



Local Plan
Central Bedfordshire Council
Priory House
Monks Walk
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Shefford
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BY EMAIL: LocalPlan@centralbedfordshire.gov.uk and post

29 August 2017
OHB038/hj

Dear Sir or Madam,

**CENTRAL BEDFORDSHIRE LOCAL PLAN 2015 – 2035 REGULATION 18
CONSULTATION: Response on behalf of O&H Properties Limited in relation to Policy
MA3 Land**

We write on behalf of our client O&H Properties Limited (O&H) in response to Regulation 18 consultation on Central Bedfordshire Council's (CBC) Local Plan 2015 – 2035 (the emerging Local Plan). O&H control land allocated for development under Policy MA3 of the *Central Bedfordshire (North): Site Allocations Document Plan Document* (April 2011) (Site Allocations DPD) and have a promotional agreement in respect of Land South of Wixams, which is subject to an outline planning application (reference CB/17/02575/OUT).

This representation relates to the Policy MA3 land. Separate submissions – made jointly with Old Road Securities – address Land South of Wixams.

Terminology

Land allocated under adopted Policy MA3 is referred to in the Site Allocations DPD as 'Land south of Wixams'. The land south of MA3 was proposed to be allocated under the (now withdrawn) Central Bedfordshire Development Strategy and was identified as draft Policy 63.

The emerging Local Plan now uses the name 'Land South of Wixams' in relation to the draft Policy 63 land.

We recommend that a clearer naming convention is utilised for the next stage of plan-making.

For the purpose of this representation, we use 'Policy MA3 land' to refer to O&H's landholding immediately south of Wixams. This land is shown on the enclosed plan OHB025/055.

In this representation, we use 'Land south of Wixams' to refer to the land subject to planning application reference CB/17/02575/OUT as described above.

Summary

O&H remain absolutely committed to the development of the Policy MA3 site and support the Council's continued policy stance for its delivery to help meet the Council's housing need during the plan period. However, O&H consider that the site is capable of meeting housing need earlier in the plan period than envisaged by the Council. Indeed, O&H is in a position to

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progress work to prepare an application for the development of the MA3 site but this work is being delayed because of uncertainty relating to the constraints established by the Council's planning policy. O&H suggest that there is a shared interest in reviewing the sites policy position to allow for the site to come forward earlier than as restricted by Policy MA3 of the Site Allocations DPD.

O&H also believe that additional land should be brought into the allocation. For those reasons, O&H believe that an updated policy statement should be expressed in the emerging Plan in relation to the MA3 land.

O&H are also concerned that the approach taken within CBC's evidence base does not sufficiently demonstrate the cumulative sustainability of the potential growth which could be directed towards the area south of Wixams Main Settlement by the emerging Local Plan.

O&H's comments relating to Policy MA3 land on the emerging Local Plan are set out in detail below. O&H have provided a recommended approach which the Council should adopt to ensure that the Council's strategy for growth to the south of Wixams Main Settlement and reliance upon the delivery of the Policy MA3 land is suitably sound and robust to examination of the Local Plan.

Context

O&H is a private sector stakeholder with substantial landholdings in the Marston Vale and has several ongoing development projects within Central Bedfordshire. O&H has a long-standing reputation for delivering strategic scale development in sustainable locations and has significant experience in stimulating the growth of new and existing communities.

Land allocated under Policy MA3 of the Site Allocations DPD is located immediately south of the southern boundary of the Wixams Main Settlement. A Site Location Plan is enclosed (OHB025/055). The site is one of the original Wixams 'Expansion Areas' as identified in the Elstow Development Brief (1999).

Policy MA3 the adopted Site Allocations DPD allocates the site for mixed use development for 1000+ new homes, 5ha of employment uses, and other mixed uses.

Wixam Park Master Plan Document

A Master Plan document was approved by CBC for development management purposes in April 2015 – *Wixam Park Master Plan Document*. This document establishes an Indicative Framework Plan for the Policy MA3 site together with the Land South of Wixams as identified in the emerging Local Plan. The emerging Land South of Wixams is one of thirteen locations subject to further assessment of sustainability and deliverability for new development within the emerging Local Plan.

