

**CENTRAL BEDFORDSHIRE LOCAL PLAN 2035
PRE-SUBMISSION CONSULTATION – REGULATION 19**

**REPRESENTATIONS ON BEHALF OF ARLESEY TOWN COUNCIL IN RESPECT
OF PROPOSED STRATEGIC ALLOCATION SA3: EAST OF ARLESEY**

1. INTRODUCTION

- 1.1 J & J Design have been engaged by Arlesey Town Council to challenge the draft strategic allocation SA3: East of Arlesey for a housing-led development consisting of up to 2000 dwellings and a country park.
- 1.2 The proposed allocation appears to follow a Concept Masterplan provided by Bidwells, covering 205.33ha area in total of which 108.21ha is considered to be developable and 97.12ha is proposed country park and public open space. The proposed allocation site is situated to the east of Arlesey on currently undesignated greenfield land between Arlesey and Fairfield Park. The allocation in effect amounts to a southern extension of the existing commitment known as Arlesey Cross.
- 1.3 The representations raise issues including:
- a. The soundness of the spatial strategy;
 - b. Whether the level of further growth directed to Arlesey is compatible with the designation as a Minor Service Centre?
 - c. Whether the A507 has adequate capacity to serve the proposed growth at Arlesey and adjoining settlements?
 - d. Whether the proposed allocation site is sound having due regard to the spatial objectives of the emerging Local Plan?
- 1.4 It is concluded that the draft allocation fails the soundness tests at paragraph 182 of the Framework, being unjustified and ineffective as well as inconsistent with national policy. Accordingly, the proposed allocation should be deleted from the Local Plan.

2. THE PROPOSED ALLOCATION

- 2.1 The proposed strategic allocation site reference SA3 is identified on the Proposals Maps for a housing-led development consisting of up to 2000 dwellings and a country park.
- 2.2 The proposed allocation arises from Representations NLP251 and NLP419 in response to the 2016 Call for Sites, together with further submissions dated 29th August 2017 from Bidwells on behalf of Axiom Developments Ltd
- 2.3 The proposed allocation site is for the most part bounded by the parish boundary and Fairfield Park development to the east, and an open field boundary south of the flooded quarry known as the Blue Lagoon on the south. To the west the site is bounded by existing residential development from Lymans Road and Hillary Rise, south to London Row Arlesey and the Arlesey Town Football Club together with undeveloped frontage to Hitchin Road. The northern boundary is formed by an existing public footpath extending from Lymans Road Arlesey towards the A507 Stotfold bypass and thence to Shawmer Farm Hitchin Road Stotfold. This is the southern boundary of the existing committed site under Policy MA8 and current planning application CB/17/01158/OUT.
- 2.4 The proposed allocation site is currently open arable agricultural land, with the exception of the former quarries known as The Green Lagoon and The Blue Lagoon.

2.5 The proposed allocation site has no previous planning history other than West Drive which formed part of the Fairfield Hospital redevelopment site and proposed recreational development at the Blue Lagoon in 1984-1994.

3. PLANNING POLICY HISTORY

3.1 Arlesey lies in the former area of Mid Bedfordshire, where the extant adopted development plan comprises:

- Central Bedfordshire Core Strategy and Development Management Policies (2009); and
- Central Bedfordshire (North) Site Allocations DPD (2011)
- Arlesey Neighbourhood Plan 2016-2031

3.2 In 2005, prior to local government reorganisation. Luton Borough Council, South Bedfordshire District Council and Bedfordshire County Council promoted a Joint Luton and South Bedfordshire LDF to cover the whole of Luton and South Bedfordshire. The Joint Core Strategy (JCS) was submitted for examination in March 2011 but withdrawn in July 2011.

3.3 Subsequent upon the local government reorganisation in April 2009 when the former Mid Bedfordshire District Council merged with South Bedfordshire District Council to form the unitary authority Central Bedfordshire and the withdrawal of the JCS, the Council promoted a draft Development Strategy for Central Bedfordshire 2014. Following initial hearing sessions in 2015, the Inspector concluded that the Council had failed to comply with the Duty to Co-operate. After litigation, the submitted Development Strategy was formally withdrawn in November 2015.

3.4 Core Strategy and Development Management Policies

3.4.1 The Core Strategy and Development Management Policies DPD (CSDMP) superseded the Mid Bedfordshire Local Plan (First Review) which was adopted in 2005. The CSDMP was prepared in general conformity with:

- The East of England Plan;
- The Milton Keynes & South Midlands Sub-Regional Strategy; and
- The South East Plan.

All these regional and sub-regional documents have been revoked.

