 does not include criteria which assess the positive impact an allocation could have on the preservation and enhancement of settlement features of those settlements which currently do not consist of 30 or more dwellings, regardless of whether the settlement comprises a distinct group of buildings. The village of Little Barford contains several listed buildings and other non-designated settlement features which would benefit from sensitive new development to enhance the vitality of place and viability of suitable uses for some of the vacant listed buildings.

4.2 The proposals would create a defined settlement policy area for Little Barford. We support the growth and spatial strategy options, 2b, 2c and 2d set out in the BBLP 2040 Draft Plan Strategy Options and Draft Policies Consultation document. These provide a framework for allocations at Little Barford of a scale that could facilitate the preservation and enhancement of its existing settlement features.



- 4.3 With significant planned strategic, infrastructure development in the form of the A428 Black Cat to Caxton Gibbet, road improvement and potential future strategic infrastructure related to East West Rail (EWR) routes and station options, in or in close proximity to the parish of Little Barford, a plan led approach is needed. Paragraph 15 of the National Planning Policy Framework (NPPF) requires that *“plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities”*. Paragraph 190 of the NPPF goes on to state that, *“Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:*
- a) *the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*
 - b) *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
 - c) *the desirability of new development making a positive contribution to local character and distinctiveness; and*
 - d) *opportunities to draw on the contribution made by the historic environment to the character of place.”*

- 4.4 The new settlement proposal for circa 4,000 new dwellings and associated infrastructure is proposed to cater for the day to day needs of its residents. In the early years higher order facilities will be accessed in St Neots. Early provision of facilities and community infrastructure will support the residents of the new settlement. A sustainable transport technical note has been submitted with these representations proposing a cycleway/footway between the development (parish growth and new settlement) and St Neots and the phased provision of further cycleways and public transport provision as the development progresses. Again, we consider that proposals for parish growth or new settlement at Little Barford would create a new “settlement policy area.”

1b [Accessibility on foot to a food store?](#)

- 4.5 The parish growth option proposal for the Alington Estate would rely on St Neots for access to day to day and higher order facilities. Subject to the timing of community infrastructure as part of the new settlement proposal it is possible that residents of the early phases of the development will access the higher order facilities in St Neots. Access to these facilities is proposed via on and off-site improvements to pedestrian and cycle routes (refer to drawing 60830-PP-014A: Sustainable travel options plan). The Sustainable Transportation Technical Note, September 2021 provides details for the provision of shared use cycleways from the northern access of the site into St Neots. These proposals also include road crossing facilities at the existing A428 and B1043, providing future residents with safe and convenient foot or cycle access to the Tesco superstore located in St Neots.



- 4.6 Additionally, the proposed B1043 crossing location has been identified as part of an existing 'desire line' for pedestrians from the housing developments to the east in St Neots. The proposals provide betterment for these users through the provision of a safe crossing point across the B1043.
- 4.7 The Sustainable Transportation Technical Note, September 2021 sets out proposals for providing access to identified locations. The new settlement option at Little Barford includes the onsite provision of a 2ha site for a supermarket, schools and other facilities to establish, within the new settlement, an area that will function as a "key service centre". Details of the timing of provision of sustainable travel measures and other infrastructure associated with the development, including on site services and facilities, will be considered at a later stage in the preparation of the BBLP 2040.

1c Accessible on foot to a primary school?

- 4.8 A proposal for a new settlement at the Alington Estate, Little Barford is of a scale that includes on site provision of two primary and one all through school (or one secondary school and one additional primary school). It is anticipated that the number of schools and the number of forms of entry will be defined in the policy wording associated with the allocation of a new settlement. On site provision of schools will require the local education authority to share formal playing pitches with the community. The location of these facilities will be designed to create safe routes to schools to encourage pupils to walk and cycle between home and facilities.
- 4.9 On site services and facilities including a network of sustainable travel measures will be provided as the development phases progress. Phases will accord with an agreed phasing strategy to ensure development and infrastructure is delivered to achieve sustainable development.

1d Accessible on foot or by bus to a major employer?

