



UNIVERSAL DESTINATIONS & EXPERIENCES UK PROJECT

Former Kempston Hardwick Brickworks
and adjoining land, Bedford

Appendix 5.1 Transport Assessment Annex 1 – Policy Context

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Universal Destinations & Experiences UK Project Transport Assessment – Annex 1 – Policy Context

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Planning Policy Context

National Planning Policy

National Planning Policy Framework (NPPF), 2024

1. The National Planning Policy Framework (NPPF) (December 2024) refers to the promotion of sustainable transport, with Section 9 promoting a Vision-led approach to transport strategies supporting new development with a balance in favour of sustainable transport modes, giving people a real choice about how they travel. Paragraph 115 states that:

“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users;*
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.”*

2. The Vision-led planning approach taken in support of the Proposed Development’s transport strategy puts the onus on delivering the sustainable transport infrastructure necessary to achieve the Vision’s desired car mode share, making public transport the main modes for accessing the Proposed Development, given the expected length of most journeys, with walking and cycling available for more local journeys. The Vision captures the significant mutually beneficial opportunities that the Proposed Development and planned rail infrastructure improvements at Wixams and the safeguarding of land for a potential EWR station on the Site bring. The Proposed Development will deliver new safe walking, cycling and road infrastructure across the Site to the benefit of local communities.

3. Paragraph 110 states that:

“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”

4. The Proposed Development responds directly to this policy and the reason for choosing the Site is directly related to the fact that it is and can be made sustainable, due to its high level of accessibility at international, national, regional, and local levels.

5. Paragraph 116 states that:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”

6. The Proposed Development includes direct access/egress from/to the A421(T) from three directions – eastbound off-slip, westbound off-slip, westbound on-slip. Eastbound traffic joins the A421(T) via Marsh Leys Roundabout. Illustrative designs and layouts of these slip roads have been developed collaboratively with National Highways, who are responsible for the A421(T), and National Highways Safety Engineering Standards Team has undertaken a review of the illustrative designs and not raised any fundamental highway safety concerns. The capacity of the illustrative slip roads, and the wider highway network, has been assessed in a microsimulation model, and where relevant individual stand-alone junction assessments. Where necessary network improvements are proposed, and the residual cumulative impact of the development is not severe.

7. Paragraph 117 states that:

“Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*

- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”*

8. The Proposed Development includes high quality multi-modal corridors and inclusive access for all throughout the Site, which not only provides for movement within the Site, but movement across the Site, transforming the role of the Site from a current barrier to movement to a place served by routes for all.

National Planning Practice Guidance

9. The Ministry of Housing Communities and Local Government (MHCLG) provides a web-based National Planning Practice Guidance (NPPG). The resource includes guidance and good practice related to the preparation of ‘Travel Plans, Transport Assessments and Statements’ (March 2014).
10. As a prerequisite, the guidance suggests transport assessments should be made as useful and accessible as possible. This is achieved by ensuring that any information or assumptions are set out clearly and are publicly accessible.
11. The guidance indicates that Transport Assessments and Statements and Travel Plans can positively contribute in the following ways:
 - *‘encouraging sustainable travel;*
 - *lessening traffic generation and its detrimental impacts;*
 - *reducing carbon emissions and climate impacts;*
 - *creating accessible, connected, inclusive communities;*
 - *improving health outcomes and quality of life;*
 - *improving road safety; and*
 - *reducing the need for new development to increase existing road capacity or provide new roads.’*
12. The guidance specifies that it is linked directly to the NPPF which promotes a planning decision process that manages the patterns of growth and then focuses development in locations which are, or can be made, sustainable.
13. When defining the key principles of a transport assessment, the guidance states that Transport Assessments should be:
 - *‘Proportionate to the size and scope of the proposed development to which they relate and build on existing information wherever possible;*