3.4.2 The broad approach to accommodating the development requirements in 2009 was:

- *To focus most new development in the larger settlements with best range of services and access to public transport*
- *To use a Settlement Hierarchy as the basis for apportioning growth but without excluding possibilities for larger-scale growth where there are sound sustainability benefits*
- *To seek opportunities to concentrate growth in one or two key locations*
- *To ensure new development has a positive impact on communities*
- *To protect and maintain the existing Green Belt*
- *To use previously developed land wherever possible when it is sustainably located*
- *To allow more limited new development in the rural areas to serve local needs and help support local services*

- 3.4.3 The Council set out a hierarchy of settlements, taking account of local sustainability credentials such as access to services and facilities (schools, shops and public transport links), based on the then current level of provision. The hierarchy was set out in Policy CS1.
- 3.4.4 Arlesey was one of two settlements identified as having potential for sustainable growth beyond that which would be expected from their position in the Settlement Hierarchy.
- 3.4.5 Policy CS1 : Development Strategy identified the following growth areas:
- Northern Marston Vale
 - Milton Keynes Growth Area
 - Ivel Valley

3.4.6 Within the Ivel Valley Policy CS1 included the following:

Arlesey/Stotfold/Fairfield Park

Comprehensive planning will ensure these three settlements remain separate entities but support higher-level services commensurate with their combined population, including a broader range of shops, services and larger-scale business provision. A development framework will be developed to guide development in the area.

- ***Arlesey – Minor Service Centre***
Arlesey will grow to bring forward large-scale new mixed-use development, including significant improvements in levels of service and local traffic conditions, together with substantial areas of new, publicly accessible green infrastructure.
- ***Stotfold – Minor Service Centre***
Additional shops and services will be provided at Stotfold as part of the existing committed housing site and through new mixed-use development on the western side of the town, incorporating the proposed leisure centre, a new supermarket and “town square”.
- ***Fairfield Park – Small Village***
Fairfield Park will be maintained within its existing defined boundaries. Additional physical links will enable access to new green infrastructure and local facilities at Arlesey and Stotfold.

3.4.7 CSDMP Section 3.16 articulated the Context, Vision and Infrastructure requirements for Arlesey, Stotfold and Fairfield Park. This highlighted the following key areas of concern:

- Growth of Arlesey and Stotfold by over 70% by 2011, and continuing up to 2021 and beyond.
- Arlesey, Stotfold and Fairfield Park have relatively poor levels of local service provision. Neither of the towns has a defined town centre and both communities look to the North Hertfordshire towns of Baldock, Letchworth and Hitchin for service and shopping needs.
- Housing growth in these communities has not been matched by employment growth, resulting in high levels of out-commuting.

- 3.4.8 The Infrastructure requirements (see paragraph 3.16.10) were identified including:
- Improved links between the three settlements; primarily walking and cycling routes to enable convenient access to key services and the railway station, without the need to travel by car.
 - An improved quality bus service.
 - Improvements to A1(M) Junction 10 and key junctions on A507.
- 3.4.9 In terms of green infrastructure, CSDMP (paragraph 3.16.14) acknowledged the Blue and Green Lagoons as an opportunity to provide for a new country park. However, it was stated **“the Council will not support large-scale development to bring this forward given that it would lie a significant distance from local facilities”** [my emphasis].
- 3.4.10 Section 3.17 of CSDMP focused on Arlesey itself. Key issues included:
- Local congestion and an environment which discourages walking and cycling.
 - Limited local facilities spread out through the village [sic].
 - Steady growth through piecemeal redevelopment, without new facilities and services in the town.
 - The key challenge to improve the level of local facilities together with new employment facilities.
 - Development to be accompanied by substantial areas of new, publicly accessible green infrastructure, to also act as **“strategic landscaping and open space to ensure the separate identity of Arlesey, Stotfold and Fairfield Park in the long-term”** [my emphasis].

3.5 Site Allocations DPD

- 3.5.1 The Site Allocations DPD (SADPD) was adopted in April 2011 and identified sites and policies to help deliver the spatial vision, objectives and policies of the CSDMP. In accordance with the ‘parent’ CSDMP the SADPD was limited to Central Bedfordshire (North) ie. the former MBDC area.
- 3.5.2 Section 8 of SADPD reiterated CSDMP Policy CS1 and the Settlement Hierarchy. Table 1 provided a summary of the Housing and Employment Land Requirements.
- 3.5.3 Section 11.11 of SADPD set out the vision for Arlesey, together with Policy MA8 : Land at Chase Farm and land West and North-East of High Street Arlesey. This was allocated for a mixed-use development comprising a minimum of 1000 dwellings and 10ha of employment land. Key elements in the local requirements included:
- A Masterplan to guide the mixed-use development.
 - Provision of a relief road running north to the west of High Street to the north-east of Arlesey to join A507.
 - Provision of a town centre with a supermarket, retail units and other community facilities including relocation of the GP, a new pharmacy and dentist.
 - Provision of substantial areas of strategic, publicly accessible green infrastructure aimed in part at maintaining separation between Arlesey, Stotfold and Fairfield Park through long-term landscaping.

3.6 Arlesey Neighbourhood Plan

3.6.1 The Arlesey Neighbourhood Plan (ANP) submission version (Regulation 16) was published in November 2016. A public referendum was held on Thursday 30th November 2017 and the majority voted 'Yes' to the Neighbourhood Plan.

3.6.2 Central Bedfordshire Council acted under delegated powers to 'make' the plan on 12th January 2018.

3.6.3 The Arlesey Neighbourhood Plan covers the period 2016-2031. Paragraph 1.3 of the ANP recognises that during the early part of the period, CBC will have a new Local Plan and it is confirmed that the ANP will be reviewed once the new Local Plan is in place.