- 4.10 In addition, the proposals' (parish growth and new settlement options) inclusion circa 3.61 ha of employment land, RWE's gas power plant and the Alington Road Industrial Estate are walking distance from the site. Drawing 60830-PP-014A: Sustainable travel options identifies the pedestrian and cycle infrastructure improvements proposed as part of the proposals.
- 4.11 Currently the public transport for Little Barford is of a poor standard where only a single service runs between Biggleswade and St Neots on a Thursday. The drawing also identifies the principle for a bus route through the site. The proposed public transport scheme would greatly enhance accessibility to public transport and all development would ideally be within 400m of the main public transport corridors. Bus services would run at an improved frequency to meet demand and local policy. Until the location of the EWR station is known it is anticipated that the destination for the bus would be St Neots town centre, passing the Tesco's store, leisure centre and Ernulf Academy for secondary education.
- 4.12 Land east of the East Coast Mainline (ECM) railway within the new settlement proposal at the Alington Estate would be approximately 1,200m from the proposed bus route. To ensure public transport



remains an attractive option the bus route could be diverted into the development parcel and then return to Barford Road on an occasional basis. Additional consideration will be given to the inclusion within the site of a public transport hub to assist residents walking or cycling from east of the ECM with access to the bus service.

1e Outside, adjoining or within the air quality management area?

4.13 The site is not within or adjoining the air quality management area.

5 **Sustainability objective | assessment question | biodiversity and green infrastructure – protect, maintain and enhance biodiversity and habitats**

2a Within or adjoining a site of nature conservation importance / habitat or principal importance / within the impact risk zone of a SSSI / Natura 2000 site?

5.1 A County Wildlife Site (CWS) is located on land within the Alington Estate. The CWS designation covers the field between Lower Farm Barns and St Deny's Church, the adjacent grazed field to the south of the access track to the Church and an area of wetlands/wet woodlands adjacent to the River Great Ouse.

5.2 Following the call for sites submission further assessments have been undertaken which have resulted in the field between St Deny's Church and Lower Farm Barns being excluded from development. The field to the south is also excluded from development. The western areas of wetland and wet woodland are located within the flood zone and, as explained in the submitted Flood Risk Assessment, are not proposed for development.

5.3 Although this does not form part of parish growth option it is included as part of the new settlement option. However, although no development is proposed on the CWS, it is included within the land proposed for a new settlement allocation so that an appropriate programme of management can be implemented which may over time enhance the grassland habitats (refer to Botany Assessment of Grassland Component of Little Barford CWS, September 2021). Areas within the extent of the CWS are also of heritage interest and the opportunity exists through the allocation of the new settlement proposal to provide interpretation media and sensitively create a resource accessible to the public as multi-functional informal recreational open space.

2b In an area where protected species are known or likely to exist?

5.4 An extended phase one habitat survey has been undertaken in respect of land within the Alington Estate, west of the ECM (refer to Preliminary Ecological Appraisal, September 2021 (PEA)). The assessment confirmed that the part of the site surveyed has the potential to support protected and notable species of flora and fauna and concluded that the site supports a range of protected and priority



habitats predominantly within the area west of the Barford Road, much of which is within or adjacent to the River Great Ouse floodplain. There are also extensive areas of lower value, farmland habitats east of the Barford Road and west of the ECM. The areas surveyed provide suitable habitat for a number of protected and/or notable species.

- 5.5 Having established the site supports a range of protected species the likely impacts, mitigations and enhancement measures have been considered. The PEA concludes that with suitable measures there will be no negative residual effects associated with the development. Further details can be seen in table 8 of the PEA.
- 5.6 The remainder of the site being promoted for a new settlement (land east of the ECM and west of the A428 improvement) will be surveyed ahead of the regulation 19 consultation for the BBLP 2040. Due to time constraints the focus has been to survey land west of the ECM. Any issues in this area from an ecological perspective might, together with other potential constraints such as heritage, high pressure gas main and high voltage overhead powerline had the potential for a greater impact on the deliver of housing numbers. There is sufficient flexibility in the size of the area of land on the east of the ECM to satisfactorily address ecological constraints that might arise.

2c Potentially able to achieve a net gain in biodiversity on site?

- 5.7 A PEA has been undertaken for the site and established that, “*Through incorporation of further surveys, mitigation and precautionary methods, it is considered that the site could deliver a significant biodiversity net gain in terms of measures to support high value habitats and protected species and to carry this out in line with current wildlife legislation, chapter 15 of the NPPF (MHCLG, 2021); and local planning policies relevant to ecology.*” (Paragraph 5.2, p.26, PEA, SES). The proposed development provides an opportunity to deliver landscape scale biodiversity benefits that enhance habitats within and adjacent to the River Great Ouse floodplain and strengthen the ecological connectivity for priority habitats and protected and notable species.

2d Able to link into the green infrastructure opportunity network?