The Policy MA3 land and the Land South of Wixams are separate policy areas under separate land control but have been comprehensively master planned within the Wixam Park Master Plan Document.

An outline planning application was submitted for mixed use the development of the Land South of Wixams site comprising up to 650 dwellings on 23rd May 2017 (CBC Ref – CB/17/02575/OUT).



CBC Call for Sites April 2016

O&H's April 2016 Call for Sites submission highlighted the context of the Policy MA3 land as an existing allocation within the Site Allocations DPD to provide 1,000+ dwellings. O&H's call for sites submission included circa 8.4 ha of additional land immediately adjoining the MA3 allocation. This additional land has the potential to comprise a strategic open space and additional residential land to with the capacity for around 130 additional dwellings.

O&H's Comments on the emerging Local Plan relating to Policy MA3 land

1. The Sustainability Appraisal

The *Sustainability Appraisal* (July 2017) ('SA') sets out the Growth Scenario Options that have been tested in the overarching sustainability appraisal of the plan. Table 5.3: Growth Scenario Options Potential Housing Numbers, shows that the Council tested 1,000 dwellings in Area C for 'Wixams South' but has identified a capacity of 500 homes under the Land South of Wixams Growth Location.

The scope of the Sustainability Appraisal is limited to testing scenarios for new strategic growth with the potential to be included within the emerging Local Plan as new allocations. O&H agree that it is sensible to test with 'headroom' between the 500 homes identified for Land South of Wixams (as well as the 650 proposed in the current planning application) and the 1,000 tested for SA. However, O&H are concerned that the SA has not fully tested the sustainability of new allocations in addition to the existing allocation of 1,000+ dwellings established by Policy MA3 of the Site Allocations DPD.

O&H are concerned that this approach does not give the fullest consideration of the cumulative sustainability of the potential development of new potential new allocations of Land South of Wixams alongside the development of 1,000+ dwellings at Land South of Wixams allocated by Policy MA3 of the Site Allocations DPD.

O&H Recommendation: O&H recommend that further consideration is given to the cumulative effect of the maximum potential quantum of growth which could be directed towards the area to the south of the Wixams Main Settlement. This should comprise an assessment of the cumulative sustainability of the delivery of 1000+ dwellings at Land South of Wixams and the development of Wixams Southern Extension.

2. Existing Commitments

Draft Policy SP1: Growth Strategy indicates that a minimum of 20,000 additional new homes will be delivered in Central Bedfordshire during the plan period. The draft policy is clear that the Council:

"will also continue to support the delivery of the existing committed sites".

O&H strongly support the Council's policy intention to continue to support the delivery of existing committed sites. The status of the Policy MA3 land as a committed site is noted in the *Site Assessment Technical Document* (July 2017). This assessment indicates that MA3 was considered in the initial site assessment and was "excluded from Local Plan process" as the site fails 'Stage 1D' as "The site is already allocated for housing in the adopted North Core Strategy (Policy MA3)".

Whilst this reinforces the suitability of the site for development and upholds the Policy MA3 allocation, O&H do not consider that the emerging Local Plan is sufficiently clear



in relation to the policy status of the sites which are relied upon to deliver 23,138 dwellings as set out in Table 7.2: Housing Need & Delivery. The emerging Local Plan does not provide sufficient and formal confirmation of the planning policy status of Policy MA3 land as an allocated site. It is noted that Policy MA3 land is unique in the context of other committed sites in Central Bedfordshire given that the development of this site is not secured by both an existing allocation and/or an extant planning permission, but it does make a substantial contribution to meeting the requirement for meeting the Council's housing need of 23,138 dwellings over the plan period.

The Policy MA3 site is located within Area C identified as a potential location for growth in the emerging Local Plan.