- *Established at the earliest practicable possible stage of a development proposal;*
- *Tailored to particular local circumstances (other locally determined factors and information beyond those which are set out in this guidance may need to be considered in these studies provided there is robust evidence for doing so locally); and*
- *Brought forward through collaborative ongoing working between the local planning authority / Transport Authority, transport operators, Rail Network Operators, Highways Agency (Now known as National Highways) where there may be implications for the strategic road network and other relevant bodies engaging communities and local businesses in Travel Plans, Transport Assessments and Statements can be beneficial in positively supporting higher levels of walking and cycling (which in turn can encourage greater social inclusion, community cohesion and healthier communities).'*

14. The Proposed Development is supported by a Transport Assessment that reflects a Vision-led approach to transport planning as supported by the NPPF. The Vision-led approach taken supports objectives related to transport sustainability, including on carbon emissions, climate impacts, accessibility, connectivity, inclusivity, health and quality of life. It does so by moving away from a Predict and Provide approach that locks in car dependency. It builds on the Site excellent accessibility by sustainable modes of transport, maximising the opportunities for sustainable access that exist. The Transport Assessment that supports the Proposed Development has been produced through collaborative working with transport stakeholders and is based on robust evidence.

Strategic Road Network and the Delivery of Sustainable Development, DfT Circular 1/2022

15. The Department for Transport (DfT) Circular 01/2022 'Strategic road network and the delivery of sustainable development' represents the national policy in relation to the Strategic Road Network (SRN) and outlines principles that should be considered for determining planning and development proposals especially Nationally Significant Infrastructure Projects (NSIP) where specific national policy statements are not in effect.
16. The DfT circular 01/2022 published in December 2022 supersedes the DfT Circular 02/2013 of the same title.
17. The guidance also sets out the modalities by which National Highways (NH) will manage the SRN and assist with the delivery of sustainable development in relation to the SRN. Paragraph 13 and 14 of the guidance reads:

"13. As set out in the Transport Decarbonisation Plan, Gear Change, Bus Back Better and the second Cycling and Walking Investment Strategy, walking, wheeling, cycling and public transport must be the natural first choice for all who can take it. However, where developments are located, how they are designed and how well delivery and public transport services are integrated has a huge impact on people's mode of travel for short journeys. The company [National Highways] will therefore expect strategic policy-making authorities and community groups responsible for preparing local and neighbourhood plans to only promote development at locations that are or can be made sustainable

and where opportunities to maximise walking, wheeling, cycling, public transport and shared travel have been identified.

18. 14. *This approach seeks to make the most efficient use of capacity within the overall transport network, improve health and wellbeing, and support government policies, strategies and guidance that aim to reduce the negative environmental impacts of development.....*”The Transport Assessment supporting the Proposed Development reflects the context set by the Circular 1/2022 and has been prepared in close collaboration with National Highways and the DfT. Decarbonising Transport, A Better, Greener Britain, 2021
19. ‘Decarbonising Transport, A Better, Greener Britain’ was published in 2021 and sets out the ways in which the UK aims to achieve “Net Zero” by 2050. The document specifically applies to how this can be achieved in terms of transport.
20. The document sets out three key strategic priorities that need to be addressed to achieve this target. Of particular relevance to the development are the first two priorities, accelerating the modal shift to public and active travel and making public transport and active travel the natural first choice:
 - Accelerating modal shift to public and active travel;
 - Public transport and active travel will be the natural first choice for our daily activities;
 - The UK will have a cohesive, widely available, net zero public transport network designed for the passenger; and
 - The UK will use its cars differently and less often, with new technology helping reduce its carbon footprint.
21. The document suggests that technological breakthroughs are not required to encourage people to walk and cycle. This instead can be achieved through better quality infrastructure through high quality road designs, dedicated routes, and networks, and enabling people to access bicycles. These measures will help people feel safer and more confident walking and cycling for more and more short journeys.
22. The Proposed Development responds positively to these policies by delivering enhanced public transport access as well as a high quality permeable network of walking and cycling routes through the Site.
23. The document makes reference to longer journeys, and states that:

“Where the car remains attractive for longer journeys, it will face competition from high-speed decarbonised rail and zero emission coaches offering affordable alternatives.”
24. The document also aims for “delivering decarbonisation through places” and echoes the policies set out within the NPPF in that it states, “we will embed transport decarbonisation principles in spatial

planning and across transport policy making to ensure that new development is designed in a way that promotes sustainable travel choices.”

