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RG/3030

29th August 2017

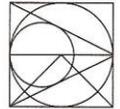
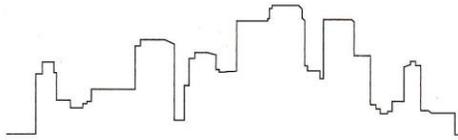
Mrs C. Frost-Bryant
Interim Local Planning & Housing Manager
Central Bedfordshire Council
Priory House
Monks Walk
Chicksands
Bedfordshire
SG17 5TQ

Dear Mrs Frost-Bryant,

Representations on Central Bedfordshire Draft Local Plan 2015 -2035

Introduction

These representations are submitted on behalf of Pigeon Land Ltd ('Pigeon'), who are promoting a sustainable new neighbourhood to the North of Sandy, as detailed in the Call for Sites submission made on 11th April 2016, which included a Delivery Statement setting out a vision for the site. The Site Assessment Technical Document includes a number of overlapping site references for Land North of Sandy. For clarity, a site location plan has been enclosed to confirm the extent of land that is being represented in this submission.



General

As a general point, whilst it is acknowledged that the Draft Local Plan (DLP) is only intended to be a first draft of the new development plan for Central Bedfordshire, it is still very much a work in progress, with a number of key decisions left open, or to be decided.

Notwithstanding, as set out in detail below, and in separate representations on the relevant Technical Documents published with the DLP, Pigeon acknowledge that there are main principles upon which the emerging Growth Strategy. However, they do have a number of specific concerns, which are explained in detailed within this submission. The comments made here are intended to be constructive in nature and to help ensure that the final version of the Local Plan can be considered sound when it reaches examination.

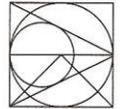
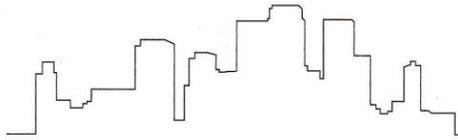
Vision and Objectives (Section 6, page 51)

Pigeon recognise the Vision for Central Bedfordshire set out in Section 6 of the DLP and the key objective of seeking to realise the opportunity for sustainable economic and infrastructure led growth of new homes provided by its strategic geographical position on the axis of the Cambridge to Oxford (East-West) corridor and key transport routes to London; namely the M1, A1, Midland Mainline Railway and the East Coast Railway. Given that Central Bedfordshire is competing with much larger centres such as Bedford, Luton, Milton Keynes and Stevenage, the final version of the Plan will need to be suitably ambitious if this aim is to be realised.

For consistency, it is considered that Strategic Objectives S02 and S08 should be amended to include reference to the commitment made in the DLP to assisting Luton Borough meet its unmet need in the Submission version of the Plan through a delivery of an additional 7,400 dwellings (as set out in Table 7.2 (page 70). Pigeon would suggest the Council should prepare a Memorandum of Cooperation / Understanding with Luton Borough to support this.

Spatial Strategy Approach (page 61)

Pigeon has concerns with the Spatial Strategy Approach set out on page 61. Notwithstanding the housing target, which is considered in more detail under the Growth Strategy below, the Spatial Strategy proposes this target to be met through new villages, a new market town and 'moderate' extensions to existing towns and villages.



The use of the term 'moderate' is unclear and requires further clarification. The Settlements Capacity Study assesses settlement capacity in terms of 'low' (<50homes), 'medium' (50-500 homes) or 'high' (>500homes). The use of the term 'moderate' is therefore confusing and should be updated going forward to be consistent with the low-medium-high references that have been used consistently in the preparation of the Local Plan and its supporting technical studies.

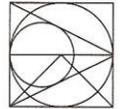
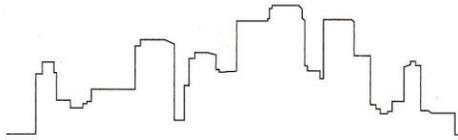
It could be presumed that the term moderate relates to a medium level of growth within existing towns and villages and is not compatible with a high level of growth of more than 500 dwellings. Although the DLP is not clear, it would seem to infer that existing settlements will receive up to 500 new homes. Pigeon would have concerns with this as an approach. It would be inconsistent with the Settlements Capacity Study which concludes (Appendix B, page 43) that Sandy has a high capacity for growth.