3.6.4 The Report of the Examination of the Arlesey Neighbourhood Plan¹ records that Policy MA8 of the adopted SADPD allocates land around Arlesey for a mixed use development (known as Arlesey Cross) including a minimum of 1000 dwellings. A Masterplan has been prepared and adopted by CBC as technical guidance for Development Management purposes, showing the development of the land in diagrammatic form. The Examiner continued to report that:

3.4.7 The land allocated at Arlesey Cross is clearly far more than is required to meet local housing needs likely to arise in the Parish during the NP period (see ANP pages 26-28).

*3.4.8 The recently published DCBLP identifies land east of Arlesey as one of a number of possible locations for future housing development. The DCBLP says that subject to further assessment of sustainability and deliverability, new development will be planned for a **selection** [his emphasis] of those locations.*

3.4.9 The emerging Local Plan is at a very early stage and there is not sufficient evidence before me to support the conclusion that further development in or around Arlesey (beyond that already committed at Arlesey Cross) is inevitable. It is not safe or reasonable to assume that Arlesey will be one of the locations selected for future residential development, beyond that which is already committed. I deal further with this matter in section 5 below.

3.6.5 The Vision for Arlesey set out in the ANP is as follows:

To develop a town with the heart of a village.

In 2031, Arlesey will be a place where people aspire to live. The Arlesey Cross development will be fully integrated with the existing community and the identity of the Parish as a whole will be strengthened.

There will be further opportunities to take part in community activities and a range of local jobs will be available for those not wishing to commute out. Those who have grown up in Arlesey will be able to afford to stay in the Parish if they so wish; equally there will be opportunities for older members of the community to downsize while remaining in the area that they think of as home.

The attractive rural setting that Arlesey benefits from will have been safeguarded for future generations, along with the historic assets that have

¹ Brian Dodd BA MPhil MRTPI – Independent Examiner – 7th September 2017

helped to form the community today. Sustainable transport modes will be emphasised with a focus on pedestrians and cyclists. Traffic flow will be managed to minimise its impact and congestion as a result of on-street car parking will be significantly reduced.

A range of excellent public services across education, healthcare, play and leisure will be available for all residents.

3.6.6 The principles underpinning the Vision are:

Plan for the future

Address short term issues while maintaining a long term view

Build on our community spirit

Maximise engagement, minimise estrangement

Showcase Arlesey

Develop a place where people aspire to live

Leave a legacy

Plan for the future generations

3.6.7 The priorities are as follows:

Address traffic issues

Protect the countryside and our rural environment

Protect our heritage

Retain and enhance key services

Build an infrastructure to promote community activities

Strengthen the local economy

3.6.8 The ANP Policy ARL1 : Settlement Boundary provides:

The development of Arlesey shall be focused within the settlement boundary as identified in the Proposals Map. Development proposals will be supported within the settlement boundary subject to compliance with other policies in the development plan.

Development proposals outside the settlement boundary will not be permitted unless:

- *They are in accordance with the Central Bedfordshire Core Strategy policies in respect of appropriate uses in the countryside; or*
- *They relate to necessary utilities infrastructure and where no reasonable alternative location is available; or*
- *They relate to the Arlesey Cross Masterplan (Policy MA8 of Site Allocations DPD).*

The settlement boundary is drawn to enclose existing built environment, together with the allocation sites between the East Coast Mainline railway and High Street and at Chase Farm. The ANP does not address wider development proposals to the east of the town.

Non Statutory Planning Documents

3.7 Arlesey Cross Masterplan Document

3.7.1 The Arlesey Cross Masterplan was prepared by Hankinson Duckett Associates and Woods Hardwick Planning Ltd in collaboration with Central Bedfordshire Council. It was subject to public consultation between 9th November and 16th December 2013. The Masterplan document has been considered by Central Bedfordshire Council and subsequently approved in March 2014 as technical guidance for Development Management purposes. It informs the future detailed Masterplanning of the site and provides a framework within which development proposals will be prepared.

3.7.2 The Arlesey Cross Masterplan Document (ACMD) seeks to demonstrate, at a high level, how the allocated land can be comprehensively masterplanned to deliver a co-ordinated development accommodating the land uses identified by Policy MA8.

3.7.3 It should be noted, however, that the Pre-Submission Local Plan Appendix 4 undermines the Policy MA8 and Masterplan objectives of securing 10ha if employment land. As identified in the 2016 Employment Land Review the following local employment sites will be considered favourably for alternative (Non Employment) uses:

- Hampden House Arlesey
- Land East of Arlesey (Chase Farm) as identified by Policy MA8 of the Central Bedfordshire (North) : Site Allocations DPD

3.8 Arlesey and Stotfold Local Area Transport Plan

3.8.1 The Local Transport Plan for Central Bedfordshire covers the period April 2011 to March 2026. The overall LTP is broken down into 10 Local Area Transport Plans (LATP) which set out the key transport issues and concerns of local people.

3.8.2 The LATP for Arlesey and Stotfold was refreshed on 1st April 2013. The LATP includes Arlesey, Stotfold and the surrounding area including Clifton, Henlow, Stondon, Langford and Astwick and sets out the key transport issues and concerns of local people together with a programme of measures through which they will be addressed.