25. The overarching view of the document is that car-reliant developments will no longer be suitable in order to achieve the decarbonisation goals set by the UK. This is reflected in the foreword which states that:

“But we cannot, of course, simply rely on the electrification of road transport, or believe that zero emission cars and lorries will solve all our problems, particularly for meeting our medium-term carbon reduction targets to 2035... ...We cannot pile ever more cars, delivery vans and taxis on to the same congested urban roads. That would be difficult for the roads, let alone the planet, to tolerate. As we build back better from the pandemic, it will be essential to avoid a car-led recovery.”

26. The Vision led transport approach to the Proposed Development and the significant sustainable transport infrastructure improvements associated with it respond directly to the Decarbonisation agenda set by the UK government.

Local Planning Policy

27. Local planning policies are useful points of reference in order to understand how best to integrate the Proposed Development within its local context, providing an indication of local aspirations, in particular in terms of transport infrastructure. The following documents form the local planning policies for Bedford Borough Council (Bedford BC):

- Bedford Borough Local Plan 2030 – adopted in 2020;
- Bedford Borough Council Local Transport Plan, adopted in 2011; and
- England’s Economic Heartland’s ‘Transport Strategy: Connecting People, Transforming Journeys,’ published in 2021.

Bedford Borough Local Plan 2030, 2020

28. The 2030 Local Plan sets out a number of key strategic ‘directions’ for development within the Borough, including:

- Take advantage of improved east-west connectivity;
- Well planned growth that will avoid areas of high flood risk to support the creation of strong, safe, and sustainable local communities;
- Good design that will help to create safer and vibrant neighbourhoods; and
- Bedford Borough will increasingly be a place of choice for new business.

29. To achieve these, the following objectives are identified in the 2030 Local Plan:
 - Deliver high quality growth that will facilitate the development of more sustainable and inclusive places for local communities;
 - Support a stronger local economy delivering economic growth, broadening employment opportunities, and attracting and enabling high value businesses to prosper;
 - Improve the borough's transport infrastructure in order to support growth in the local economy and to make the borough more attractive as a place to live and do business. Reduce congestion in the borough, particularly into and around Bedford town centre and by making journeys by public transport, walking, and cycling more attractive to encourage an increase in more sustainable and healthy modes of transport;
 - Develop a strong and multi-functional urban and rural green infrastructure network; and
 - Support and create a high quality, inclusive and safe built environment.
30. UDX have chosen the Site in Kempston Hardwick because of its high accessibility potential at international, national, regional, and local levels. This is in line with the strategic objectives of the Local Plan 2030 and is further supported by development proposals that will support the delivery of significant sustainable transport infrastructure improvements in the development area. However, the Proposed Development represents a step-change for the Borough, and will deliver economic growth, employment opportunities, new development, and associated infrastructure beyond even the most optimistic forecasts in the Local Plan. The knock-on benefits for local business will be significant.
31. With regard to transport, within Section 12, the Local Plan states that:

“It is important that new development is located in the most sustainable locations and accessible by a choice of travel modes, including walking, cycling and public transport. This will help to reduce the need for people to travel by car, minimise congestion, improve road safety and meet climate change reduction targets.”
32. The Kempston Hardwick site has been selected by UDX especially because of its ability to harness sustainable travel access, since it is at the confluence of two railway lines. Rail access therefore forms a key opportunity for the delivery of the Proposed Development. Finally, the Proposed Development recognises the importance of local connections with communities immediately neighbouring the Site, and will deliver a network of active travel routes benefiting active travel across the area north to south and east to west.
33. Policy 89 sets out the requirements with regard to the provision of electric vehicle charging infrastructure. The policy requires new facilities for low emission vehicles to be integrated into new major development schemes where local centres of communal facilities are proposed. The policy does not, however, provide any standards for the level of electric vehicle charging points required at developments.
34. The Proposed Development will deliver EV charging facilities within its car parks.