In addition, as detailed further below with regard to the Growth Strategy, Pigeon are concerned that the strategy places too much emphasis on new settlements with a moderate contribution from extensions to existing settlements. These new settlements are heavily reliant on new infrastructure with long-lead in times to delivery, which is acknowledged in the DLP. Accordingly, there needs to be the consideration of greater growth in sustainable locations such as Sandy, with the DLP currently lacking detail and clarity on the level of growth that could be allocated, in contrast to the conclusions of the Settlements Capacity Study and Site Assessment Technical Document.

Pigeon are promoting land North of Sandy as a sustainable urban extension that could provide up to 1200 homes, as well as currently preparing a planning application on part of that land for circa 225 new homes and community benefits including allotments, a family pub-restaurant and site for a new healthcare facility. The proposals for 225 homes are consistent with the current DLP in providing a moderate extension to Sandy, as a self-contained proposal. However, they would also work equally well as phase 1 of a sustainable urban extension consistent with Pigeon's previous promotion of this land.

Policy SP1: Growth Strategy (Pages 66/67)

In respect of the emerging housing target, Pigeon acknowledge the commitment in the DLP to allocate land for a minimum of 20,000 dwellings in addition to those expected to come forward from existing commitments over the Plan period. However the starting point for the DLP should be to seek to meet the full, unconstrained objectively assessed need (OAN) for market and affordable housing in the market



area in accordance with paragraph 47 of the NPPF and the requirement to 'boost significantly the supply of housing'.

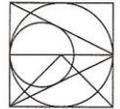
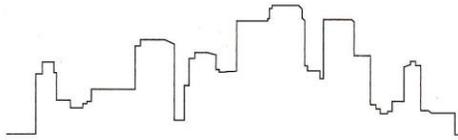
Pigeon has significant reservations on the OAN advanced by CBC, which it is believed significantly underestimates the level of housing need and fails to reflect up to date Government guidance on matters such as migration patterns and levels and accordingly will see a significant undersupply of housing. Pigeon believe there is a need to substantially increase the level of housing beyond the very general scale that the Council have at this stage advanced.

The pledge to provide 7,400 dwellings (Table 7.2, Page 70) towards Luton Borough's unmet need on the back of 'Duty to Cooperate' discussions with neighbouring Authorities is acknowledged, and it is the most pressing strategic cross boundary matter for CBC, particularly given the issues that led to the withdrawal of the Development Strategy. The Luton Local Plan examination hearings saw considerable objections made to the OAN for the Luton and Central Bedfordshire Housing Market Area in relation to the methodology used. Some 9,300 dwellings have been identified as not being able to be accommodated within Luton.

The DLP states that some 7,400 dwellings may be accommodated to assist in meeting the shortfall in Luton. Taking account of the unmet need from Luton at 7,400 dwellings the correct approach to considering the demographic need while making no allowance for response to market indicators would require a local plan requirement of 47,446 dwellings. A response to market indicators as recommended by LPEG would increase the Local Plan requirement for CBC to 55,940 dwellings

In order to pass the Duty to Cooperate, CBC must engage constructive, actively and on an ongoing basis with the necessary authorities from the outset of the plan preparation – i.e. now at the scoping and evidence gathering stage. Pigeon would again suggest that delivery of the unmet need could be reinforced by the preparation of a Memorandum of Cooperation / Understanding with Luton Borough.

Paragraph 7.7.2 of the DLP acknowledges that the next version of the Plan will need to include a certain level of growth as a contingency in case sites allocated fail to come forward, consistent with paragraph 47 of the NPPF. This will provide sufficient contingency to take account of lapse rates and in acknowledgment that not every site allocated will come forward on time, or even at all. One only has to look at the current adopted Plans for the north and south of Central Bedfordshire, which both include



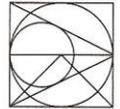
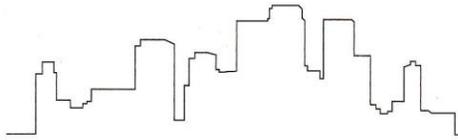
allocations that have yet to deliver any housing, for evidence of this issue. This approach of allocating more land than is specifically calculated as being required will be essential in providing a safeguard to ensure the housing numbers needed do actually come forward, and in this respect the Plan can be considered to be positively prepared as required by paragraph 182 of the NPPF.