- 5.8 The most western area of the site is within the Lower Great Ouse River Valley green infrastructure opportunity zone under Policy AD24 of the Bedford Borough Allocations and Designations Local Plan, July 2013. The policy has identified six areas across the borough where there is the greatest potential to maintain and enhance the multi-functional nature of green infrastructure against five themes of landscape, historic environment, biodiversity, accessible green space and access routes.
- 5.9 The sustainable transportation technical note submitted as part of these representations provides details on how a Public Right of Way (PRoW) is within the development parcel from the northwest corner of development near the southwest corner of the power station providing a sustainable link to St Neots. It is suggested that the route is suitable for a recreational footpath and riverside walk



(paragraph 2.4, pg. 2, Sustainable Transportation Technical Note, September 2021). The existing footpath heads north through an area of woodland that has the potential as part of a new settlement allocation for enhancement including seating, way markings or information boards with items of interest (wildlife, heritage etc) identified. The enhancement of the 'green access routes' accords with the Lower Great Ouse River Valley specific targets.

- 5.10 Subject to arboricultural constraints and livestock considerations, a continuous leisure route adjacent to the Great River Ouse could be delivered on land within the control of the Alington Estate. Opportunities to create circular loops off this riverside leisure route to connect with St Deny's Church could be considered as further assessments are undertaken as part of the promotion of the new settlement option.
- 5.11 In addition to specific fields on the west of Barford Road being excluded from development, with the exception of the scrub/woodland immediately south of RWE and woodland in the location of the proposed southern bridge crossing the ECM, the objective is to seek to retain the existing woodlands on site and through the new settlement option, link these through multifunctional green corridors.

6 Sustainability objective | assessment question | climate change and energy – reduce emissions of carbon dioxide and improve energy efficiency

3a Proposing a renewable energy scheme or extra energy efficiency standards?

- 6.1 Further investigation is required to ascertain if a renewable energy generation scheme or efficiency standards that go beyond normal requirements are achievable. No commitment can be made at this stage in the preparation of the BBLP 2040.

3b Within or adjoining the urban area, a defined settlement policy area or the built form of a small settlement? Assessment as for 1a.

3c Accessibility on foot to a food store? Assessment as for 1b.

3d Accessibility on foot to a primary school? Assessment as for 1c.

3e Accessibility on foot or by bus to a major employer? Assessment as for 1d.

7 Sustainability objective | assessment question | cultural heritage and historic environment – conserve, sustain and enhance the historic environment

4a Likely to impact on designated or non-designated heritage assets or their settings?

- 7.1 Following the call for sites, further assessment has been undertaken and has resulted in the field between St Deny's Church and Lower Farm Barns being excluded from development. This means that both the above and below ground archaeological remains of a medieval village and former location of a 19th century parkland (Boat House Field and The Park) will not be developed. Furthermore, land to



the southwest of Barford Road, which is within the functional flood plain, but which also has visual evidence of ridge and furrow is also not proposed for development.

7.2 At Lower Farm Barns, whilst functional uses need to be found for the buildings and therefore development of the complex would be necessary this will be done in a manner that will not lead to substantial harm under the definition of paragraph 200 of the NPPF. Similarly, the non-designated heritage assets of the gate lodges and former schoolhouse will be incorporated into the development but as buildings that will provide a sense of place.

7.3 The extent of the settings of the listed buildings (Lower Farm Barns, Lower Farmhouse, and 1-4 The Cottages) will be defined ahead of the regulation 19 stage of BBLP 2040 preparation. However, the quantum of development proposed and set out elsewhere in these representations has made an allowance within 'development areas DA3 and DA6' (identified on drawings 60830-PP-500 A (new settlement proposal) and 60830-PP-501 (parish growth)) in anticipation that part of these development parcels will require sensitive development and will possibly require certain areas to remain undeveloped. Any reduction in net developable area as a consequence to the settings of listed buildings is not anticipated to reduce the delivery of new homes proposed to contribute to BBC's housing requirement.

7.4 In other words, the housing numbers put forward are on the conservative side and therefore, even with further refinement of the net developable area, the proposals will achieve circa 200 homes in relation to the parish growth option and circa 4,000 new homes from the new settlement option.

