



Local Plan consultation on additional evidence

Representations on behalf of Terra Strategic

Proposed new settlement
Beadlow Manor, Ampthill Road, Shefford

DLA Ref: 15/287
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1.0 INTRODUCTION AND SUMMARY

Introduction

- 1.1 These representations are made on behalf of Terra Strategic, a promotion company with an agreement to promote land at Beadlow Manor on behalf of the landowner, the Firoka Group. They supplement representations made by the Firoka Group at Regulation 19 stage in 2017 and examination hearing statements submitted in 2019.

Summary

- 1.2 The proposal for a new settlement at Beadlow Manor was not included in the submitted draft Local Plan. Representations made to the pre-submission draft in 2017 and statements submitted to the examination in 2019 explained that the exclusion of the Beadlow proposal was not soundly based. In particular, the proposal's exclusion from the list of reasonable alternatives is not sound.
- 1.3 The Council has now published additional material in response to concerns expressed by the Inspectors about the soundness of the Local Plan. The representations set out in this report respond to the additional material published and update matters, particularly in respect of education provision.
- 1.4 Despite the additional Sustainability Appraisal material published, the Beadlow proposal is still not included as a reasonable alternative – a decision that is not founded on robust evidence. In the absence of an assessment by the Council, DLA Town Planning has conducted its own assessment using the Council's criteria and adopting the same approach to the Council's assessments. The results, shown in Appendix A, demonstrate that the Beadlow new settlement performs equally as well as the Council's proposed allocations, and better in key respects. The use of previously developed land, the absence of a loss of agricultural land and the potential for substantial contributions to infrastructure projects that are both needed and unfunded are particularly noteworthy. If the findings were ranked using a scoring system, Beadlow Manor would rank in the top 3 of all the options assessed by the Council.
- 1.5 On transport, the Council-defined "hot spot" at the A6/A507 junction has a mitigation measure provided and costed by the Council but has no means of delivery. It is not tied directly to any of the Local Plan allocations and, although growth is proposed in the area around the junction, none are large enough to secure adequate developer contributions to deliver the mitigation scheme. Beadlow is of a sufficient size to deliver meaningful contributions and should have received more of a focus through the site assessment process.
- 1.6 In terms of education, the "imminent" shortfall of school places in the Shefford area identified by the Council's Infrastructure Delivery Plan remains unaddressed. The Council's

recent proposals to shift to a two-tier system for the Shefford and Stotfold area would change overall provision but are undeliverable without securing substantial external funding. In addition, the decision to relocate the school in Campton to a new site some 3.3km away will make school travel more difficult for a large number of pupils. Delivering a new school at the Beadlow site would resolve this issue, retain education with walking distance of Campton and the Chicksands MoD base while transferring the cost and risk of school provision to a private developer. These are important issues that have not been considered as part of the Council's site assessment process.

- 1.7 The new settlement proposed at Beadlow would consist of around 1,600 dwellings, together with a neighbourhood centre, new three-form entry primary school, retained 18-hole golf course and new clubhouse facilities. There are two specific elements that set this proposal apart from other new settlement proposals. Firstly, the link with the retained golf course means that restaurant, bar and gym facilities are viable that would not be viable with just 1,600 dwellings. Normally a far higher critical mass would be needed. This feature provides a valuable resource for residents and an important community focal point, while also helping to underpin the viability of the golf course. The second element that sets the Beadlow proposal apart is the proximity of a major employment location within walking distance of the site. Typically, a freestanding settlement of 1,600 homes would not be able to offer much in the way of on-site employment, beyond service/retail jobs. However, in the case of Beadlow, Central Bedfordshire Council's head office is less than 1,000 metres from the site and offers a large number and wide range of jobs. These important features have not been factored into the Council's assessment of the Beadlow proposals.

2.0 SUSTAINABILITY APPRAISAL

2.1 The Inspectors' concerns with the Sustainability Appraisal (SA) that accompanies the submitted Local Plan were set out in their letter dated 30 September 2019 and fell broadly into two categories – the assessment of reasonable alternatives and the SA findings on specific sites. A theme that emerged from the hearing sessions held during 2019 was the lack of coordination between the Council's technical reports and the site assessment work and the Inspectors' letter addresses this point in a number of specific respects.

2.2 In response to the Inspectors' concerns, the Council has commissioned additional SA work from consultants, LUC. This work revisited elements of the original SA work undertaken by Enfusion.

Areas for development growth

2.3 A key element of our representations on the draft Plan is the unsoundness of the Council's approach to the central part of the district. While growth is directed to the south area, the east-west area and the A1 corridor, the central part (known as Area D) received little growth. The reasons for this decision relate back to a stated lack of infrastructure and the way in which past incremental growth has not allowed infrastructure investment to take place. However, the Council's response to this situation is to allocate further piecemeal development that cannot satisfactorily address the infrastructure concerns. In our view, allocating a new settlement at Beadlow would be consistent with a wider strategy of protecting the existing towns and villages in the central area from further piecemeal development while still delivering infrastructure investment through development.

2.4 The SA of this element of Local Plan production has not been revisited since the original Regulation 19 report in October 2016. This SA report highlighted some of the sustainability implications of the Council's strategy but did not consider any alternative strategies for area D, nor did it look critically at the Council's assessment of the growth potential of area D.

Approaches to distributing development growth

2.5 Among the options for distributing growth, the size of village-scale new settlements has been amended in the updated SA work. The change in threshold for assessment from 2,000 homes to 1,500 homes is welcome and better reflects the size of possible new villages.