The importance of Area C is recognised by its inclusion within the Cambridge – Milton Keynes – Oxford Corridor. The corridor is subject to consideration by the National Infrastructure Commission (NIC) study which published its interim report in November 2016. The NIC study aims to consider the proposals and options to maximise the potential of the corridor as a single, knowledge-intensive cluster *“that competes on a global stage, protecting the area's high quality environment, and securing the homes and jobs that the area needs”*. As part of the Cambridge – Milton Keynes – Oxford Corridor, Area C is subject to a range of nationally significant transport investment priorities including the delivery of the East West Rail Western Section (Oxford to Bedford) and the proposed Oxford-Cambridge Expressway. Other planned and committed investment in infrastructure of national significance in Area C includes planned improvements to the A428 / A421 / A1 at the Black Cat roundabout, a new railway station at Wixams Main Settlement and the delivery of the Bedford and Milton Keynes Waterway

The findings of the NIC Interim report are clear that to maximise the benefits of significant new infrastructure investment, local stakeholders will need to demonstrate collective strategic leadership. If taken forwards as part of a wider strategy for planning and housing, new investment in transport infrastructure within the corridor has the potential to *“better link homes to employment, opening both major strategic sites and smaller local sites for high quality housing development”* and *“co-ordinate patterns of new development, creating focused opportunities to build new communities around transport hubs and interchanges”*. The findings of the NIC Interim report recognise that the strategic investment in transport infrastructure in the Cambridge – Milton Keynes – Oxford Corridor is a *“once in a lifetime”* opportunity to establish a collective strategy to deliver new homes where the value of this investment can be maximised.

The existing Policy MA3 allocation and the SA for the emerging Local Plan recognises the sustainability the area to the south of Wixams Main Settlement as a growth location. The SA clearly indicates that 'Area C East/West Corridor' within which the Policy MA3 land is located is the best performing location when considered against the SA Objectives identified for the emerging Local Plan.

O&H Recommendation: O&H recommend that CBC act to provide certainty to the delivery of development from the existing Policy MA3 allocation by including a site-specific policy to this effect within the emerging Local Plan. This approach would also demonstrate a strong commitment to the early delivery of development within Area C to reflect the findings of the NIC Interim Report. This policy should include the allocation of additional land to the west of the Land South of Wixams site (as shown on the enclosed Site Location Plan (and included within O&H's April 2016 Call for Sites submission) and reflect the opportunity for the development of an additional circa 130 dwellings and new strategic open space in this location.



3. Delivery of the Policy MA3 land

The restriction on the timing of development in Policy MA3 should be removed in a new Policy in this plan.

Policy MA3 allocates this site for mixed use development comprising 1,000+ dwellings, a minimum of 5ha of employment land and other uses. Policy MA3 indicates that development of this site will not commence before 2021 unless determined otherwise by the Council as a result of its annual monitoring process.

O&H are committed to the development of the Policy MA3 site. The site is available for development immediately and is in a suitable location for development.

The Detailed Site Schedule within the *Housing Trajectory for Central Bedfordshire* (July 2017), indicates that the Policy MA3 site will not contribute to CBC's five-year housing land supply during the five-year period 2017-2023. The trajectory indicates that the site will provide 50 dwellings from 2022/23 and a total of 1,000 during the emerging Local Plan period. CBC's *Five Year Land Supply Statement* for the five-year period commencing 1st July 2017 indicates that the Council has a demonstrable supply of 5.75 years.

Without the restriction on the timing of development established in Policy MA3, O&H consider that the site could make a significant contribution to boosting the supply of housing in Central Bedfordshire. Without the timing constraint, it is realistic that the commencement of the development of the Land South of Wixams site would be within the five-year period 2017-23. This would substantially increase CBC's housing land supply and would add depth and robustness to the Council's five-year housing land supply position.

O&H also note the context of the outline planning application submitted for the emerging Land South of Wixams site to the south. O&H are keen that the proposals for the MA3 site can be brought forward to align with the timeframe for the development of this site. Coordinating the timing of development of both sites can ensure that a comprehensive vision for development in this location can be achieved to reflect the aspirations of the adopted Wixam Park Master Plan. This includes establishing a coordinated plan for the delivery of the necessary infrastructure and facilities to support the development of both sites.

O&H Recommendation: As set out above, O&H recommend that a site-specific policy securing the allocation of Policy MA3 is included within the emerging Local Plan. This policy should not include any restriction which would limit the development of this site before 2021. The provision of a new policy without this restriction is likely to enable O&H to bring forward the development of this site so that it contributes to CBC's five-year supply of housing.

4. East West Rail

O&H strongly support the delivery of East West Rail and acknowledge the significant economic and social benefits which the project can deliver. In particular, the project will provide reduced journey times for rail users and will deliver better connections between major service centres including Oxford, Milton Keynes and Cambridge.