Pigeon acknowledges the strategy aim (Paragraph 7.2.1) of growing existing communities so that they are more sustainable through improved services and facilities. Their vision for a scheme North of Sandy outlined in the Call for Sites submission for the site, including Delivery Statement, is very much aligned with this approach. The planning application currently being prepared for approximately 225 new homes includes a site for a new surgery and a family public house/restaurant, as well as the provision of new allotments for which there is an existing deficit in Sandy. These would increase the range of facilities in the area to the benefit of both existing and future residents and have been developed to meet an identified need through public engagement as well as being consistent with the recommendations of the Settlement Capacity Study for Sandy

Pigeon also acknowledges the key principle underpinning the emerging spatial strategy for Central Bedfordshire of focusing as much development as possible along key transport corridors and interchanges (Paragraphs 7.3.1 and 7.5.1) and development at Sandy would be consistent with this approach. Pigeon again have concerns about the extent to which the growth options identified in the DLP are dependent on this new infrastructure, with further comment made on this below.

Development North of Sandy, as promoted by Pigeon, is again entirely consistent with this strategy. The land is located in close proximity to the A1, with excellent access to it, while there is also an existing station on the East Coast railway line in Sandy that would be easily accessible to residents of a development. In addition, the preferred location of a new East-West Rail station, which will provide an interchange with the existing East Coast Mainline, is to the north of Sandy, with the precise location likely to be confirmed next year, following consultation on the different options. The effect of this is that the area to the north of Sandy will ultimately be transformed into one of the most sustainable in Central Bedfordshire.

Pigeon do have a major concern with the emerging approach to the Growth Strategy outlined in Policy SP1 and the supporting text, however. This is the potential reliance being placed on the delivery of housing from a small number of new settlements (both towns and villages) and significant urbans



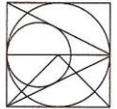
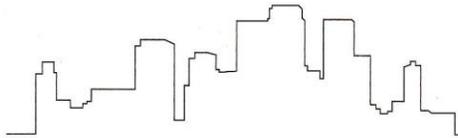
extensions (2,500+ homes), which could ultimately lead to a failure to meet the housing target for the area, particularly in the early years of the Plan. They are also objecting to one of the favoured new settlements, Tempsford South and Tempsford Airfield, as will be also be explained further below.

Strategic scale development schemes, such as those being considered for inclusion in the Local Plan (pages 80-109), inevitably have lengthy lead-in times with greater risk of delays in delivery due to complicated landownership arrangements and the requirement for substantial new infrastructure to facilitate them. One only has to look at the time it took from inception for The Wixams new settlement to start delivering housing (approximately 30 years) as evidence of this.

In contrast, the capacity of the sustainable new urban neighbourhood promoted by Pigeon to the north of Sandy is approximately 1200 homes, which is not reliant on substantial new infrastructure for delivery. A planning application is currently being prepared for circa 225 new homes and community benefits, which would equally work as phase 1 of a new neighbourhood, or in isolation consistent with the current DLP as a 'moderate expansion' to Sandy

From a review of the of potential strategic scale housing growth locations provided in section 8.5 of the DLP it is evident that all of these will be dependent on the provision of substantial new infrastructure, and in some cases this infrastructure would need to be funded and/or delivered by third parties and not the Council or the promoters of the site, meaning delivery timescales are out of their control and even less certain. This is summarised in Annex 6 of the Residential Development Viability Report
The table below highlights this point and the supporting text to Policy SP1 even acknowledges that delivery from some of these sites may extend beyond the Plan period.

Site	Major Infrastructure Required
North of Luton	Dependent on delivery of the M1 – A6 link road, which is partly being funded by the Government through SEMLEP
Tempsford South and Tempsford Airfield	Requires a new train station to form an interchange between East-West Rail and the East Coast Main Line. This is dependent on the Government and Network Rail New junctions on the A1 and A428 will be required, along with improvements to the A1
New Villages to the East of Biggleswade	A comprehensive scheme of highways works is required to mitigate the impact of increased traffic on the A1



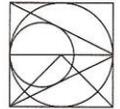
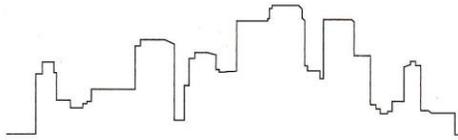
Marston Vale New Villages	A comprehensive scheme of highway measures is required to mitigate the impact of increase traffic on M1 J13 and the A421
Aspley Triangle	A comprehensive scheme of highway measures is required to mitigate the impact of increase traffic on M1 J13 and the A421

Additionally, there is also a limit to the number of housing completions achievable from a single site in a year even in a prosperous economic climate. Were the final version of the Plan to rely on too small a number of allocation sites to meet the high housing requirement it would increase the likelihood of shortfalls in the housing supply occurring during the Plan period, meaning the Council would again be open to speculative planning applications in less sustainable locations than Sandy North

Pigeon therefore encourages the Council to develop a final growth strategy that relies less on these new settlements and significant urban extensions of 2500 houses and instead, or in addition given the requirement for contingency, allocates a greater range of sites, including smaller sites which are generally less complicated and quicker to deliver, in order to ensure that the substantial housing need is met throughout the Plan period, but would still deliver tangible benefits to existing communities in the way Pigeon is proposing to do as part of a scheme for North of Sandy.