2.6 The updated assessment work is necessarily high level because it isn't site-specific. This limits the value of this part of the SA and places additional emphasis on the assessment of specific new village proposals, see below.

Growth locations for development growth – housing

- 2.7 We pointed out in previous submissions, including our Matter 6 statement from May 2019, that the Beadlow site had not been assessed in the SA because of the findings of the Growth Options Study, findings that were not soundly based. The Growth Options Study considered a purely abstract proposal relating to random pieces of land between Clophill and Beadlow. The proposal was not put forward as a Call for Sites submission and had no evidential basis nor any real justification. Unsurprisingly the proposal was not taken forward. Had the Growth Options Study looked at the specific proposal put forward for the Beadlow site and the evidence base that lay behind it, it would have fared better and should have been listed as a reasonable alternative for the SA to then assess.
- 2.8 In the absence of an assessment of the Beadlow proposals in the SA, we have undertaken the assessment ourselves, using the Council’s SA framework. The conclusions have been reached using the SA conclusions on other similar sites as a guide. The results are included at Appendix A. For comparison purposes, a summary is included in Table 1 below, alongside the Council’s assessment of other reasonable alternatives.
- 2.9 It is apparent from Table 1 that the Beadlow proposal fares at least as well as the Council’s assessed options and, in some respects, scores better than other options.
- 2a (Green Belt) – no loss of Green Belt involved.
 - 2b (Settlement identities) – the creation of a new settlement at Beadlow reflects the prevailing settlement pattern and, critically, avoids additional piecemeal growth around existing settlements.
 - 6 (Highways) – while the Beadlow proposal will generate additional traffic through junctions that are already busy, it will also generate substantial developer funding to enable junction improvements schemes that are not viable with a more dispersed pattern of development as proposed in the submitted Local Plan.
 - 11 (agricultural land classification) – Beadlow is the only assessed option not to involve the loss of agricultural land, being redevelopment of a golf course.
 - 11 (previously developed land) – Beadlow is one of only four options that involves redevelopment of previously developed land.
 - 13 (landscape) – the submitted Landscape and Visual Appraisal identifies the highly contained nature of the Beadlow site and the existence of substantial existing landscape planting.
- 2.10 The SA does not include any form of scoring system for the findings under each category but for the sake of comparison, we have tested the findings using a variety of scores and weightings. A variety of systems were deployed awarding points for positive findings and deducting points for negative findings. The results of two such scoring systems are shown in Tables 2 and 3 below, which show Beadlow as the best of the assess options. However, under

almost any scoring system, the number of positive scores and the lack of negative scores results in the Beadlow site option ranking in the top three of all the options assessed by the Council. This emphasises the validity of the Beadlow new settlement and highlights the Council's error in not assessing it as a reasonable option.

- 2.11 It is clear from Table 1 below that the Beadlow new settlement should have been considered for allocation yet has not even been assessed as a reasonable alternative.
- 2.12 On the basis that the SA has not assessed a clear reasonable alternative, the submitted Local Plan is not legally compliant. Not taking the Beadlow proposal into account also renders the plan unsound as it is not "justified".

Table 1: Council's SA of key sites with DLA Town Planning's assessment of Beadlow Manor

Site Options	1. Housing		2. Communications		3. Services & Facilities	4. Employment		5. Health and Equality		6. Highways and Air Quality	7. Sustainable Transport	8. Energy and Climate Change	9. Water Resources and Quality	10. Flood Risk	11. Soil		12. Biodiversity & Geodiversity	13. Landscape	14. Historic Environment
	Green Belt	Settlement Identities	Employment Support	Town Centres	Regeneration	GI	ALC	PDL	10. Flood Risk	9. Water Resources and Quality	8. Energy and Climate Change	7. Sustainable Transport	6. Highways and Air Quality	5. Health and Equality	4. Employment	3. Services & Facilities	2. Communications	1. Housing	
Arlesey Option 1 (Up to 2,000 Homes)	0	-	0	+	0	++	0	++	0?	0?	+	++	0?	0	--?	0	++/?	+/-	-?
Arlesey Option 2 (Up to 2,000 Homes)	0	-	0	+	0	++	0	++	0?	0?	+	++	0?	0	--?	0	+/?	+/-	-?
Arlesey Option 3 (Up to 1,800 Homes)	0	-	0	+	0	++	0	++	0?	0?	+	++	0?	0	--?	0	+/?	+/-	-?
Apsley Guise (Up to 3,000 Homes)	0	-?	0	+	0	++	0	++	0?	0?	++	++	0?	0	--?	0	-?	++	-?
Biggleswade East Phase 1 (Up to 1,500 Homes)	0?	+	0	+	0	++	0	++	0?	0?	+	++	0?	-?	--?	0	-?	++	0?
Biggleswade East Phase 2 (Up to 5,500 Homes)	0?	-	+	+	0	++	+	++	0?	0?	+	++	0?	-?	--?	0	-?	++	--?
Henlow Airfield and Camp (1,000 Homes)	0	+	+	+	0	+++	+	++	--?	0?	+	++	0?	0	--?	+	+/?	++	--?
Houghton Regis North (Between 4,150 & 5,150 Homes)	--	-?	+	+	+++	++	+	++	--?	0?	+	++	0?	0	--?	0	+/?	++	-?
Luton North Option 1 (Up to 4,000 Homes)	--	-	++	+	+	++	++	++	-?	0?	+	++	0?	0	--?	0	+/?	--?	-?
Luton North Option 2 (Up to 3,100 Homes)	--	-	+	+	+	++	+	++	-?	0?	+	++	0?	0	--?	0	+/?	-?	-?
Luton North Option 3 (Up to 3,600 Homes)	--	-	+	+	+	++	+	++	-?	0?	+	++	0?	0	--?	0	+/?	-?	-?
Luton West Option 1 (Up to 2,000 Homes)	--	-	+	+	+++	++	+	++	--?	0?	+	++	0?	0	--?	0	+/?	-?	0?
Luton West Option 2 (Up to 3,500 Homes)	--	-	+	+	+++	++	+	++	--?	0?	+	++	0?	0	--?	0	+/?	--?	0?
Luton West Option 3 (Upwards of 4,600 Homes)	--	-	+	+	+++	++	+	++	--?	0?	+	++	0?	0	--?	0	+/-?	--?	-?
Marston Moretaine North (Marston Thrift) (Up to 1,500 Homes)	0	--?	0	+	0	+++	0	++	-?	0?	+	++	0?	0	--?	0	+/?	++	-?
Marston Moretaine South (Marston Vale) (Up to 5,000 Homes)	0	--?	++	+	0	++	++	++	-?	0?	++	++	0?	0	--?	+	+/?	++	-?
North and North East Sandy (4,750 Homes)	0	-?	+	+	+++	++	+	++	--?	0?	+	++	0?	0	--?	0	+/?	-?	-?
Tempsford South and Tempsford Airfield (Up to 10,000 Homes)	0	--	+	+	++	++	+	++	-?	0?	+	++	0?	0	--?	+	+/?	-?	--?
Wixams South (Up to 650 Homes)	0	-	0	+	++	++	0	++	0?	0?	+	++	0?	0	--?	0?	+/?	++	-?
Beadlow Manor (Up to 1,600 Homes)	0	+	0	+	++	++	0	++	0?	0?	+	++	0?	0	-	+	+/?	++	-?