3.8.3 The LATP advises that Arlesey and Stotfold are located to the east of Central Bedfordshire with a combined population of around 27,400. As a result of future housing developments, it is envisaged that the population of the area will increase by around 40% in the period up to 2026.

3.8.4 The LATP advises that the towns are well-connected in transport terms and benefit from direct rail links to London in the south and Peterborough in the north, whilst the National Cycle Network passes through the area. The A1 provides a strategic north-south link to the east of the plan area, with the A507 catering for east-west movements, and linking the A1 to the M1 in the west of Central Bedfordshire. A large number of residents commute out of the area for employment particularly to London, Hertfordshire, and other locations within Central Bedfordshire, partly as a consequence of these good transport links.

3.8.5 The LATP recognises the commitments to the following large scale developments:

- Fairfield Park, where planning permission for development at the former Fairfield Hospital to the south of Stotfold was granted in 2002. Following the original proposals for up to 853 residential dwellings, subsequent

planning permissions have seen the total number of dwellings provided on the site increase to around 1300.

- Land south of Stotfold, where planning permission was granted in 2006 for the provision of development comprising of up to 650 dwellings together with 2.27 hectares of employment land, a neighbourhood centre, a shop and public open space.
- Arlesey urban extension, covered by Policy MA8 of the Site Allocations Document.

3.8.6 The LAMP plan area is accessible to the strategic road network via Junction 10 of the A1(M) on the eastern most edge of the area. The A1/A1(M) provides good north-south links from Arlesey and Stotfold to the rest of the region and further afield. Whilst the level of stress on the A1/A1(M) in this area is relatively low, Highways England anticipates that levels of stress on the network will increase in the period up to 2026 as a consequence of the increase in demand for travel along the corridor. Despite this, no schemes are currently planned to increase the link capacity on the A1/A1(M) in the Arlesey and Stotfold area. Junction 10 of the A1(M) is a 'grade-separated' junction, where the link is accessed via a roundabout and sliproads. There is local anecdotal evidence that this junction can be subject to delays at peak periods.

3.8.7 The A507 acts as the main link running east-west through the LAMP area, with further links on a north-south axis, providing easy movement between the various settlements. The main links to the north are provided by the A1 and the B659 (formerly the A6001) via Henlow. Key links on the local road network include:

- A507 : links the area to the A1/A1(M) and Baldock to the east, with Shefford, Flitwick and the M1 in the west.
- A600 : links the A507 in the north with Hitchin to the south, via Stondon and Henlow Camp.
- B659 (formerly A6001) : runs from Biggleswade in the north, to Langford, Henlow via the A507 to join the A600 at Henlow Camp.
- Hitchin Road Arlesey : links Arlesey to Hitchin to the south and the A507 to the north.
- Hitchin Road Stotfold : links Stotfold to the A507 and Letchworth Garden City to the south.

3.8.8 The LAMP provides the following commentary on Arlesey and Fairfield Park.

Due to the long and linear nature of Arlesey, there is no real centre or focal point for the town. The station generates the largest number of trips in the area but is poorly served by connecting public transport services, which partly contributes to the parking pressures in the vicinity.

Concerns also relate to parking issues in and around the school and the prevalence of HGVs. The ability of the town to embrace future growth is the key to its long-term sustainability and there are worries that the capacity of the existing transport network is insufficient to meet future demand.

The following priorities are identified at Figure 7.1:

- *The station generates significant volumes of trips, the majority of which are car-based.*
- *East Coast Mainline forms a barrier to pedestrian and cycle movements and residents ability to access open space beyond.*
- *Sustainable access to Etonbury School is a challenge, given its out-of-town location.*

- *Proposed urban extension to the east and west of Arlesey will generate a significant increase in the demand to travel and efforts need to be taken to mitigate the impact on existing links.*
- *Narrow footpaths and the prevalence of HGVs result in parents not wishing to allow their children to walk to school, increased parking at the school gates and congestion on the main road through the town.*
- *The volume of freight through the centre of Arlesey, accessing the landfill site is of concern to local residents.*
- *Potential for improved pedestrian, cycle and bus links between Arlesey and Fairfield Park.*

4. BACKGROUND EVIDENCE

4.1 The following background documents have informed this representation:

- a. The Mid Bedfordshire Local Plan : First Review Deposit Draft Inspectors Report – September 2002;
- b. Report of the Examination into the Mid Bedfordshire Core Strategy and Development Management Policies DPD – 18th September 2009;
- c. Report on the Examination into the Central Bedfordshire (North) Site Allocations DPD – 24th January 2011;
- d. Partnering for Prosperity : A new deal for the Cambridge - Milton Keynes – Oxford Arc : NIC : 2017;
- e. Central Bedfordshire Council : Settlements Capacity : Initial Study : July 2017 : Enfusion;
- f. Central Bedfordshire Local Plan 2015-2035 : Draft Plan : July 2017;
- g. Central Bedfordshire Council Local Plan (2015-2035) Transport Modelling, Stages B, 1C & 1D and 2A (January 2018) : AECOM;
- h. North Central Bedfordshire Growth Options Study : July 2017 : Land Use Consultants including Appendices 1-5;
- i. Central Bedfordshire Council Local Plan (2015-2035) Sustainability Appraisal : Non-Technical Summary : January 2018 : Enfusion;
- j. Central Bedfordshire Proposed Submission Policies Map.