The Submission Local Plan could still identify longer term growth locations as part of the strategy for facilitating their delivery, but it should avoid being reliant upon such sites to provide any significant housing numbers during this Plan period for the reasons outlined above in order to ensure the Growth Strategy and as a consequence, the Plan, are considered to be positively prepared, justified and effective as required by paragraph 182 of the NPPF. Such longer terms strategic sites could instead be included in a review or a specific development plan document, once there is more certainty around delivery timescales etc

For the Submission Local Plan to be considered the most appropriate strategy, when considered against the reasonable alternatives, it should include growth at North Sandy. Sandy is defined as a Major Service Centre and therefore lies at the top of the Settlement Hierarchy in both the adopted development plan and that proposed in the DLP. The Council's Settlements Capacity Initial Study July 2017, upon which separate representations have been made, indicates that Sandy has high capacity for growth, i.e. for greater than 500 dwellings, a conclusion that Pigeon endorses.

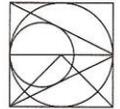
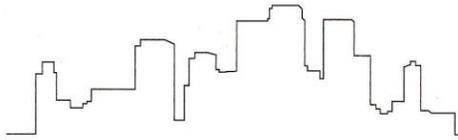


Growth at Sandy has been restricted by a lack of allocations in recent development plans for the area. This is acknowledged in the technical evidence published with the DLP, which confirms that only a 7% increase in the total housing number has taken place in Sandy in the past 10 years. If outstanding completions are built out, merely an additional 0.41% would be added to this total. Other less sustainable locations have taken considerably more housing in the past 10 years and have further commitments still to be built out. Failure to allocate growth to Sandy within this plan would be untenable given its status as a Major Service Centre and one of the most sustainable locations in Central Bedfordshire, particularly as there was not an allocation in the previous Local Plan. Should Sandy once again miss out on an allocation for new homes in the emerging Local Plan, this will be a significant period without affordable housing provision and new open space, green infrastructure and other community benefits that new homes can bring. Similarly, new homes enhance the viability of local shops and services, including public transports providing a 'shot in the arm' to the local area. It is difficult to see how the spatial strategy approach set out on page 61 for regeneration of urban areas including Sandy can be delivered without new homes and investment into the town. Indeed there is a risk that the new settlement of circa 7000 new homes at Tempsford directly competes with Sandy in terms of its town centre offer.

The case for growth at Sandy to be allocated to the north of the town is compelling. First and foremost, there is suitable and deliverable land available to the north of Sandy, where Pigeon are promoting a sustainable new neighbourhood. This is supported by the conclusions reached on the sites put forward around Sandy in the Site Allocations Technical Document, upon which separate representations have been submitted and further comment is made below.

Sandy is constrained to the west by the A1, which, along with the flood plain of the River Ivel forms a substantial barrier essentially prohibiting expansion in that direction. To the south the River Ivel's flood plain again forms a major constraint to development, whilst to the east the East Coast Mainline Railway is a significant barrier.

This leaves the land to the north of the town as the only unconstrained area on which new development can take place. This point is acknowledged by the Settlements Capacity Initial Study, which states *"the environmental constraints can largely be avoided through the appropriate siting and integration of development, particularly in the north of the settlement"* (Annex B page 43).



Furthermore, Sandy is already planned to be extended northwards on the eastern side of the existing northern boundary adjacent to the railway through the allocation of employment land there, which reinforces the appropriateness of the north of Sandy as a direction for growth.

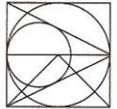
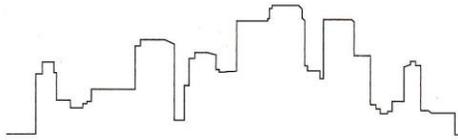
In addition, as has already mentioned above, an East-West railway station is proposed to be located to the north of Sandy and will provide an interchange with the existing East Coast Mainline Railway. This will be a catalyst for transforming the area north of Sandy in sustainability terms and makes it essential that Sandy is allowed to growth in this direction.