Table 2 – SA scoring – ranking option 1

SA finding	Score	SA finding	Score	SA finding	Score
Dark Green	10	Light green	5	Blue	0
Yellow	-5	Orange	-10	White	0
Site Option					Score
Beadlow Manor (Up to 1,600 Homes)					50
Marston Moretaine South (Marston Vale) (Up to 5,000 Homes)					40
Biggleswade East Phase 1 (Up to 1,500 Homes)					35
Henlow Airfield and Camp (1,000 Homes)					35
Apsley Guise (Up to 3,000 Homes)					30
Wixams South (Up to 650 Homes)					30
Houghton Regis North (Between 4,150 & 5,150 Homes)					25
Arlesey Option 2 (Up to 2,000 Homes)					25
Arlesey Option 3 (Up to 1,800 Homes)					25
Arlesey Option 1 (Up to 2,000 Homes)					25
Biggleswade East Phase 2 (Up to 5,500 Homes)					20
Tempsford South and Tempsford Airfield (Up to 10,000 Homes)					20
North and North East Sandy (4,750 Homes)					20
Marston Moretaine North (Marston Thrift) (Up to 1,500 Homes)					20
Luton North Option 1 (Up to 4,000 Homes)					15
Luton West Option 1 (Up to 2,000 Homes)					15
Luton North Option 2 (Up to 3,100 Homes)					15
Luton North Option 3 (Up to 3,600 Homes)					15
Luton West Option 2 (Up to 3,500 Homes)					10
Luton West Option 3 (Upwards of 4,600 Homes)					5

Table 3 – SA scoring – ranking option 2

SA finding	Score	SA finding	Score	SA finding	Score
Dark Green	3	Light green	2	Blue	1
Yellow	0	Orange	-1	White	0
Site Option					Score
Beadlow Manor (Up to 1,600 Homes)					27
Marston Moretaine South (Marston Vale) (Up to 5,000 Homes)					25
Biggleswade East Phase 1 (Up to 1,500 Homes)					25
Henlow Airfield and Camp (1,000 Homes)					24
Apsley Guise (Up to 3,000 Homes)					24
Wixams South (Up to 650 Homes)					23
Houghton Regis North (Between 4,150 & 5,150 Homes)					22
Biggleswade East Phase 2 (Up to 5,500 Homes)					22
Tempsford South and Tempsford Airfield (Up to 10,000 Homes)					21
North and North East Sandy (4,750 Homes)					21
Arlesey Option 2 (Up to 2,000 Homes)					21
Arlesey Option 3 (Up to 1,800 Homes)					21
Marston Moretaine North (Marston Thrift) (Up to 1,500 Homes)					21
Arlesey Option 1 (Up to 2,000 Homes)					21
Luton North Option 1 (Up to 4,000 Homes)					20
Luton West Option 1 (Up to 2,000 Homes)					20
Luton North Option 2 (Up to 3,100 Homes)					20
Luton North Option 3 (Up to 3,600 Homes)					20
Luton West Option 2 (Up to 3,500 Homes)					19
Luton West Option 3 (Upwards of 4,600 Homes)					18