5. PLANNING ISSUES

5.1 The following key issues have been identified:

- a. The soundness of the spatial strategy;
- b. Whether the level of further growth directed to Arlesey is compatible with the designation as a Minor Service Centre?
- c. Whether the A507 has adequate capacity to serve the proposed growth at Arlesey and adjoining settlements?
- d. Whether the proposed allocation site is sound having due regard to the spatial objectives of the emerging Local Plan?

5.2 Each of these issues will be considered in turn.

6. PLANNING CONSIDERATIONS

6.1 The soundness of the spatial strategy

6.1.1 The spatial strategy proposed by the Council is set out at chapter 5 of the Pre-Submission Local Plan. This includes the key spatial objectives and a balanced strategy. The Growth Strategy is summarised at Policy SP1 : Growth Strategy which identifies East of Arlesey (Town Extension) – 2000 homes.

- 6.1.2 The respondents note and accept the influence of the surrounding major centres; including London, Milton Keynes, Luton and the emerging strategic corridor of the Cambridge – Milton Keynes – Oxford Arc.
- 6.1.3 The respondents are also aware of the major housing needs arising from both the Dunstable and Houghton Regis conurbation and Luton’s unmet needs. They support the need for sustainable urban extensions to the primary urban areas, to develop additional growth opportunities around transport hubs and other strategic growth opportunities. However, for the most part north Central Bedfordshire lies outside the Luton HMA and this is particularly the case in respect of the A1 corridor – Area B.
- 6.1.4 The key spatial objectives identified at Section 5.2 of the Pre-Submission Local Plan include:
- *To grow existing communities across Central Bedfordshire, **proportionate to their scale and environmental context**, so that they are more sustainable through improved services, facilities and employment opportunities, leading to reduced travelling and outflows.*
 - *To develop additional growth opportunities around existing and committed transport hubs, through urban intensification, and on previously developed land Central Bedfordshire’s good access to strategic transport routes creates potential for higher density and more sustainable growth around existing key hubs.*
 - *To develop current strategic growth opportunities with good potential for a more sustainable development to a level **which can be supported by existing and committed strategic infrastructure** together with developer and public funding. This would include for example Marston Vale and **East of Arlesey**.*
[my emphasis]
- 6.1.5 It is considered that the spatial strategy approach (Section 5.4 of the Pre-Submission LP) cannot be regarded as sound in respect of the housing need **“close to key transport corridors”** (east-west, A1/East Coast Mainline and M1/Thameslink) including funding until and unless the necessary infrastructure, particularly in respect of the strategic and local road network has been committed within timescales commensurate with the emerging Local Plan proposals.
- 6.1.6 Arlesey Town Council have particular concerns at the levels of growth proposed for existing communities and whether these are really proportionate to their scale and environmental context. Furthermore, the spatial strategy should recognise and address the existing shortcomings in the strategic transport network. Arlesey Town Council further challenge the apparent assumption that current strategic growth opportunities and commitments should continue at existing locations including East of Arlesey.
- 6.1.7 Strategic planning in the former county of Bedfordshire has always been challenged by the relevant balance between the extent to which growth should be directed to the north, which is less constrained by Green Belt, compared to the south of the area which supports the largest settlements. Increasingly, strategic planning has looked to the principal transport corridors as areas for growth. The Inspector’s Report into the MBDC Local Plan Review 2002 included examination of the following issues:
- Clarity of the strategy for MBDC;
 - Imbalance between housing provision in South-West Beds corridor and East Beds strategic corridor.

Arlesey Town Council consider that similar issues need to be examined and carefully addressed in respect of this Local Plan.

- 6.1.8 The Sustainability Appraisal Non-Technical Summary (SA) sets out reasonable alternatives which were considered and appraised through the SA process in an iterative and ongoing way to enable the SA to inform each stage of plan-making and the development of the Pre-Submission Local Plan.
- 6.1.9 The SA considers that Area B is well served with regard to transport north-south and east-west with the delivery of the central section with the east-west rail and the expressway. The SA identifies the following issues and potential key negative effects:
- *It will be important that the transport corridor here is maintained and improved to support additional growth.*
 - *The effect of the growth on settlements will depend on the scale and design of the development proposed.*
 - *Potential for negative effects on the predominantly rural landscape. These could be cumulative and residual effects will depend on the scale and scope of the development and how the potential effects are mitigated.*
 - *Increased development in this area will result in loss of soil resources.*
- 6.1.10 The SA goes on to consider five alternative growth scenarios. It is to be noted that the proposed allocation for 2000 dwellings east of Arlesey features in each scenario, irrespective of the relative levels of growth in each of the sub-areas. This strongly suggests a pre-determination that further growth East of Arlesey would be included in the Local Plan irrespective of the relative merits of the alternative strategies considered.
- 6.1.11 Arlesey Town Council considers that the spatial strategy is unsound and that no reasonable alternative to the proposed allocation East of Arlesey has been considered during the preparation of the LP. Accordingly, Policy SP1 : Growth Strategy should be revised to omit the land East of Arlesey.
- 6.2 Whether the level of further growth directed to Arlesey is compatible with the designation as a Minor Service Centre?**
- 6.2.1 The settlement hierarchy is set out at Chapter 9 of the LP and takes account of local sustainability credentials. Four tiers are included – major service centres, minor service centres, large villages and small villages.
- 6.2.2 The broad approach to the settlement hierarchy has been adopted by Central Bedfordshire in the extant Core Strategy at Policy CS1 : Development Strategy. Arlesey is identified there as a Minor Service Centre and it is proposed that this designation should be carried forward into the CBC Local Plan 2035.
- 6.2.3 Whilst the Framework does not require the identification of a settlement hierarchy, it can enable the LP to take account of the different roles and character of different areas, promoting the vitality of main urban areas and supporting thriving rural communities. It can also assist in ensuring that development is appropriate in scale and character to the features of individual settlements. Given the diversity of settlements in Central Bedfordshire, it is considered that the principle of a hierarchy is justified, particularly as this broad approach has served well in the past.
- 6.2.4 In the Inspector's Report on the MBDC Local Plan Review (2002) the Inspector confirmed that Arlesey and Stotfold should be identified as 'Selected Settlements', with major development allocations to the south of Stotfold, together with the

