



THAKEHAM

Planning Policy Team
Bedford Borough Council
Borough Hall
Caldwell Street
Bedford
MK42 9AP

31st August 2021

VIA EMAIL ONLY

Dear Sir / Madam,

Local Plan 2040 Draft Plan Consultation Representations on behalf of Thakeham Homes

These representations are made on behalf of Thakeham Homes in relation to the Regulation 18 Local Plan 2040 consultation.

About Thakeham

Thakeham is an infrastructure-led sustainable placemaker and is committed to creating new, extraordinary places, where the highest attention to detail makes a positive difference.

Thakeham build for the future, for communities and for individuals. Our approach sets us apart from our competitors. We deliver our schemes with a focus on sustainable development, looking ahead of current housing standards. From 2025, all Thakeham Homes will be carbon neutral in construction and zero carbon in lifetime use.

Each development is different and tailored to its locality, with careful consideration of the area's character, as well as the environment. As a sustainable placemaker first and foremost, Thakeham's commitment to improving existing communities means its schemes are design and infrastructure-led; engaging with education, highways, healthcare, utilities and other stakeholders from the start of a project. The delivery of homes facilitates the delivery of physical, social and green/blue infrastructure which benefits the wider surrounding area, as well as the new residents, and ensures that Thakeham create sustainable places to live and work.

The emerging Environment Bill sets out Government's target of 10% Biodiversity Net Gain across development sites. However, through our landscaping approach, we will seek to achieve 20% Biodiversity Net Gain, including hedgehog highways, year-round variation for wildlife, as well as green and blue infrastructure, open space and play space.

We will engage local primary schools with our 'Eddie & Ellie's Wild Adventures' initiative to promote the importance of ecology and biodiversity, delivering National Curriculum linked activities and early career-based learning.

Thakeham House, Summers Place, Stane Street, Billingshurst, West Sussex, RH14 9GN

www.thakeham.com

At every stage, our approach is one that ensures we leave a legacy behind that everyone can be proud of.

Thakeham design all homes to be beautiful and reflect the character of the area. The materials used across all developments are of the highest quality. Thakeham builds all developments tenure blind to ensure no drop off in quality.

As one of 12 members of the NHS Healthy New Towns network, Thakeham is a committed advocate of developing healthy places in line with the Healthy New Town principles. But over time, we have realised that these principles are just the starting blocks, and at Thakeham we are committed to delivering sustainable, zero carbon communities.

Our level of commitment to sustainability means that we are streets ahead of our competitors and aiming for a far higher level of impact. Thakeham has become the first housebuilder in the UK, and one of only five in the construction sector globally to have made commitments on the SME Climate Hub, and be part of the United Nations' Race To Zero campaign. As part of this, we have committed to the SME Climate Commitment. Recognising that climate change poses a threat to the economy, nature and society-at-large, our company has pledged to take action immediately in order to halve our greenhouse gas emissions before 2030, achieve net zero emissions before 2050, and to disclose our progress on a yearly basis. Our sites will include the following sustainability improvements:

- All Thakeham homes will be carbon neutral in production and zero carbon in lifetime operation by 2025. This puts us well ahead of the pledges we have made as referred to above.
- On all Thakeham developments we follow industry best-practice by taking a 'fabric first approach', which looks at how design and materials can contribute to the energy performance of the completed building.
- We will also consider the potential for incorporating sustainable energy features, such as air-source or ground-source heat pumps, communal rainwater recycling, solar panels, battery storage, renewable energy tariffs, and highly efficient heating and hot water systems.
- Thakeham uses a UK-based factory which manufactures panels using timber from sustainable sources. The off-site panelised system improves efficiency, speed of construction, quality, and reduces carbon emissions.
- Our Sustainable Procurement Policy encourages the use of recycled materials, such as otherwise nonrecyclable waste plastics (One tonne of MacRebur mix contains the equivalent of 80,000 plastic bottles), as well as utilise products part of a circular economy.
- We ensure that our whole supply chain is as local as possible. We have gold membership with the Supply Chain Sustainability School.
- On site, we monitor and aim to minimise construction travel emissions, construction waste and energy consumption and are registered with the Considerate Constructors Scheme.