3.0 TRANSPORT

- 3.1 Local Plans must be sound and this includes being “Positively prepared”. Paragraph 182 of the NPPF requires that *“the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development”*.
- 3.2 In our Regulation 19 representations, we described how the plan was not sound because it did not deliver a solution to the transport infrastructure problems at the A6/A507 junction at Clophill. The Council’s transport modelling evidence had highlighted this junction as being a “hot spot” in the district (Document C28). For local residents, the regular queues at this junction are a significant problem, one that has persisted for some time and for which no solution appears likely in the short-term. A previous funding bid made by the Council to signalise this junction was unsuccessful. A potential solution in the form of signalisation is included within the Council’s transport modelling evidence. Given the likelihood of other forms of funding, this issue is one which the Local Plan should have grappled with directly and put forward a growth-based strategy that delivered a solution.
- 3.3 The updated evidence provided by the Council addresses the Strategic Road Network but does not provide any further clarity on how the required mitigation measures that aren’t related to the proposed allocations might be delivered. The A6/A507 junction was one of only a handful of mitigation schemes that was not specifically linked to any growth proposals and, as such, has no likelihood of developer funding to deliver.
- 3.4 The Beadlow Park proposal is of sufficient size to generate significant developer funding to facilitate such an improvement to this junction. Rather than allocate the Beadlow Park scheme, the Local Plan has proposed instead to allocate a series of much smaller allocations that, while still generating additional traffic movements across this junction, do not offer the same scale of developer funding to facilitate a solution. Pooling sufficient developer contributions from smaller sites through section 106 agreements would be very difficult to achieve. This junction is in need of improvement as things stand, leaving aside the committed growth already in the pipeline. The Council’s proposed allocations will further exacerbate the need for action. The Beadlow Park scheme seems the only realistic source of funding to deliver the mitigation that is needed.
- 3.5 An updated assessment of the Beadlow new settlement on key junctions along the A507 has been commissioned from Motion Transport Planning (report attached to these representations). This demonstrates that the impact of the Beadlow proposal on these

junctions can be mitigated through a combination of delivery of the Council's own mitigation schemes and an additional scheme for the A507/A600 junction.

- 3.6 The scale of financial contribution to mitigation measures and the relative importance of each will need to be determined in discussions with the local highway authority. However, it is clear a substantial contribution will be required towards the A6/A507 junction as well as towards the A507/A600 junction improvement and a total highway contribution of up to £5 million could be feasible depending on the size of the new settlement.
- 3.7 The Council's transport evidence base also highlights the role for a new public transport link connecting towns and employments sites along the A507 on the eastern side of Central Bedfordshire. The report highlights the scale of the new mixed-use site at RAF Henlow as an opportunity to provide sustainable travel to and from this site as part of the wider link. The potential route of this link is shown in document C28 and runs from the Council Offices at Chicksands across to Arlesey railway station and on to Stotfold. The Beadlow Park site is only around 1,000 metres further along the A507 from the Council Offices and could form an "anchor point" at one end of the route. The scheme could provide potential passenger usage to underpin the long-term financial viability of the scheme and potential developer contributions to pump-prime the scheme in its early phases. The Council recognises the role for RAF Henlow in supporting this route and there is no reason why Beadlow Park could not play a similar or greater role. Indeed, the potential for a high-quality public transport link along the A507, linking the stations at Arlesey, Flitwick and Ridgemont was initially suggested in our Call for Sites submission back in 2016, see appendix, Figure 7.
- 3.8 The Motion transport work submitted with these representations takes this on a stage further. Discussions have been had with the operator of the existing 200 bus service to ascertain a likely cost of either upgrading existing routes or providing a new route. Both of these options are feasible and likely initial funding has been identified and the estimated costs of £170,000 per year for five years is viable for a development of this scale.
- 3.9 The Local Plan should be positively prepared and should deliver the infrastructure requirements needed locally. As such, the Beadlow Park scheme should be included as it would deliver significant developer contributions towards the much-needed upgrade of the A6/A507 junction.

4.0 EDUCATION

- 4.1 As stated above, to be found sound the Local Plan must be *“based on a strategy which seeks to meet objectively assessed development and infrastructure requirements”* (paragraph 182, NPPF 2012). Among the infrastructure needs in Central Bedfordshire is school places in the Shefford area and this is an issue that should have been addressed in the emerging Local Plan.
- 4.2 At the time of making pre-submission representations, there was an urgent need for lower school places, a need which the Beadlow proposal could have helped address. However, the Council has recently consulted on proposals to change to a two-tier system of education for the Shefford and Stotfold areas. As part of the plans, the existing school in Campton village is proposed to relocate to a new site off Hitchin Road, some 3.3km away. These changes represent a significant shift in social infrastructure and ought to have been addressed in the additional material submitted by the Council, including an updated version of the Council’s Infrastructure Delivery Plan.
- 4.3 The Council’s current (2018) Infrastructure Delivery Plan identifies a funding gap of £6.1m, after deducting the expected contributions from the two allocated sites (HAS10 and HAS44). In terms of timing, this infrastructure shortfall is described as *“Imminently-no development should progress in this area before a new primary/lower school site is identified”*. While a site has been identified, the funding gap remains with no immediate prospect of resolution. The shift to two-tier education changes the arrangements but does not resolve the funding gap issue.
- 4.4 While the detail of how new school buildings will be financed is outside the scope of the examination process, the need for local plans to address infrastructure issues and the need for the submitted Local Plan to be revisited in light of the shift to two-tier education remain to be considered at this stage.

5.0 BEADLOW PROPOSALS

5.1 While this stage of the Examination process does not consider site-specific detail, nor omission site proposals, a summary of the Beadlow Park proposal is included here so as to provide context for the earlier discussion and illustrate that additional sites are available to supplement the Council's proposed sites.