redevelopment and associated housing development at Fairfield Hospital. At Arlesey, the Inspector recommended an additional modest housing site for 60 dwellings west of High Street and south of Cricketers Road.

6.2.5 In the subsequent report on the Examination of the Mid Bedfordshire Core Strategy and Development Management Policies DPD (now CSDMP) the Inspector considered the overall spatial strategy and drew attention to “*some contradictions between the individual points*” and in particular, the proportions of development attributed to Arlesey and Silsoe which did not accord with their position in the settlement hierarchy. In the case of Arlesey he observed “*the scale of development at Arlesey accords with option 4 ...*”². He concluded that the overall approach was sound.

6.2.6 Turning then to the Ivel Valley issues, the Inspector identified the following issues relevant to Arlesey and adjoining settlements:

- (iii) the justification for the allocation of 1000 plus additional dwellings in Arlesey, including the provision of a relief road;*
- (iv) whether the three settlements [Arlesey/Stotfold/Fairfield Park] are likely to function in a polycentric way, particularly in terms of the location of any new retail/commercial centre;*

6.2.7 In respect of issue (iii), the Inspector stated:

*“I consider that the analysis of the planning problems faced in Arlesey with a fragmented linear form, lack of a strong central focus and traffic issues gives a good justification for the promotion of a sufficient scale of development to create the ‘critical mass’ for improved sustainability. I am not convinced that the situation in other settlements presents similar problems, certainly not such as to lead to a conclusion that the whole strategy is unsound.”*³

He concluded:

*“I also consider that the indication in the vision at 3.17.5 that large-scale mixed use development will be focused on the northern part of the town is sufficiently justified and is an adequate level of specificity for a Core Strategy. It does not preclude the consideration of sites in other parts of the town through the Site Allocations DPD provided sustainability criteria can be met.”*⁴

6.2.8 In considering issue (iv), the Inspector commented:

*“The main barrier to movement between Stotfold and Arlesey is the A507. However, I accept that the focus of development to the north of Arlesey is to be linked to development to the west of Stotfold and Etonbury Middle School by a cycleway underpass link which will strengthen ties. The railway station to the north of Arlesey close to the A507 is an important asset. As stated in paragraph 3.6.11 of the DPD developer funding will assist in improving pedestrian and cycle links and to enhance local bus services.”*⁵

² Report on the Examination of the Mid Bedfordshire Core Strategy & Development Management Policies DPD (2009) – Paragraph 3.8

³ Ibid paragraph 3.50

⁴ Ibid paragraph 3.52

⁵ Ibid paragraph 3.54

6.2.9 The Inspector concluded:

“In conclusion, I find that the proposal to provide for the expansion of Arlesey by over 1000 new dwellings with the associated improvements in infrastructural provision to be well justified, albeit as an exception to a strictly hierarchical approach to the settlement strategy. The strategy is sound and I do not propose any changes to Section 3.13-3.18 of the DPD covering the settlements in the Ivel Valley.”⁶

6.2.10 The issue now arising is whether it is justified and sound planning to propose a further 2000 dwellings together with new employment at the Minor Service Centre of Arlesey, as a further exception to the hierarchical approach to the settlement strategy. Arlesey Town Council note that no other Minor Service Centre in Central Bedfordshire has been selected for strategic growth on this scale. Furthermore, the Town Council have seen no clear, sound justification for further growth in excess of the committed growth from the CSDMP which has yet to be implemented, including the proposed eastern relief road linking Arlesey High Street to A507. Arlesey Town Council submit that this large scale commitment should be completed and allowed to mature in order to assess the effects on the local and strategic road network together with adjoining settlements prior to any reassessment of the position of Arlesey in the settlement hierarchy which it is considered is a pre-requisite to large scale growth. For all these reasons, Arlesey Town Council are firmly of the view that the proposed allocation of further strategic growth at Arlesey is unsound and unjustified and incompatible with the designation as a Minor Service Centre.