Network Rail has made substantial progress in developing its plans for the works required for the completion of East West Rail Western Section Phase 2 between Bletchley and Bedford.

O&H note that the *Development gain and economic benefit from East West Rail* study (July 2017) presented as part of the evidence base for the emerging Local Plan is clear that *“the specific infrastructure proposals do not represent committed investments at this point....”*. However, O&H strongly object to the Wixams Scenario 2 considered within the study. The plan provided to illustrate this scenario indicates that a new East West Rail line would extend from a new interchange station at Stewartby. The alignment of this route would cross the existing Policy MA3 allocation. Indicatively, this alignment would suggest that new railway infrastructure would extend across the permitted Wixams Main Settlement. This alignment would clearly have a substantial impact on occupied and planned dwellings at Wixams Main Settlement. This route is not considered to be realistic or deliverable.

Wixams Scenario 2 conflicts with the focus of works suggested by Network Rail as part of recent Western Section Phase 2 consultation. A preference for this scenario would mean that a substantial part of any investment made by Network Rail that is consistent with the current approach to delivering East West Rail Western Section Phase 2 (as presented for the recent consultation) would be abortive.

Wixams Scenario 2 would also effectively result in East West Rail bypassing Bedford. This would conflict with the intention of the project.

O&H Recommendation: O&H consider that Wixams Scenario 2 has no credibility as a viable option for investment in new rail infrastructure and should be discounted from any further consideration as part of the emerging Local Plan.

5. Draft Policy EMP2: Employment Sites and Uses

O&H welcome the flexibility established by Policy EMP2 for the delivery of employment sites and uses. In relation to allocations for employment uses, this policy should allow for proposals for a range of non B1, B2 and B8 uses to come forward in appropriate circumstances.

O&H Recommendation: O&H consider that the policy should provide clarity on the required scope of active marketing which must be provided to support an application for non B1, B2 and B8 employment uses.

6. Draft Policy EMP3: Change of Use to Non-Employment Generating Uses

O&H acknowledge the importance of retaining a healthy supply of employment land. However, O&H fully support the flexibility established within Draft Policy EMP3 which sets out the circumstances within which the Council would allow for allocated employment land to be developed for non-employment generating uses. This policy reflects the Council's recent positive approach to permitting applications for the development of employment allocations for residential use. In adopting this approach, the Council has recognised that it is important that the allocation of employment land is responsive to market demand and conditions. The flexibility established by the policy also reflects the Council's emerging approach to ensuring new employment development is at the most well connected locations supported by strategic transportation infrastructure.



Draft Policy EMP3 is considered to be a vital element of the emerging Local Plan to ensure that the requirements of National Planning Policy Framework paragraph 22 which indicates that:

“Planning policies should avoid the long term protection of sites allocated for employment use where there is no realistic prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities”.

However, O&H consider that further clarity should be provided in policy EMP3 to determine the circumstances where the potential shift to non-employment generating uses may be appropriate.

O&H Recommendation: It should be clarified whether non-employment generating uses will only be considered after planning permission has been granted and the relevant marketing of the employment land has taken place, or if a case could be submitted at the planning application stage in respect of allocated employment land, responding to the criteria in Policy EMP3.

We trust that the comments made within this representation are helpful and will be given due consideration. O&H are committed to continuing to engage with the Council to bring forward the emerging Local Plan. O&H's comments in relation to its land holdings at the Policy MA3 site are intended to ensure that the emerging Local Plan, its policies, strategy, and evidence base is robust for examination. O&H generally support the Council's strategy in relation to a continued reliance upon delivery from committed sites including the Policy MA3 site and the Land South of Wixams growth location.

If you have any queries in relation to this representation, please don't hesitate to contact me.