5.2 The representations submitted on behalf of the Firoka Group at previous plan-making stages included substantial technical work detailing the deliverability of the proposal. The Call for Sites submission made in April 2016 contained the following documents:

- Planning Report – DLA Town Planning
- Heritage Assessment – Albion Archaeology
- Preliminary Ecological Appraisal – BSG Ecology
- Preliminary Transport Appraisal – Motion Transport Planning
- Initial Landscape and Visual Appraisal – Aspect Landscape Planning

5.3 The Planning Report was resubmitted as part of the pre-submission representations so should be in the Inspectors' possession. The indicative masterplan for the site is attached as Appendix B to this statement.

5.4 In summary, Beadlow Manor Golf Course currently contains two 18-hole courses but is not a viable operation. The Beadlow Park proposals involve a new freestanding settlement of around 1,600 homes, together with a new primary school and neighbourhood centre. The existing landscaping features will be used to create a mature landscaped setting to the new community. A new 18-hole championship golf course would be created around the new development and a new clubhouse built providing facilities to golfers and the new community alike.

5.5 A key feature of the development is that it would generate substantial funding to be invested in local infrastructure, specifically the A6/A507 junction at Clophill and a new school for the Shefford area. The incremental development of small-scale housing sites in this part of Central Bedfordshire, which is proposed to continue under the draft Local Plan, generates additional pressure on infrastructure but without the means to facilitate a solution. The Beadlow Park scheme therefore represents an alternative approach to accommodating development that is likely to be more palatable to local communities than continuing incremental growth.

5.6 These representations are made on behalf of Terra Strategic, a promotion company with an agreement to promote the land on behalf of the landowner, the Firoka Group.

Sustainability Appraisal of Beadlow Manor new settlement proposal (August 2020)

This assessment has been carried out by DLA Town Planning using the Council's Sustainability Appraisal framework and the Council's judgements on other similar sites as a reference point.

Site Option: Beadlow Manor Golf Course Number of Dwellings: Up to 1,600 homes	
Assessment of Effects	
SA Objective	Nature of the likely sustainability effect (including positive/negative, short-medium term (5-10 years)/long term (10-20 years), permanent/temporary, secondary, cumulative, and synergistic); Uncertainty
1. Housing To ensure that the housing needs of all residents and communities are met.	The delivery of up to 1,600 new homes can make a key contribution towards achieving the overall housing needs of Central Bedfordshire with the potential for considerable long-term positive effects. The development site does have the ability to meet the policy objectives of Local Plan policy on housing mix to provide an appropriate mix of housing types, tenures, and sizes.
2. Communities¹ To maintain and enhance community and settlement identities.	Development at this site will not result in the loss of any Green Belt land with neutral effects on the first part of this objective. Housing growth at this site location will result in a new village being created which has the potential to become part of the village network which is prevalent in the area. Creating a new "node" in this village network will help to increase linkages between them and provide complementary services and facilities, whilst still retaining their own unique village character. The masterplan for the proposed development suggests that pockets of green open space will be retained throughout the housing development. Such spaces will help to retain the existing open character towards this settlement. The retained golf course to the rear of the development is a significant positive in creating an identity for the new settlement.
3. Services and Facilities	Technical work undertaken by Motion Transport Planning demonstrates that a new settlement at Beadlow is at least equivalent to, if not better than, sites that are proposed for allocation in the draft Local Plan in terms of accessibility. This report is attached to these submissions.

¹ Please note that first symbol relates to location in/out of Green Belt designation; second symbol relates to effects on integration & identity for existing settlements

<p>To improve accessibility to services and facilities²</p>	<p>In summary, the Motion work compares real-world sustainability rather than theoretical sustainability in transport terms. Being on the edge of a larger settlement doesn't necessarily mean a sustainable site, particularly if the facilities in the centre of that settlement are beyond walking distance. As an example, the Council's assessment of the proposed site for 1,500 homes east of Biggleswade states "<i>Development at the site would be in close proximity to services and facilities available within Biggleswade</i>". However, when measured, the edge of the allocated site is around 2,250m from Biggleswade High Street. The application of this theory means that a new settlement at Beadlow with purpose-built facilities within walking distance could be a more sustainable option than a development on the edge of a larger settlement where facilities are not within walking distance.</p> <p>The services and facilities proposed as part of the new village at Beadlow include a new primary school, neighbourhood centre including retail facilities and hot food takeaway etc. The new golf clubhouse will also be able to offer on-site facilities to residents and this will include a bar/restaurant and also gym facilities. On-site facilities will cater for residents' day-to-day needs while sustainable transport improvements will offer options for higher-order services.</p>	
<p>4. Employment To support the economy and ensure that there are suitable opportunities for employment³</p>	<p>As with the smaller of the Council's assessed sites, employment provision on site is in the form of the retail uses on site, schools etc (mostly non-B class jobs). Unlike the other proposed sites, the retention and enhancement of the golf course will sustain existing jobs and create new opportunities as the provision of services broadens and custom at the bar/restaurant increases with new local patronage.</p> <p>Development at this location is likely to support the vitality and viability of local town centres, including Shefford, Amphill and Flitwick, with the potential for minor long-term positive effects⁴.</p>	<p>0 +</p>
<p>5. Health & Equality⁴ To improve the health and wellbeing of communities and reduce inequalities</p>	<p>This site option is not within or adjacent to an area of higher deprivation and thus unlikely to lead to any significant positive or negative effects.</p> <p>The Strategic Green Infrastructure Plan identifies the Beadlow site within the Flit Valley priority corridor. These corridors highlight areas where investment and project delivery can make most impact in securing multi-functional green infrastructure. A small part of the site also appears to lie within the Greensand Ridge Nature</p>	<p>0 ++</p>

² This relates to the provision of services and facilities, such as schools, healthcare centres, shops, and hospitality (café, restaurant, and pubs).