6.3 Whether the A507 has adequate capacity to serve the proposed growth at Arlesey and adjoining settlements?

6.3.1 The Pre-Submission Draft Local Plan makes a number of references to the A507, which currently serves as the primary east-west road in north Central Bedfordshire connecting A1(M) at Junction 10 to M1 at Junction 13. However, these references appear to be inconsistent and contradictory. The key references appear to be:

- Paragraph 6.5.3

The Sustainability Appraisal and the transport modelling evidence tells us that there is limited scope for residential growth in this area due to limited capacity on the network, particularly along the A507 as a result of incremental growth of existing settlements.

- Policy SA3 : East of Arlesey

10. It is essential that the development provides an appropriately designed Relief Road to connect the area from the south of Hitchin Road to the A507/High Street link road in the north being proposed as part of Arlesey Cross. This will allow for access directly onto A507 relieving congestion along the High Street in Arlesey.

- Paragraph 12.1.6

Central Bedfordshire benefits significantly from good transportation access. The M1 and A1 corridors run north to south through Central Bedfordshire, which provide businesses with direct access to London and the strategic road network, whilst the A5, A6, A507 and the A421 create a robust internal transportation network providing local residents with access to employment opportunities across the whole area.

⁶ Report on the Examination of the Mid Bedfordshire Core Strategy & Development Management Policies DPD (2009) – Paragraph 3.58

- Paragraph 14.1.1

Central Bedfordshire is well served by strategic north-south road links, notably the M1, A1, A6 and A5, and east-west links in the form of the A421, A505 and A507, which provide connections between the A1 in the east and the M1 in the west.

6.3.2 Local experience together with the CBC transport modelling would appear to confirm that paragraph 6.5.3 is the more realistic picture both currently and in the light of the proposed growth alongside the A507. The largest proposed allocations are at RAF Henlow (mixed use specialist employment) and East of Arlesey. Further village extensions at Campton, Clifton, Haynes, Henlow, Lower Stondon, Maulden, Meppershall, Shefford, Shillington and Upper Gravenhurst will also contribute to increased pressure on the road network, including critical junctions on the A507.

6.3.3 The CBC transport modelling identifies the following 'hot-spots' on the A507 and connecting routes:

6A	Hitchin Road/Arlesey New Road	Arlesey
7A	Southern Bypass	Stotfold
7B	Arlesey/Henlow/Shefford	
7C	Ampthill	
8B	Clophill/Maulden	

6.3.4 The transport modelling reports that ongoing growth both committed and planned will result in a general deterioration in network performance with extended journey times. The modelling predicts increased congestion, saturation and at capacity for the junctions at both 2025 Local Plan and 2035 Local Plan growth. Significant link stress is identified at the A507 Ampthill junction. The levels of growth proposed will have 'high impact' at locations 6A and 7A in particular. Furthermore, modelling predicts that additional capacity on A1/A1(M) is likely to cause additional stress on the A507 at A1(M) Junction 10.

6.3.5 The transport modelling report Stage 2A (January 2018) identifies the following key interventions:

- At Hitchin Road/Arlesey New Road (location 6A) - signalisation of the three way junction;
- At A507 Stotfold – construction of the new link road associated with the MA8 allocation at Arlesey Cross;
- A new bus service serving Stotfold/Arlesey Cross/Arlesey Station/Henlow Camp/Shefford.

6.3.6 In response, Arlesey Town Council respectfully point out that intervention (b) is already approved in part : east of High Street. There are significant doubts about delivery of the link road west of High Street, due to fragmented landownership and ransom strips. Furthermore, intervention (c) is needed to service the Arlesey Cross development already committed and will not serve the further proposed allocation. Moreover, local bus services have been cut back in Arlesey thereby preventing residents from the south of the village using bus services to get to the railway station and back as part of their commute to London. This gives rise to lack of confidence that improved public transport facilities will be more than a temporary arrangement.

6.3.7 Other interventions are proposed at 'hot-spots' including A6001/A507 at Henlow, A507 (Ampthill) and A6/A507 roundabout at Clophill (all indicative timescales 2025). It is respectfully submitted that these are all needed to relieve existing peak hour congestion and are unlikely to provide adequate capacity to support growth on the scale now proposed.