Our approach sets us apart from our competitors. We deliver our schemes with a focus on sustainable development, looking ahead of current housing standards.

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Introduction

Thakeham are promoting land to the west of Eaton Socon, between Kimbolton Road to the north and Bushmead Road to the south. As part of this promotion, we have prepared a high-level Vision Document, which sets out our aspirations for the site that reflects our core values of sustainability and place-making. A copy of this document is appended to this letter as part of these representations.

Comments on Growth Strategy

Bedford sits within the Oxford-Cambridge Arc, which is the science and innovation capital of the country and is competing on the international stage. The ambition of government and local partners is the delivery of “high-quality, well-connected and sustainable communities making the Arc an even more beautiful place to live, work and visit.” In order to deliver on these ambitions, Bedford needs to provide sufficient high-quality housing and facilities that will attract new employers and allow existing to remain and attract the staff they need.

Bedford has good road and rail infrastructure in place, with further rail improvements coming forward in the form of East West Rail. This will make Bedford a preferred location for new growth in the future. To ensure sustainable growth across Bedford, development cannot be focussed solely around the existing town boundary as proposed under growth option 2a.

Focussing all new development around the existing settlement boundary would result in further pressure on the town’s educational, medical and social infrastructure as well as increasing congestion, which would have further negative impacts on the environment. This will also impact all other settlements within Bedford district, with no new development or services provided for the north of the district. There should be a more balanced approach to provision of growth and services ensuring all new and existing residents and employers are well catered for.

It would be more appropriate to spread development across the district, with smaller growth around Bedford and new settlements near existing and proposed transport infrastructure in the north of the district, that can be built with new services and community facilities that can take some of the pressure off existing services in Bedford.

Therefore, we believe that Options 2b, 2c, and 2d are all more appropriate as they identify new settlements at Wyboston that will be well supported by the existing Great Northern and Thameslink train services, as well as the new East West rail line, providing sustainable transport opportunities.

Growth options including a new settlement at Wyboston are more appropriate as they will provide additional services in the north of the district, which will benefit the wider population of the Borough beyond merely Bedford town centre.

Identifying the Wyboston area for growth allows for flexibility in future growth, that doesn’t have to be focussed around the Bedford settlement boundary.

Comments on Development Management Policies

Policy SB1 – Self-build

Thakeham supports the Council's policy to include self-build, and acknowledges the number of units provided in development over 100+ is by negotiation. However, as is the case across the country, any specific amount of self-build should be evidenced by demand in the area, rather than an arbitrary number based on the scale of development proposed.

Thakeham supports the Council's inclusion of a deadline for marketing plots for self-build after which they would be released from the self-build policy requirement. However, we believe that 12 months is too long, as land would remain fallow for the entire marketing period, plus the time then taken to obtain planning permission for conversion to alternative housing or uses.

Policy NE1 – Environmental Net Gain

Thakeham welcomes the inclusion of an environmental net gain policy. Thakeham seeks to deliver biodiversity net gain across all our sites and from 2025 20% biodiversity net gain (an increase on the government's mandated 10% minimum), and our developments in Bedford would be no different.

Comments on Call for Sites Assessment

As part of this submission, we have reviewed the Council's call for sites assessment and wish to provide comments on two sites in particular, which form part of Thakeham's promotion site:

- Site 930 – Land to the West of A1, Duloe; and
- Site 931 – Land to the South of Duloe (west of A1)

Although the Council's assessment for both sites is largely the same, we have responded to each separately below. Our comments relate to sections 2a, 3a, 4a, 8b, highways comments and Environmental Health.

Site 930 – Land to the West of A1, Duloe

The site was put forward with the potential to support 450 new residential dwellings in close proximity to Eaton Socon and A1 motorway.

2a. Within or adjoining site of nature conservation importance

It is acknowledged that the site sits within a SSSI impact risk zone. However, there are a number of physical barriers between the SSSI and this site, including the A1 motorway, the River Great Ouse, and housing at Crosshall, which is of a similar density proposed on this site. Accordingly, the provision of housing in this location would be of minimal risk to the SSSI.