8 **Sustainability objective | assessment question | employment, business, retail and tourism – promote strong, sustained and balanced economic growth, stimulating job creation across a range of sectors**

5a [Likely to increase future economic and employment opportunities?](#)

8.1 The Bedford Borough Employment Land Study Part One (BBELS) identifies a quantitative requirement for additional B class employment land of 171ha to 2040, split roughly 40% offices, 30% industry and 30% warehousing. Accounting for the existing available supply of 48ha of land, the draft BBLP 2040 proposes there is a need to identify 123ha of B class employment land. It further proposes that 60ha of this is required for two new business parks, leaving 63ha to be allocated up to 2040 for further general employment uses, split between office, industry and warehousing.

8.2 The BBELS further explains that in addition to existing available sites in the borough, the need for large-scale warehousing over the plan period in the area is likely to be fully met by extensive allocations for strategic warehousing in Central Bedfordshire. As a result, it states that it is unlikely that more land for warehousing needs to be allocated in the BBLP 2040 and the 63ha requirement for 2040 should be



allocated on smaller sites which are more likely to be attractive for office and general industrial purposes rather than large scale warehousing.

- 8.3 The call for sites representation submitted on behalf of the Executors of the late Nigel Alington, proposed B1: 9,616m² to 20,244m² or B2: 7,191m² to 15,176m² or B8: 6,568m² to 13,861m² or a mix of these uses (mix subject to employment evidence). Whilst 3.25ha of employment land is indicatively shown west of Barford Road for both the parish growth and new settlement options, development areas DA1 and DA2 will increase following the grounding of existing overhead powerlines. This work is currently being undertaken.
- 8.4 The employment area will increase to 3.61ha and help contribute towards the borough's overall employment needs. It would be suitable for the development of both office and industry as identified by the BBELS.
- 8.5 The location of employment land to be provided as part of the proposals, for either the parish growth option or new settlement option, is subject to the impact of planned and potential strategic infrastructure (A428 Black Cat to Caxton Gibbet road improvement and EWR). Were the site to secure allocation this would be considered as part of the masterplanning process.
- 8.6 In 2019, EWR announced a preferred route option for the section of the line between Bedford and Cambridge. Between 31 March and 9 June 2021 public consultation was undertaken to consider five shortlisted potential route alignments for the railway and potential station locations. Alignments 1, 2 and 9 were proposed to cross land within the Alington Estate and, if chosen, will have implications for the new settlement option. Two alternative alignments, routes 6 and 8 would have limited construction impact but would represent significant gains in the choice of sustainable modes of travel due to the proximity of the proposed station locations (68m St Neots South Option B station and 1243m Tempsford Option B station (which is within acceptable walking and cycling distances). All five options would have implications for the location of employment land within the new settlement option for Little Barford.
- 8.7 Separate evidence has been prepared in consideration of the impact the EWR route alignment and station location options might have. It considers land take, the quantum of development and solutions to ensure the community of a new settlement at Little Barford is integrated in relation to the accessibility of community services and facilities for residents in relation to each of the five route options. In summary, the evidence demonstrates that the delivery of a sustainable new settlement for circa 4,000 can still be delivered within the plan period.
- 9 **Sustainability objective | assessment question | employment, business, retail and tourism – promote vital and viable town centres**

6a [Proposing a main town centre use in, on the edge or outside of a town centre?](#)



9.1 Paragraph 86 of the NPPF states inter alia that in drawing up local plans, local planning authorities should define a network and hierarchy of centres. This is important because paragraph 87 emphasises that defined town centres are the preferred locations for new main town centre uses.

9.2 The term ‘town centres’ in the NPPF refers to ‘city centres, town centres, district centres and local centres’ as types of town centre. The BBLP 2040 is proposing to use the following typology of centres:

Town centres for the purposes of the NPPF:

1. Strategic centre
2. District centre
3. Local centre (including key service centre)

Other centres

4. Neighbourhood centre

9.3 An allocation for a new settlement option at Little Barford should make provision for a defined ‘town centre’ area for the purposes of the NPPF. This would likely be in the form of a key service centre as identified in the Town Centres and Shopping Topic Paper (June 2021), serving primarily the local catchment but also the surrounding rural area with a range of small shops and facilities in keeping with those listed in paragraph 2.5 of the Town Centres and Shopping Topic Paper. In making provision within the allocation policy for a new settlement at Little Barford for a defined ‘town centre’ area, BBC will remove the need to apply a sequential test for main town centre uses within the defined area. This would be one element to encourage take up and assist in establishing, in early phases of the development, services and facilities for the community to use and the associated sustainable travel patterns.

10 **Sustainability objective | assessment question | health and wellbeing - encourage and support physical activity**

7a Within 400m of an existing open space or proposing open space within it?