Objection: As explained in greater detail in the representation on the Site Allocations Technical Document, Pigeon do not agree with the Stage 2 Assessment Conclusion, which appears to be the same for all of the land parcels to the north of Sandy submitted, that development of the entire site would be an illogical extension to the settlement and would cause harm to its character and that of the countryside.

The Vision for North Sandy outlined by Pigeon in the Delivery Statement included with the Call for Sites Submission made on their behalf demonstrates how a sustainable new neighbourhood could be created through the allocation of the wider land identified as Parcel NLP414.

Objection: Pigeon are very concerned that the DLP indicates potential support for a new settlement at Tempsford South and Tempsford Airfield, seemingly at the expense of a larger urban extension to the north of Sandy. Such a conclusion is not justified on the basis of the Council's own evidence base. The North Central Bedfordshire Growth Options Study (July 2017) concluded that the development north of Sandy (Site N11 referred to as Sandy North West) has an overall delivery potential of moderate compared to low for Tempsford South and Tempsford Airfield (Site N10 referred to as Sandy North East). North of Sandy was also assessed to have less secondary constraints (5) compared to Tempsford South and Tempsford Airfield (6), better access to services and facilities by foot and better access to employment opportunities within 30 minutes.

The study also estimates that growth North of Sandy would be able to deliver more housing during the Plan period (2,500 dwellings) than a new settlement at Tempsford (2,000 dwellings). Given the scale of development required over the Plan period this should not be overlooked.



In addition to the above development North of Sandy would deliver new facilities in an existing location, thus benefiting existing residents in Sandy, particularly those to living at the northern end of the town and would provide new investment, where this has been lacking in past development plans. This accords with paragraph 7.2.1.

For all of the above reasons Pigeon contend that the Submission Version of the Local Plan should allocate a sustainable new urban neighbourhood to the north of Sandy, either instead of, or in addition to Tempsford South and Tempsford Airfield.

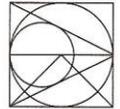
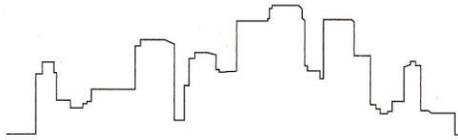
Section 8.1: Phasing

Paragraph 8.1.1 of the DLP suggests that the Council is considering phasing the delivery of development sites to try and ensure a continuous supply of housing, and that a phasing plan will be included in the next version of the Plan. Pigeon are concerned that rather than support the delivery of new homes, such a phasing plan may in fact hamper this if it tries to tie down when sites should come forward. The delivery of sites is ultimately dependent upon developers and landowners and rather than seeking to control and schedule when sites come forward, the Council's role should be one of seeking to enable this.

Section 10: Settlement Hierarchy

Pigeon supports the retention of Sandy as a Major Service Centre at the top of the proposed Settlement Hierarchy included in Section 10 of the DLP. This reflects the fact it is a sustainable location for new housing and is justified by the evidence presented in the Settlements Capacity Initial Study (date) upon which separate representations have been submitted.

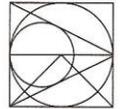
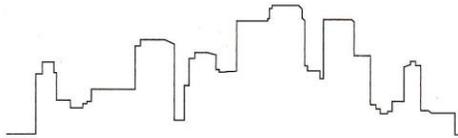
The assessment of Sandy in the Settlements Capacity Initial Study confirms it has an excellent level of service provision and is also very well served and connected by public transport. The planned provision of an interchange station between East-West Rail and the existing East Coast Mainline will only increase the sense that Sandy should be a primary location for new growth due to its inherent sustainability. As already commented upon, growth at Sandy has been minimal in successive past Plans and it is long overdue new housing development to reflect its position in the Settlement Hierarchy.