³ First symbol relates to employment support; second symbol refers to vitality/viability of town centres

⁴ First symbol refers to regeneration/deprivation; second symbol refers to vitality/viability of town centres

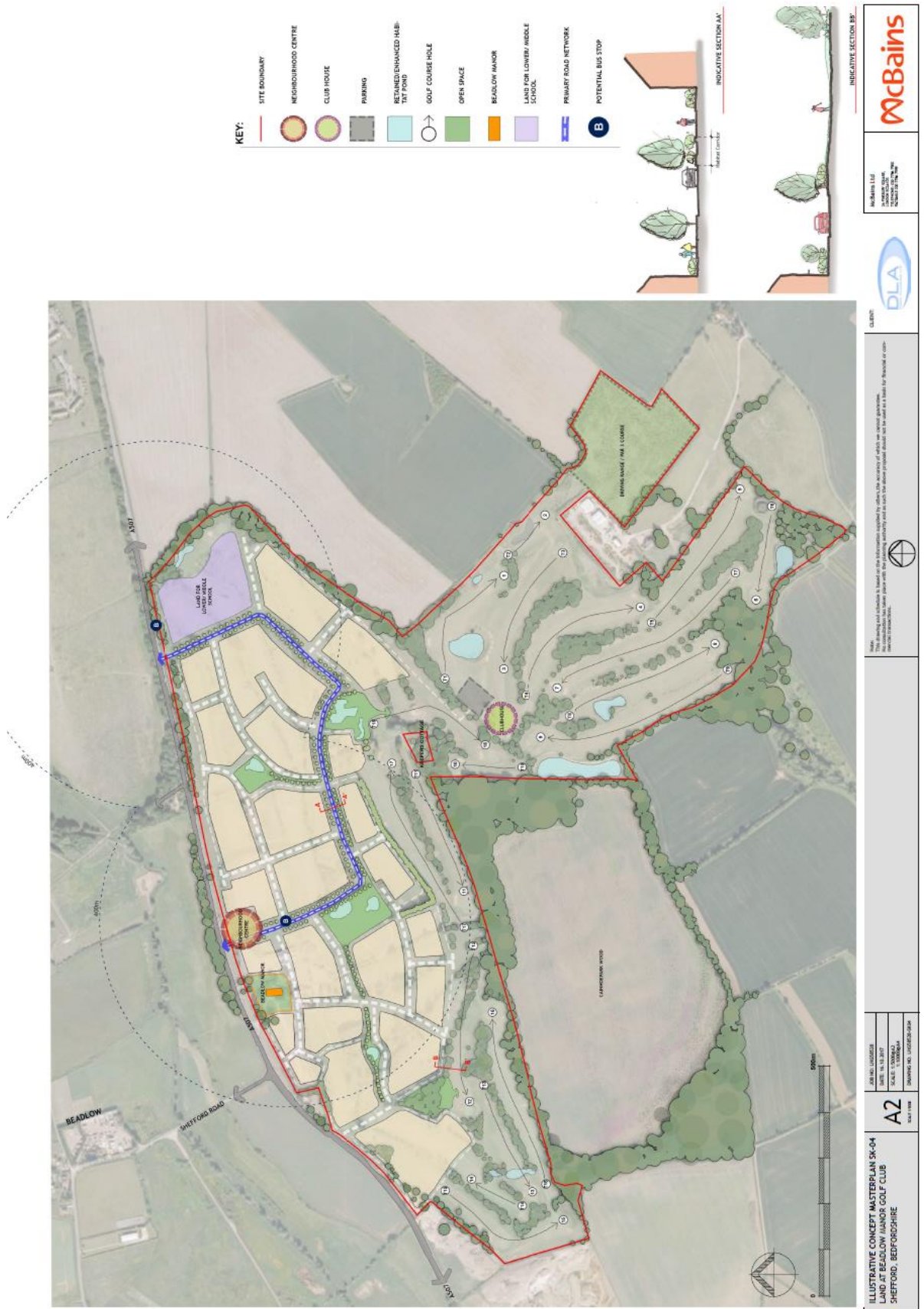
	<p>Improvement Area. The creation of a new settlement, with accompanying green infrastructure provision, has the potential to make a significant positive impact.</p> <p>The Beadlow proposal includes pockets of proposed green space, as well as a reconfigured 18-hole golf course and academy course. This access to green space and leisure facilities will help to promote a healthy lifestyle among residents in the new village and in the surrounding villages. Overall a significant positive is expected in relation to the second part of the SA objective.</p>		
<p>6. Highways & Air Quality To maintain and improve the existing highway network and reduce associated indirect impacts on air quality and greenhouse gas emissions</p>	<p>Growth in this location will put additional pressure on the A507. Key junctions along this route in the central part of Central Beds already have capacity issues and development at Beadlow will worsen this. However, the scale of development proposed enables substantial developer funding to be used to increase capacity at these junctions. The close link between the proposal and these junctions makes securing developer contributions easier when compared with trying to secure similar contributions from multiple smaller sites that have less impact. Electric vehicle charging points would be deployed through the development to help mitigate overall emissions. Uncertainty exists but overall a neutral effect is envisaged.</p>	0?	
<p>7. Sustainable Transport To encourage a demonstrable modal shift and reduce the need to travel</p>	<p>In line with the assessment under “3. Services and Facilities”, the key attribute of the Beadlow proposal is its walkable scale. A primary school, retail facilities, bar/restaurant, gym and golf course would all be within walking distance, helping to reduce day-to-day use of the car. Similarly, the Council offices represents a major employment hub which is also within walking distance of the site.</p> <p>The site is close to the existing urban area of Sheffield which is served by a number of bus services. It is anticipated that growth at this site could accommodate viable extensions to such services through appropriate development contributions. Access to nearby railway stations at Arlesey and Flitwick will be provided by a bus connection, details of which are currently being work up.</p>	+	
<p>8. Energy & Climate Change To maximise the potential for energy efficiency, reduce greenhouse gas emission and ensure that the build and natural environment and its communities withstand the effects of climate change</p>	<p>This site development could achieve policy targets for energy efficiency, high quality design standards and ensure resilience to the effects of climate change, with potential for renewable energy production. Uncertainty does arise here in terms of long-term effects.</p>	+?	