7b Within 800m of a sports facility or proposing a sports facility within it?

10.1 The new settlement option will include community facilities and will be masterplanned to create walkable neighbourhoods. The existing features of the Alington Estate include areas of woodland and other areas that create opportunities for multifunctional recreational open space. Formal playing pitch provision would be included as part of the new settlement option for Little Barford.

11 **Sustainability objective | assessment question | landscape and townscape – protect and enhance landscape and townscape character and the sense of place in settlements**

8a Likely to have a significant adverse impact on the surrounding landscape?



- 11.1 BBC has commissioned LUC to update to the Landscape Character Assessment (LCA) published in May 2014 with the update published in October 2020. The landscape character assessment describes and classifies the recognisable and consistent pattern of elements that makes one landscape different from another. The character is what makes each part of the landscape distinct and gives each area its particular sense of place.
- 11.2 The LCA identifies and describes six landscape types across the borough, each with a relatively homogenous character with similar physical and cultural attributes. The landscape types are subdivided into component landscape character areas of which there are 13. Each of these character areas are defined based on distinct and recognisable local identify. The promotion site at Little Barford is spread across two of these character areas; the Great Ouse Clay Valley and Biggin Wood Clay Vale. It is suggested within the LCA that each of these character areas have key characteristics that distinguish them from other areas of the borough. The Great Ouse Clay Valley covers much of the site west of the ECM whilst the area south of Rectory Close, between Barford Road and the ECM is part of the Biggin Wood Clay Vale.
- 11.3 BBC's evidence on landscape type and landscape character areas is proposed by the Bedford Borough Design Guide scoping consultation document¹, to provide the basis for analysis in preparing design guides/codes for development in the rural parts of the borough. Currently BBC does not propose to have a different basis for preparing design guides for new settlement allocations.
- 11.4 The NPPF provides scope at paragraph 129 where it states, "*Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale*". BBC should provide separate guidance for allocated new settlements to recognise that new settlements provide an opportunity to create a distinct sense of place. Whilst recognising the landscape framework that these strategic sites possess BBC's development plan documents should acknowledge that planned and potential strategic infrastructure will change the existing landscape framework.
- 11.5 We contend that for new settlements of the scale proposed by the BBLP 2040 landscape type and landscape character areas are not the most appropriate reference to "*creating beautiful and distinctive places with a consistent and high quality standard of design*" as required by the NPPF. Paragraph 130 c) of the NPPF states, "*Planning policies and decisions should ensure that developments [inter alia], are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)*". A design guide predicated on landscape type and landscape character areas does not deliver the balanced approach set out in paragraph 130 of the NPPF.
- 11.6 Further information on landscape will be submitted prior to the regulation 19 consultation.

¹ Consultation ends 3 September 2021



8b Within the existing settlement form?

11.7 Refer to paragraphs 4.1 to 4.4 (inclusive) above.

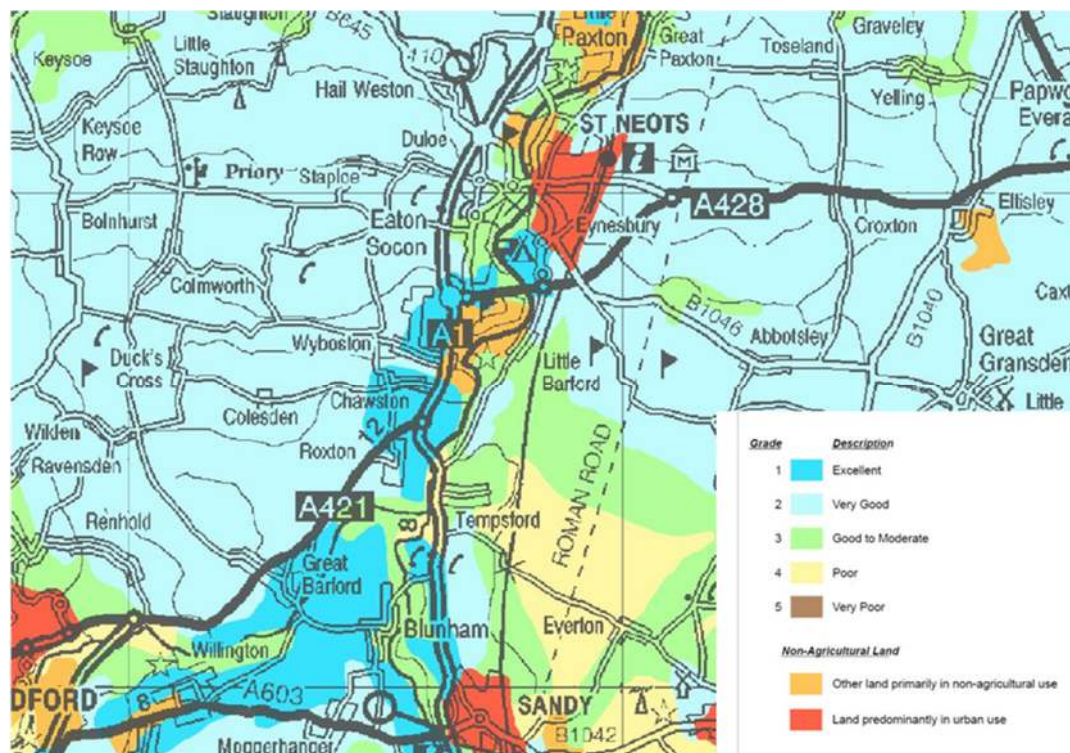
12 Sustainability objective | assessment question | land, soil and water – maximise development on previously developed land and avoid the loss of high quality agricultural land