Development Management Policies

The DLP includes a range of draft planning policies. Pigeon wish to comment specifically on the following policies:-

- Policy H7 Self and Custom Build – relevant to sites of 10 dwellings or more.
Pigeon support the principle of self and custom build housing and have successfully delivered this provision on other sites. Self-build plots are also included within the concept proposals for the application for circa 230 homes at Sandy North. However, Policy H7 should provide greater clarity on the mechanism and terms for offering plots to those on the self-build register. Indeed Pigeon would question whether there needs to be a mechanism at all as the register only includes those who have expressed an interest whereas a release on the open market will see concrete offers come forward on specific plots and is a more accurate test of interest and demand in self and custom build plots than the register.
- Policy R1 'Ensuring Town Centre Vitality'
Pigeon has no specific comments on this policy but would reiterate their previous statements that new homes are required at Sandy North to stimulate regeneration of Sandy Town Centre which has suffered from a lack of housing allocation in previous Local Plans.
- Policy T2 Mitigation of Transport Impacts on the Network
Pigeon has no objection to the principle of this policy and the requirement for Transport Assessments, Travel Plans and promoting sustainable methods of transport. However, paragraph 5 which references proximity to bus and rail services is not clear and should be refined. If this is a requirement of new development, the ability for new homes to enhance existing provision and the viability and frequency of services should be recognised when assessing proposals.
- Policy T6 Strategic Transport Improvements
Pigeon recognises the aspirations within the Local Plan for delivery of the Strategic Transport Infrastructure referenced in this policy. Again we would reiterate that strategic growth options in Central Beds are overly reliant on this infrastructure to deliver the housing required with no certainty that this will come forward. This is highlighted in the final paragraph of Policy T6, which references contributions being sought towards the strategically important infrastructure. However, the policy is not clear, which projects would contribute, or the mechanism for doing so as CBC does not currently have CIL in place and contributions via S106 would be limited under the 'pooling' criteria and the tests of a S106 contribution being applicable to the development.



Accordingly, further information is required as to how this will operate. This policy also raises a 'chicken and egg' scenario in that the DP is clear that for strategic sites such as Tempsford (page 86 onwards), the infrastructure is essential for their delivery. Therefore, the infrastructure will need to be in place ahead of development. This raises questions as to whether the sites that will benefit most from the infrastructure will contribute towards it in terms of the timings and phasing of development.

- Policy HQ1 Health Impact Assessments

It is difficult to comment on this policy without understanding the thresholds and requirements of the forthcoming Health Impact Assessment SPD. Pigeon therefore reserves the right to comment further once the SPD is published.

- Policy HQ9 'Larger Sites'

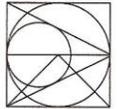
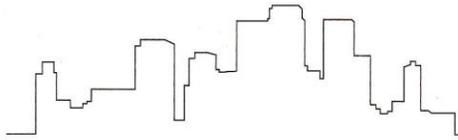
Pigeon notes the potential requirement for Development Briefs and Design Codes. However the Council should ensure that these requirements do not add additional complication or delay to the delivery of sites.

Representations on the Settlements Capacity Initial Study July 2017

These representations are submitted on behalf of Pigeon Land Ltd ('Pigeon'), who are promoting a sustainable new neighbourhood to the north of Sandy, as detailed in the Call for Sites submission made on 11th April 2016, which included a Delivery Statement setting out a vision for the site. Separate but related submissions have been made on the Draft Local Plan and other technical evidence published with it, including the Site Allocations Technical Document.

Pigeon supports the approach adopted in the Settlements Capacity Initial Study and particularly the conclusion (Appendix B, page 43) reached in respect of Sandy that it has high capacity for growth; i.e. for 500+ dwellings in paragraph 2.2. The methodology adopted for determining capacity at a settlement level is both comprehensive and robust and has led to sensible conclusions, which should inform the growth strategy incorporated in the final Submission version of the Local Plan.

As has been argued in the separate representations submitted on the Draft Local Plan itself, there has been a lack of development allocated to Sandy in successive development plans and new growth there is considered overdue given the inherent sustainability of Sandy as a settlement, which is reinforced by



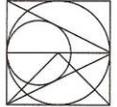
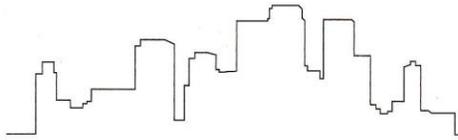
the likelihood of there being a new interchange station there connecting East-West Rail with the East Coast Mainline.

Pigeon also largely endorse the comments made in the section on Sandy in Appendix B, which reviews potential constraints in different broad directions to the town and which concludes that *“environmental constraints can be largely avoided through the appropriate siting and integration of development, particularly in the north of the settlement”* (Emphasis added, page 43).

However, in respect of the concern raised (again Appendix B, page 43 regarding land around Highfield Farm rising so that growth would be more dominant, Pigeon would object to this Statement and the CBC studies do not appear to evidence this from any landscape and visual appraisal. By contrast, Pigeon has appointed Liz Lake Associates to prepare a Landscape, Townscape and Visual Issues Study (LTVIS), which concludes that development of the site would have minimal effect in landscape terms, minimal effect on views and is a logical extension following the urban morphology of Sandy. The LTVIS is submitted as part of Pigeon’s representations.