<p>9. Water Resources & Quality To minimise the demand for water and maintain or improve water quality</p>	<p>The addition of 1,600 new homes in this area is considered to have the potential for cumulative effects on water resources but uncertainty exists at this stage. As per the assessment of the other proposed sites, the Beadlow proposal is assessed as having a neutral effect with uncertainty</p>	<p>0?</p>
<p>10. Flood Risk To reduce the risk of flooding from all sources</p>	<p>This site is entirely in Flood Zone 1⁵ (low probability of flooding)</p>	<p>0</p>
<p>11. Soil To protect and conserve soil</p>	<p>Unlike all of the other proposed sites, none of the Beadlow Manor site is used for agriculture. Movement of soil will take place when creating the new golf course and the reshaping of the existing one. The Beadlow site contains a hotel, golf clubhouse, driving range and various other ancillary buildings. This central part of the site is clearly previously developed and the rest of the golf course would fall within the curtilage of these buildings. On this basis, the Beadlow site would be considered as previously developed land. This reflects the Council's conclusions for both Henlow Camp and Tempsford Airfield.</p>	<p>+</p>
<p>12. Biodiversity & Geodiversity To protect, enhance and manage biodiversity and geodiversity</p>	<p>There are no internationally designated biodiversity sites in or immediately around the site. The nearest SSSI is at Maulden Woods, some 3.5km from the site. There are no non-statutory designated sites (Local Wildlife Sites) within the Beadlow proposal boundary and 12 such sites within 2km of the site. As with the majority of the Council's assessed sites, the Beadlow proposal is assessed as having potential for both minor positive and minor negative impacts, with uncertainty at this stage.</p>	<p>+/-?</p>
<p>13. Landscape Protect and enhance the landscape and townscape</p>	<p>This site is not located adjacent to or within the designated AONB landscape. As illustrated within the submitted visual assessment, views of the site are localised, with the primary receptors being users of Amphill Road and Campton Road, and glimpsed views of the site being available from the localised Public Right of Way network. Within the context of the existing landscape character, the site is already characterised by a heavily managed and maintained golf course and its proximity to sporadic development. The retention and reinforcement of the existing boundary planting will ensure that a robust and defensible green edge to the site is produced. The use of an appropriate palette of materials and a carefully considered layout will ensure that the proposed redevelopment can be integrated in this location without undue harm. Views of the proposed development will also be highly localised and will not give rise to significant adverse effects. Currently views towards the site are characterised by a degree of built form associated with its immediate setting. The proposed development will not introduce new components that would appear alien or out of character within the context of these views.</p>	<p>+</p>

⁵ <https://flood-map-for-planning.service.gov.uk/summary?eastings=511255&northings=238371>