9a On previously developed land?

12.1 The number of new homes required to meet BBC's local housing need is such that greenfield land will need to be allocated.

9b On best and most versatile agricultural land ie grades, 1, 2 or 3a?

12.2 Please refer to extract from the Agricultural Land Classification Map Eastern Region (Natural England) below.



Natural England 24 August 2010

12.3 The above map demonstrates that land to the west of Barford Road is primarily classified as grade 3, good to moderate agricultural land or identified as other land primarily in non-agricultural use. East of Barford Road the predominant land classification continues to be grade 3, whilst there are small areas of higher quality grade 2 land located in the northern and southern areas of the parish growth and new settlement options. This trend continues east of the ECM where land is predominantly of grade 3 quality with an area in the north and east classified as grade 2.



12.4 The map only provides details of land grades 1-5 and does not include the subdivision of grade 3 land into 3a - good quality agricultural land and 3b – moderate quality agricultural land. Further work is required to confirm whether the land within the site is grade 3a or 3b agricultural land. However, it is worth noting that the alternative new settlement option under the growth and spatial strategy options 2b, 2c and 2dat Wyboston is predominantly agricultural land classification 2.

13 **Sustainability objective | assessment question | land, soil and water – protect the quantity and quality of water resources**

10a *Within a groundwater source protection zone?*

13.1 Land within the control of the Alington Estate is not within a groundwater source protection zone, therefore the parish growth and new settlement options for Little Barford are not impacted by this selection criterion.

14 **Sustainability objective | assessment question | land, soil and water – minimise flood risk**

11a *At risk of flooding?*

14.1 Since the call for sites submission work has been carried out to establish the flood risk associated with development of the site. Richard Jackson Ltd has been commissioned to undertake a Site-Specific Flood Risk Assessment (FRA), June 2021 (revision A).

14.2 The FRA confirms that the existing use, agriculture and associated housing, and the proposed use, residential and employment, results in no change to the flood risk classification, both falling under the classification of “most vulnerable”. Paragraph 11.1 of the FRA confirms that “*development will be situated in Flood Zone 1 and is an appropriate for development for that zone according to the Planning Policy Guidance of the NPPF and the LLFA*” and that “*There will be no increase in water flow from the site once a suitable mitigation strategy is in place and development will be located outside of the surface water flooding areas*”.

14.3 Additionally, a surface water strategy has confirmed that there will be no increase in water flow from the site as the drainage strategy has been devised to accommodate the 1 in 100-year event plus 40% climate change within the surface water drainage system concluding “*Once the suitable mitigation strategy is in place and development located outside of the surface water flood areas, there is a satisfactory drainage strategy for the site*” (paragraph 11.2, p.16, Surface Water Strategy, August 2021, Richard Jackson Ltd).

14.4 The surface water strategy is based on a worst-case scenario that there will be 100% runoff from proposed impervious surfaces. To refine the strategy future works are planned to include ground conditions/infiltration studies.



14.5 The proposed drainage strategy includes the provision of a number of drainage attenuation basins for development areas across the site. The proposed quantum of development set out elsewhere in these representations accounts for this provision and ensures that any reduction in the net developable area as a consequence of water attenuation provision does not undermine the delivery of the dwelling numbers required by BBC from a new settlement. As stated above, this strategy is based on a worst-case scenario and with future work and refinement, the area required for attenuation basins may be reduced.