In response to the comment made about the location being remote from the town centre we would stress that a development of the scale proposed would deliver a number of its own benefits and facilities as is acknowledged later in the Appendix B conclusion on Sandy. This was stressed in the Call for Sites Submission made for North Sandy on behalf of Pigeon and in the Delivery Statement that accompanied it. As evidence of this, the application being prepared development, includes both a new surgery, family pub/restaurant, and allotments to accompany circa 25 new homes, which will add to the facilities in this part of Sandy to the benefit of both existing and proposed residents, with the allotments helping to meet an existing town-wide deficit. Pigeon’s proposals will also enhance footpath and cycle links from north Sandy and Pigeon would contend that given the size of Sandy, the town centre is not distant, particularly in comparison to peripheral growth in other larger settlements.

The availability of land to the north of the town that is both suitable and available for new development adds further to the justification for the conclusion reached in the Settlements Capacity Initial Study.



Representations on North Central Bedfordshire Growth Study

These representations are submitted on behalf of Pigeon Land Ltd ('Pigeon'), who are promoting a sustainable new neighbourhood to the north of Sandy. Separate but related submissions have been made on the Draft Local Plan and other technical evidence published with it that are of relevance to our Clients, including the Site Allocations Technical Document.

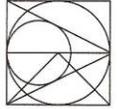
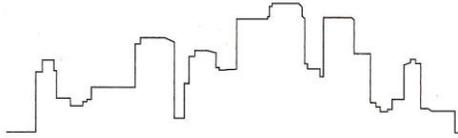
Pigeon broadly agree with the methodology used in the North Central Bedfordshire Growth Options Study and particularly the findings in respect of location N10, known as Sandy North East, which takes in the land being promoted by Pigeon. These demonstrate that a sustainable urban extension to the north of Sandy is a more deliverable and appropriate solution to meeting housing needs in this area than the new settlement proposed at Tempsford South and Tempsford Airfield (Location N10), referred to in the Study as Sandy North East.

Specific comments have been made on the Draft Local Plan to this effect and arguing that an urban extension to the north of Sandy should be taken forward as an allocation in the Submission Version of the Local Plan as a consequence.

Representations on Development gain and economic benefit from East West Rail

These representations are submitted on behalf of Pigeon Land Ltd ('Pigeon'), who are promoting a sustainable new neighbourhood to the north of Sandy. Separate but related submissions have been made on the Draft Local Plan and other Technical Documents published with it that are of relevance to our Clients.

Having reviewed the Development gain and economic benefit from East West Rail Report, Pigeon would query why no assessment has been undertaken of the benefits that would be derived from a major urban extension to the north of Sandy and the study has only focused on a potential new settlement at Tempsford South and Tempsford Airfield. Were the Study to have considered both options it would have been aligned with the North Central Bedfordshire Growth Options Study that looked at both and concluded that an urban extension to the north of Sandy is more deliverable and more sustainable.



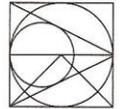
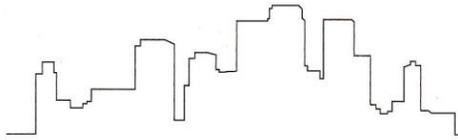
Representations on Site Assessments Technical Document

These representations are submitted on behalf of Pigeon Land Ltd ('Pigeon'), who are promoting a sustainable new neighbourhood to the north of Sandy. Separate but related submissions have been made on the Draft Local Plan and other technical evidence published with it that are of relevance to Pigeon.

The land put forward on behalf of Pigeon in a Call for Sites submission made on 11th April 2016 has been identified as site NLP414 in the Site Allocations Technical Document. This relates to proposals for a comprehensive scheme north of Sandy that also takes in a number of other parcels (ALP319, ALP320 and ALP375) put forward individually through the first Call for Sites in 2014. Comments on the conclusions reached on Parcel ALP320, which broadly equates to the planning application for 225 new homes and other benefits are provided below, along with the conclusions on the comprehensive scheme (NLP414), although it is noted that the Site Assessment Forms for both are on the whole identical.