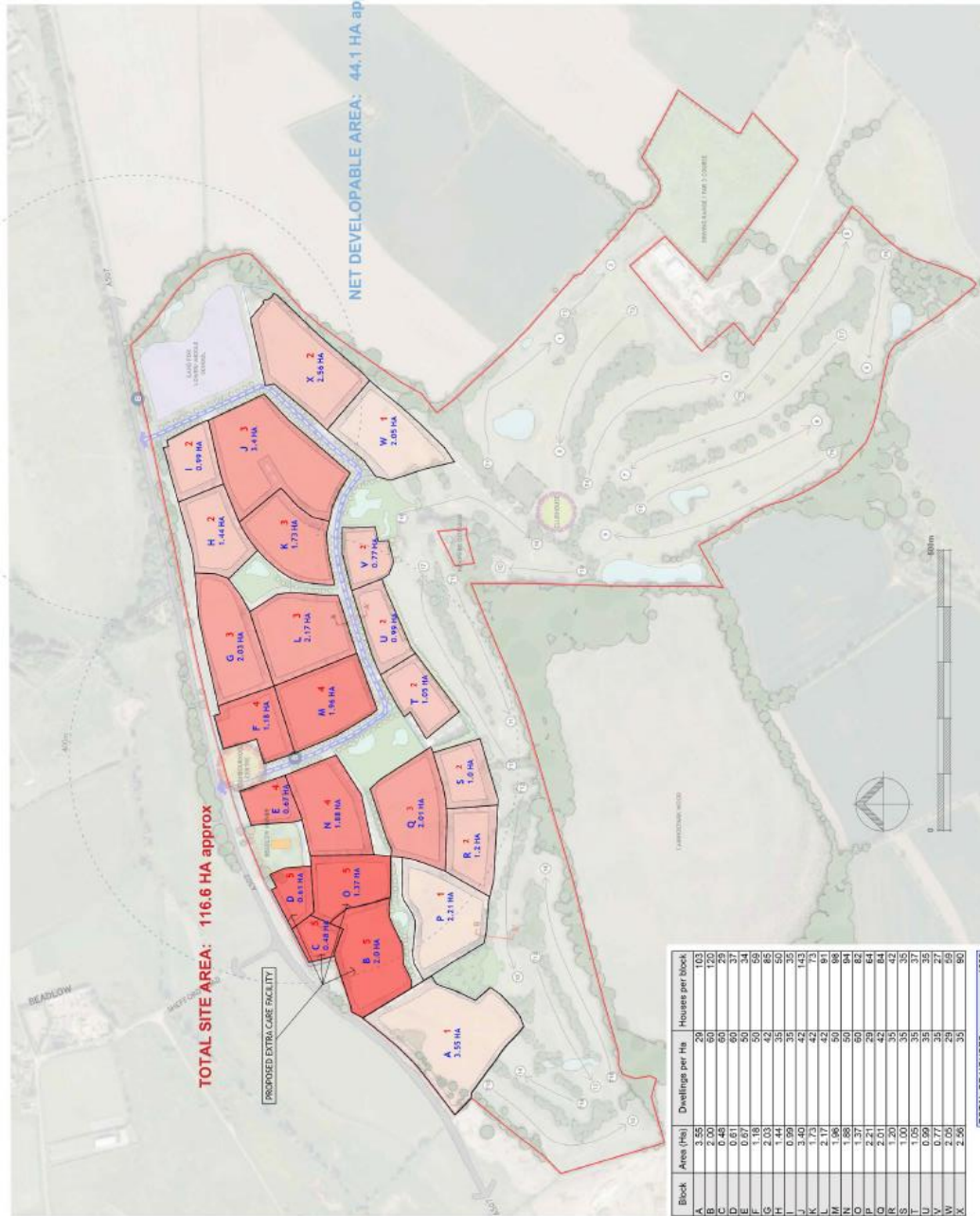
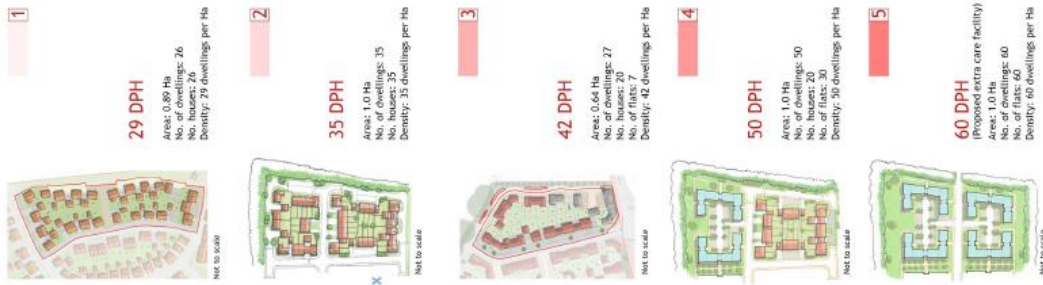
	<p>It is therefore considered that the proposed development of the site for residential development can be supported from a landscape and visual context and the site would be appropriate for taking forward as an allocation within the emerging Local Plan.</p> <p>The overall assessment is described as minor positive, which reflects the Council's assessment of the Henlow Camp site.</p>	
<p>14. Historic Environment To ensure the protection and enhancement of heritage assets, the historic environment, and its setting</p>	<p>There are two scheduled monuments which lie within 1km of the PDA. These include: the medieval motte-and-bailey and moated site of Cainhoe Castle. Furthermore, although located 1.5km to the north-west of the PDA, the scheduled site of Old St Mary's Church, Clophill is visible from the PDA. There are also twenty listed buildings in the villages of Beadlow, Upper Gravenhurst and Campton, which lie within 1km of the PDA. The PDA also lies within a medieval landscape, however as mentioned above, many of the heritage assets are located outside the area. The existing golf course creation has likely already truncated any archaeological remains. Thus, representing a neutral effect. A minor negative effect can be recorded considering the potential for impacts on the setting of the landscape due to the listed buildings in the neighbouring villages, although it is considered minor because there are only twenty listed buildings between three of the nearby villages. If required by the LPA any direct impact of the development on buried archaeological remains could be mitigated by measures put in place to record potential assets.</p>	-?

8.0 APPENDIX B – BEADLOW PARK MASTERPLAN



9.0 APPENDIX C – BEADLOW PARK DENSITY STUDY

DENSITY STUDY



McBains

DLA

AREA CALCULATION - 504
 LAND AT BEADLOW MANOR GOLF CLUB
 SHEFFORD, BEDFORDSHIRE

A2

DATE: 15/08/2020
 SHEET: 15/287/01
 SCALE: 1:5000
 DRAWN BY: 11/08/2020/SLM

CLIENT: SHEFFORD MANOR GOLF CLUB

DATE: 15/08/2020

PROJECT: BEADLOW MANOR GOLF CLUB DEVELOPMENT

SCALE: 1:5000

DATE: 15/08/2020