- 6.3.8 Highways England are currently considering a major improvement scheme for A1/A1(M), including a 'smart motorway' between M25 and A1(M) Junction 10 and a realigned motorway between Junction 10 and Buckden where A14 improvements are under construction. However, there is no preferred scheme or committed funding for these schemes. In the absence of such improvements, congestion and network performance erosion will exacerbate current problems through the plan period including the critical A507/A1(M) Junction 10.
- 6.3.9 For all these reasons, Arlesey Town Council respectfully submit that the A507 does not have adequate capacity to serve the proposed growth at Arlesey and adjoining settlements.
- 6.4 Whether the proposed allocation site is sound having due regard to the spatial objectives of the emerging Local Plan?**
- 6.4.1 The key spatial objectives of the LP are identified at paragraph 5.2. Those directly relevant to Arlesey have been identified as follows:
- To grow existing communities across Central Bedfordshire, proportionate to their scale and environmental context, so that they are more sustainable through improved services, facilities and employment opportunities, leading to reduced travelling and outflow.
 - To develop current growth opportunities, with a good potential for more sustainable development to a level which can be supported by existing and committed strategic infrastructure together with developer and public funding. This would include for example Marston Vale and East of Arlesey.
- 6.4.2 LP paragraph 2.2.3 claims that the key challenge the Plan addresses is driving more sustainable growth by improving and extending the range of economic opportunities and services available locally and screening additional infrastructure, including enhancing digital connectivity, to unlock the areas full potential and to achieve more sustainable travel.
- 6.4.3 At Section 2.5 – New Community Scale Growth the Local Plan draws attention to the existing geographical and demographic characteristics of Central Bedfordshire which limit the extent of growth which can be accommodated as infill, re-use of redundant sites, or in village or urban extensions. The Plan has identified Allocations where large scale new communities can be delivered. The key challenge addressed is the identification of sustainable locations in Central Bedfordshire where large scale new communities have the best prospects of success based on viability, deliverability, access to services and improved economic potential.
- 6.4.4 The Spatial Strategy Approach at Section 5.4 specifically includes the need for 'enhancement and protection' of existing communities, landscape, heritage and countryside and actively 'prevent the coalescence' of settlements through the identification of Important Countryside Gaps.
- 6.4.5 In the MBDC Local Plan Review 2002 the Inspector's Report was unable to support proposed development at Green Farm Arlesey, which would reduce the 1km wide gap between Arlesey and Fairfield Hospital leading to concern that they would visually if not physically coalesce. The Inspector recognised the importance of ensuring that settlements do not visually or physically coalesce.
- 6.4.6 Arlesey Town Council submit that the proposed allocation SA3 : East of Arlesey will result in visual coalescence with Fairfield Park, notwithstanding the proposed linear

country park. This would contravene sound planning objectives including spatial objectives of the LP.

6.4.7 The North Central Bedfordshire Growth Study Options (July 2017) has examined some thirty alternative locations from Salford in the west, to Stotfold in the east. The proposed allocation site corresponds with Site ID N29 Arlesey-Fairfield Park. Table 1 sets out an Assessment of findings for all locations. The following results are listed:

Site Area (ha)	292.8
Assumed density (dph)	44
Assumed total net capacity	7730
Estimated net capacity to 2035	2000
Overall deliverability	Low
Overall viability	High
Overall accessibility	Medium
No. of secondary constraints (0-16)	5
Public transport hub within 1.2km	No

6.4.8 Table 4.2 repeats these findings under the title : Performance of ‘New Settlement’ locations, again at Table 4.3 : Performance of ‘Village Extension’ locations and also at Table 4.4 : Performance of ‘Growth in Transport Corridors’ locations. CBC evidently consider that the allocation falls into each of these categories.

6.4.9 A more detailed commentary for location ID : N29 is set out in the Appendix to the Growth Options Study. This places the site within the typology : large new settlement/village extension, **not in close proximity to public transport** [my emphasis]. The more detailed analysis points out that the northernmost part of the allocation will be 1.5km from Arlesey Station, whilst the southernmost extent of the proposed site will be closer to Letchworth railway station in North Hertfordshire.

6.4.10 The analysis also draws attention to impacts on the A507 with speed reductions greater or equal to 30% near Arlesey Station and on the approach to the A507/Norton Road junction close to A1(M) Junction 10. Journey to work patterns in the area are 41% to south-east via A1 or A600, together with 21% to the west on A507. A further 14% use A507, A600 or A1 towards Bedford. Only 13% of commuters use public transport.

6.4.11 The Transport Infrastructure Investment is identified including:

	<u>Likelihood of delivery by 2035</u>
• Arlesey Relief Road	High (75%)
• A1 East of England Improvements	Medium (50%)
• A1(M) Junctions 6-8 smart motoring	High (75%)
• Interchange at Arlesey	Medium (50%)

Further ‘potential transport interventions’ are listed. These do not include improvements to A507.

6.4.12 Having regard to all this technical evidence and background studies, Arlesey Town Council have concluded that:

- a. There is no evidence that the proposed growth will deliver greater sustainability through improved services, facilities and employment opportunities, leading to reduced travelling and outflows.
- b. There is no evidence of adequate existing or committed strategic infrastructure to provide more sustainable development.

- c. In view of the content of LP Appendix 4 and the significant discrepancies between the current planning application and the policy MA8 proposals, Arlesey Town Council see little evidence that the policy SA3 proposals will deliver a mixed development with reduced travel requirements.

- 6.4.13 Rather, the Town Council submit that Allocation Site SA3 : East of Arlesey will result in unsustainable growth, leading to visual coalescence with Fairfield Park together with increased traffic congestion and an unacceptable impact on the quality of life for current and future residents of Arlesey and adjoining settlements. Furthermore, on the Council's own evidence deliverability of the allocation is low and accessibility is medium at best. For all these reasons the proposed allocation is considered to be unsound.
- 6.4.14 Arlesey Town Council accordingly request the deletion of Allocation Site SA3 : East of Arlesey from the Local Plan.
- 6.4.15 A copy of Arlesey Town Council response to the Regulation 18 consultation is annexed to this representation.

J R Shephard
February 2018