First and foremost, Pigeon support the conclusion that both the individual parcel (ALP320) and the comprehensive site (NLP414) pass all 3 Stages of the assessment as being suitable, available and achievable and will be considered further for allocation in the Submission Version of the Local Plan. As has been expressed in the separate representations submitted on the Draft Local Plan itself and those on the Settlements Capacity Initial Study, it is imperative that the final version of the Plan allocates land at Sandy commensurate with its inherent sustainability, as indicated by the evidence based published with the Local Plan. This is especially important given the lack of growth in the town in the last 10 years and the very low number of outstanding commitments.

Given the likelihood of a future interchange station linking East-West Rail and the East Coast Mainline being delivered to the north of the Sandy, growth on that side of the town is entirely logical, a conclusion reinforced by the existence of constraints to the east (the railway), south (the flood plain of the River Ivel) and west (the A1 and the flood plain of the River Ivel), leaving the north as the obvious choice. This is acknowledged in the Settlements Capacity Initial Study. The Site Assessment Forms also acknowledge that there are no physical constraints or permanent features that would affect either the phase 1 land or the wider site from being delivered.

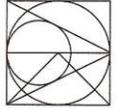
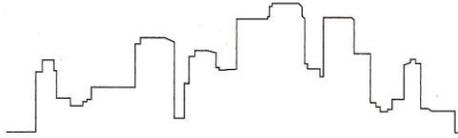


Importantly, there is land available and being actively promoted to the north of Sandy that is under the control of a developer in Pigeon that has considerable experience and a proven track record of delivering high quality sustainable development of this nature, as set out in the Delivery Statement (Section 3) that accompanied the Call for Sites Submission made for the comprehensive site. As already mentioned, Pigeon's appointed professional team are in the process of preparing an outline planning application,, which could be a first phase of a wider sustainable urban extension to the north of Sandy or a standalone new neighbourhood. This further demonstrates the deliverability of this land. Where appropriate, the findings of emerging technical reports are considered in more detail below.

Pigeon does, however, strongly disagree with some of the detailed comments made on the Assessment Forms for parcels ALP320 and NLP414 and particularly the Stage 2 conclusion. This suggests that development of the entire site would be considered an illogical extension to the settlement of Sandy that would cause harm to the character of the settlement, which includes the pattern of development. It goes on to suggest harm to the intrinsic character and beauty of the countryside.

This view is not backed up by any further explanation or reasoning and is not justified. The area of land in question is framed by the A1 to the west and the East Coast Railway to the east, two significantly urbanising influences, and immediately joins Sandy along its southern boundary. It is not understood how its development would result in the harm identified. This view is not supported by the LTVIS prepared by Liz Lake Associates, which concludes that development of the site would have minimal effect in landscape terms, minimal effect on views and is a logical extension following the urban morphology of Sandy. The LTVIS is submitted as part of Pigeon's representations and also confirms the ability to include the aspiration for Green Infrastructure as part of any development.

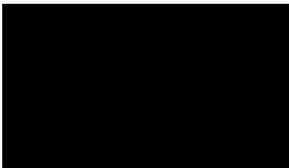
The Stage 2 conclusion does go on to suggest that a proportion of the site to the south would not result in significant harm and there are no constraints that would prevent the development of this portion of the site, subject to acceptable details that would mitigate noise impacts from neighbouring commercial uses as well as the A1, provision for the net gain for biodiversity and would mitigate impacts upon non-designated heritage assets with archaeological interest. It does not clarify what extent of the land 'a proportion of the site' would take in. However the assessment work undertaken by Liz Lake Associates, Pigeon rebuts this statement and defines that there are no landscape, visual or townscape effects that would preclude allocation and development of the whole site being promoted by Pigeon The LTVIS also picks up the inconsistency between the Stage 1 and Stage 2 conclusions within the CBC study.



In respect of the other issues flagged up (Noise, biodiversity and heritage) these would all be addressed through the planning application process and you would expect technical assessments relating to each to typically support an application for a development of this scale. In respect of the planning application, these are in the process of being prepared. From the work undertaken to date, there are no constraints that would preclude development of the site coming forward. The allotments will be provided along the western boundary of the site, which together with the associated landscaping, will buffer the new homes from the A1.

A Preliminary Ecological Appraisal has been undertaken which demonstrates limited ecology, which is restricted to the field margins and would not preclude the site's development. Indeed taking the fields out of agricultural production, enhancement of boundaries and significant green space including allotments will see an enhancement in ecology in this location.

Yours sincerely
For and on behalf of Woods Hardwick Planning LTD



RUSSELL GRAY
DIRECTOR

Enc

Cc Mr G. Bloomfield, Pigeon Land Ltd