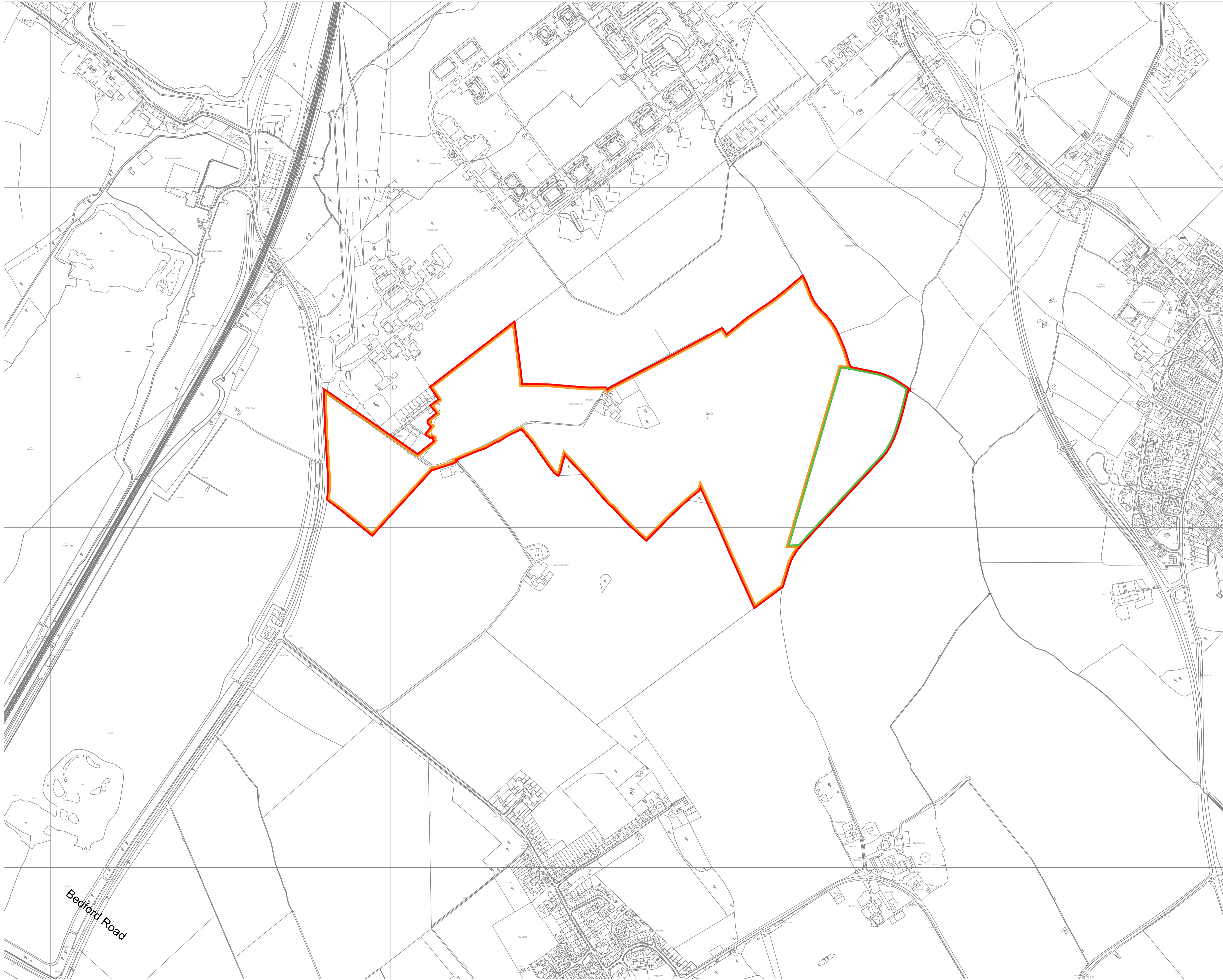
Yours faithfully

HARRY JONES
Principal Planner

email: hjones@davidlock.com

cc Pippa Cheetham, O&H Properties Limited

encl. OHB025/055 – Policy MA3 Plus Additional Land Red Line Plan



- KEY:**
- Land to be Allocated in the Emerging Local Plan - 67.77ha
 - Policy MA3 Land - 59.30ha
 - Additional Land to Provide c.130 Dwellings - 8.47ha

NOTE
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Central Bedfordshire Call for Sites
Policy MA3 Plus Additional Land
Red Line Plan

Date: 23.08.17 Scale: 1:5000 @ A1

Drawn	Designed	Approved	Drawing Number
ADW	SC	SC	OHB0251055



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