15 **Sustainability objective | assessment question | population, housing and community – promote good quality housing, ensuring an appropriate mix of house types and sizes**

12a Likely to provide a mix of housing, including affordable housing?

12b Able to address a particular housing need?

15.1 Both proposals for Little Barford (parish growth and new settlement options) are of a scale that would provide a mix of housing. The existing BBLP 2030 and the regulation 18 version of the BBLP 2040 contain and propose policies that would ensure developments of certain scales cater for a range of housing needs including affordable housing.

16 **Sustainability objective | assessment question | population, housing and community – provide for residents' need and improve access to community services and facilities**

13a Within 800m of a facility where cultural or social activities can be accessed?

16.1 The proposals for parish growth and new settlement options at Little Barford are focused on land to the east and west of Barford Road and seek to provide development around the historic core of Little Barford. There are several vacant or underutilised buildings. Further assessment is required to establish if any of these could be viably converted for cultural or social activities.

16.2 The proposal for a new settlement option includes the provision of services and facilities to meet the needs of the new community. Details of the exact services and facilities to be provided require additional work in establishing the needs and viability of provision. The sustainable transport strategy proposes to include internal cycleways adjacent to principal routes within the site to provide sustainable access to facilities.

16.3 The provision of a supermarket and educational facilities has been included in the net developable area calculations and their provision will not undermine the number of dwellings delivered on site. The policy wording for a new settlement allocation in relation to the onsite provision of schools should include that the school facilities (hall, playing fields etc) be shared with the community.



17 Sustainability objective | assessment question | population, housing and community – promote social cohesion, the prevention of crime and reduce the fear of crime

14a Likely to encourage social cohesion?

14b Likely to help make the area safer?

17.1 Both proposals for Little Barford (parish growth and new settlement options) are of a scale that would enable the proposals to be designed to achieve social cohesion and prevent and reduce the fear of crime.

17.2 Where green corridors are proposed to have a multifunctional use eg habitat corridors and safe walking and cycling routes to schools these will be designed on safe neighbourhood principles.

18 Sustainability objective | assessment question | transport – reduce the need to travel and promote sustainable modes of transport

15a Within or adjoining the urban area, a defined settlement policy area or the built form of a small settlement? Assessment as for 1a.

15b Accessible on foot to a food store? Assessment as for 1b.

15c Accessible on foot to a primary school? Assessment as for 1c.

15d Accessible on foot or by bus to a major employer? Assessment as for 1d.

15e Able to connect with the highway without constraint?

15f Able to be developed without causing highway or junction capacity issues?

18.1 The proposal for a parish growth option of circa 200 new homes and employment development on land east and west of Barford Road would rely on St Neots for access to higher order facilities. Access to these facilities will be provided by proposed offsite improvements to pedestrian and cycle routes along the Barford Road. The submitted sustainable transport technical note provides details for the provision of shared use cycleways from the northern access of the site into St Neots. These proposals also include the provision of road crossing facilities across the existing A428 and the B1043.

18.2 The proposals provide future residents with safe and convenient foot and cycle access to the Tesco superstore located in St Neots. Additionally, the proposed B1043 crossing location has been identified as part of a 'desire line' for pedestrians from the housing developments to the east. The proposal set out provides betterment for these users through the provision of a safe crossing point across the B1043.

18.3 Further assessments are required to ascertain which services and community facilities are provided in the early development phases of the new settlement proposal. However, residents of the new settlement (and the parish growth option) who might access the higher order facilities in St Neots will be provided with a choice of sustainable travel options. The sustainable transport technical note sets out proposals for providing access to these facilities. As the new settlement development progresses, onsite services and facilities will increase in provision.