35. The Local Plan 2030 sets out a programme of transport infrastructure measures to be implemented. The Local Plan states that the development of sustainable measures is not always sufficient to mitigate the impact of large-scale development, and that new infrastructure has a role to play in increasing access to economic activity. The key transport schemes identified in the Local Plan 2030 include:
- *“Re-development of Bedford Rail station and additional car parking provision;*
 - *Development opportunities around Ford End Road and Prebend Street;*
 - *Wixams railway station;*
 - *East West rail scheme (Oxford/Bedford/Cambridge);*
 - *Schemes identified in the Bedford Town Centre Strategy (Transporting Bedford 2020);*
 - *Marsh Leys Junction improvements;*
 - *A6/A421 junction improvements;*
 - *Dualling of the Bedford Western Bypass; and*
 - *Improvements on Highway England’s strategic road network e.g. improvements to the Black Cat roundabout junction.”*
36. The Proposed Development forms a catalyst to support significant improvements in rail service provision south of Bedford and within the Marston Vale area. It supports an extension of EWR beyond Milton Keynes, and the delivery of new East West Rail Station at the Site through the safeguarding of land. The Proposed Development also creates the opportunity for an expanded railway station at Wixams on the Midland Main Line. It will also be accompanied by the provision of a bus and coach hub integrated with the Full Wixams Station, creating a significant new node within the local bus network. The Proposed Development is therefore consistent and supports the objectives of the Local Plan 2030.

Bedford Borough Council Local Transport Plan, 2011

37. Bedford BC’s most recent Local Transport Plan (2011- 2021) sets out the transport aims and ambitions for the Borough and identifies key strategies, schemes and initiatives that could help achieve these. Whilst the Local Transport Plan (LTP3) period had passed in 2021, it remains the most up-to-date Local Transport Plan for the Local Authority and remains adopted policy.
38. The key vision of the LTP3 is:
- “To create a transport system in which walking, cycling and public transport are the natural choices of travel for the majority of journeys because they are affordable, healthy, convenient and safe alternatives to the private car.”*

39. The LTP3 is therefore in line with the general Policy direction at national level, which the Proposed Development responds to positively.

England's Economic Heartland's 'Transport Strategy: Connecting People, Transforming Journeys,' 2021

40. Bedford is part of the group of authorities contained within England's Economic Heartland (EEH). The EEH has produced a Transport Strategy which provides an overall framework for transport policies and delivery across the region. The purpose of the strategy is so that planning and highways authorities are able to develop their own suite of policies and plans to reflect their individual local issues.
41. The overarching ambition for the Strategy is to shape the transport future and deliver change given the once in a lifetime opportunity presented by the east-west rail route.
42. The strategy sets out that to deliver sustainable growth to achieve the ambition of the strategy, transport investment, travel behaviour and the way we think about moving around needs to change, and continuing with current travel behaviours will have a detrimental impact.
43. The Transport Strategy sets the policy framework, supported by an initial investment pipeline, which will deliver the ambition of the EEH which is guided by four key principles:
- *"Achieving net zero carbon emissions from transport no later than 2050, with an ambition to reach this by 2040;*
 - *Improving quality of life and wellbeing through a safe and inclusive transport system accessible to all which emphasises sustainable and active travel;*
 - *Supporting the regional economy by connecting people and businesses to markets and opportunities; and*
 - *Ensuring the Heartland works for the UK by enabling the efficient movement of people and goods through the region and to/from international gateways, in a way which lessens its environmental impact."*
44. Of particular relevance to the Proposed Development is the fact that the EEH sees the 'delivery of EWR and mass rapid transit systems as the catalyst for the transformation of our strategic public transport networks.'
45. The Proposed Development forms a catalyst for the delivery of the East West Rail scheme and supports the delivery of a new station to the south of Bedford.