- 18.4 On-site cycleways will be developed as the development phasing progresses and masterplans for each parcel are designed providing alternative access to facilities.
- 18.5 The new settlement proposal has considered the need to provide facilities and services commensurate with a key service centre including the provision of a new supermarket and educational institutions within the development and has accounted for these in the net developable land area calculations. This ensures that the provision of the necessary services and facilities does not undermine the delivery of dwelling numbers required by Bedford Borough for a new settlement.
- 18.6 Currently the public transport for Little Barford is of a poor standard where only a single service runs between Biggleswade and St Neots on a Thursday. The proposed public transport scheme would greatly enhance accessibility to public transport and all development would ideally be within 400m of the main public transport corridors. Bus services would run at an improved frequency to meet demand and local policy. Until the location of the EWR station is known it is anticipated that the destination for the bus will be St Neots town centre, whilst passing the Tesco store, leisure centre and Ernulf Academy for secondary education.
- 18.7 Land east of the ECM railway within the new settlement proposal at the Alington Estate would be approximately 1,200m from the proposed bus route. To ensure public transport remains an attractive option the bus route could be diverted into the development parcel and then return to Barford Road on an occasional basis. Additional consideration will be given to the inclusion within the site of a public transport hub to assist residents walking or cycling from east of the ECM with access to the bus service.
- 19 **Further Topics – East West Rail and sustainable transport**
- 19.1 Additional to the sustainable transport facilities discussed earlier in these representations it is also important to consider how future infrastructure projects within the area may influence the site. EWR is a rail infrastructure project that proposes to link Oxford to Cambridge and more locally, Bedford to Cambridge. EWR has most recently (31 March - 9 June 2021) consulted on route alignment options for the Bedford to Cambridge section of the line. This will provide a route between Sandy and St Neots with four of the route options including in the consultation crossing land within the Alington Estate put forward in this submission for a new settlement.
- 19.2 The EWR proposals also include the provision of a new station to be located either within the Alington Estate (St Neots South Option A station) and or on land to the near south (St Neots South Option B station, Tempsford Option A station and Tempsford Option B station). This will provide further sustainable transport options for future residents commuting to Cambridge or Bedford. Cycle links to the proposed stations will also be important. Provision of these can be considered in greater detail when the EWR route and station alignments are confirmed but should the development go ahead it is



proposed a route cycleway running parallel to the eastern side of ECM would provide access to a future station.

- 19.3 Separate evidence has been prepared in consideration of the impact the EWR route alignment and station location options might have. It considers land take, the quantum of development and solutions to ensure the community of a new settlement at Little Barford is integrated in relation to the accessibility of community services and facilities for residents in relation to each of the five route options. In summary, the evidence demonstrates that the delivery of a sustainable new settlement for circa 4,000 can still be delivered within the plan period.

20 Minerals Safeguard Area

- 20.1 The southern portion of the site is designated as a minerals safeguard area as shown on the Minerals and Waste Local Plan Strategic Sites and Policies LDD: Policies Map Location Plan (January 2014). The area of the site affected by the minerals safeguard area includes several important elements that would preclude or severely limit areas where minerals could be extracted. An area to the south west of the site adjacent to the River Great Ouse is not proposed for development due to its function as flood plain and the presence of ridge and furrow archaeological features. The presence of a Medieval village, 19th century park, listed buildings and other non-heritage assets and CWS preclude mineral extraction from areas west of Barford Road with the exception of the two fields to the south west fronting on to the Barford Road. However, these fields and fields on the east of the Barford road are constrained by the presence of high pressure gas mains and high voltage overhead power cables and pylons and woodland.
- 20.2 It is also noted that the support text for Policy 47S – Pollution, disturbance and contaminated land of the BBLP 2030 states; *“Development proposals which are located close to permitted or allocated mineral and waste sites may require a tract of land within which no development should take place to ensure that no new incompatible development encroaches upon existing permitted and allocated mineral and waste management sites. Buffer zones may be landscaped to alleviate noise and improve visual appearance. The size of the buffer zone required will be determined by the type of operation and particular site circumstances. However, buffer zones would normally be expected to be set at around 200 metres for mineral working and inert waste disposal”*
- 20.3 Once the above areas have been excluded from the areas identified within the minerals safeguarding area it is questionable whether the remaining areas would be of sizes viable for mineral extraction. Furthermore, it is currently unknown what the quality of the mineral resource is in those areas that could theoretically be extracted. Further assessment would establish whether the preferred development could proceed with minerals left in situ or if there is a need to incorporate some mineral extraction into the development.



21 **Conclusions**

- 21.1 These representations and the technical documents that accompany them demonstrate that both the transport corridor – east: parish growth and new settlement elements of the growth and spatial strategy options 2b, 2c and 2d are deliverable in respect of the proposals at the Alington Estate, Little Barford.
- 21.2 Apply the criteria of the BBLP 2040 Site Selection Methodology, June 2021 to assess the two growth options proposals at Little Barford based on the latest evidence and refinements to the proposals demonstrates that in accordance with paragraph 35 of the NPPF the inclusion within the BBLP 2040 of either the parish growth option or new settlement option at Little Barford would satisfy the tests of soundness.