2c. Potentially able to achieve a net gain in biodiversity?

Although no information was provided within the Call for Sites submission, we can confirm that at Thakeham we seek to deliver 20% biodiversity net gain across all our sites, and this site

would be no different. Biodiversity and environmental improvements are key components of Thakeham's place-making approach.

3a. Proposing a renewable energy scheme or extra energy efficiency standards?

Although the call for sites form did not include a specific answer, we can confirm that all Thakeham houses delivered on this site will be carbon neutral in production and zero carbon in lifetime use. PV panels will also be included within the development. We provide as standard electric vehicle charging pods to all market and affordable homes; this is as opposed to just the cabling to facilitate the purchaser installing a pod as we believe it important to have the pods in place to help encourage a change in people's behaviours and make renewable choices easier.

4a. Likely to impact on designated or non-designated heritage assets or their settings?

The assessment suggests there is potential for development of the site to harm heritage assets. The only heritage assets in close proximity to the site are the Grade II listed Eaton Oak and the St Neots conservation area, which are both on the opposite side of the A1 motorway. Housing has already been built around the Grade II listed building and also within the western part of the St Neots conservation area off Great North Road, so any proposals for housing development would not cause harm to the character of these assets. Furthermore, there is significant tree screening on both sides of the A1 between the site and these heritage assets to mitigate any visual impact. Accordingly, there would be no harm to existing heritage assets if the site were developed for housing.

8b. Within the existing settlement form?

Although the site lies more than 0.5 miles from any defined settlement boundary within Bedford district, it does lie less than 200 metres from the settlement boundary of St Neots in Huntingdonshire.

Highways Comments

The comments pick up the existing shared footway on the northern side of the B645, and state that a new crossing would need to be provided from the site to ensure pedestrian cycle links into St Neots. In addition, the comments state that access may need to be located further west along B645 to avoid any issues with the existing A1 slip road. This can readily be achieved as Thakeham control the land further along the B645 necessary to facilitate this access solution.

Environmental Health

Comments suggest noise from the A1 is a risk. However, this can be mitigated through bunds and noise attenuation walls, as was the case and has been provided to the east of the A1 in Eaton Socon and St Neots. Furthermore, proposed development can be designed to ensure appropriate orientation of buildings to further mitigate noise impacts.

Site 931 – Land to the South of Duloe (west of A1)

The site was put forward with the potential to support 400 new residential dwellings north of Bushmead Road, in close proximity to Eaton Socon and A1 motorway.

2a. Within or adjoining site of nature conservation importance

It is acknowledged that the site sits within a SSSI impact risk zone. However, there are a number of physical barriers between the SSSI and this site, including the A1 motorway, the River Great Ouse, and the settlements of Eaton Ford and Eaton Socon. Accordingly, the provision of housing in this location would be of minimal risk to the SSSI.

2c. Potentially able to achieve a net gain in biodiversity?

Although no information was provided within the Call for Sites submission, we can confirm that at Thakeham we seek to deliver 20% biodiversity net gain across all our sites, and this site would be no different. Biodiversity and environmental improvements are key components of Thakeham's place-making approach.

3a. Proposing a renewable energy scheme or extra energy efficiency standards?

Although the call for sites form did not include a specific answer, we can confirm that all Thakeham houses will be carbon neutral in production and zero carbon in lifetime use. PV panels will also be included within the development.

4a. Likely to impact on designated or non-designated heritage assets or their settings?

The assessment suggests there is potential for development of the site to harm heritage assets. However, the closest heritage asset is the Grade II listed house on Duloe Road which sits 550 metres to the north. This can be easily mitigated through screening.

8b. Within the existing settlement form?

Although the site lies more than 0.5 miles from any defined settlement boundary within Bedford district, it does lie less than 200 metres from the settlement boundary of Eaton Socon in Huntingdonshire.

Highways Comments

The comments identify that Bushmead Road forms part of the National Cycle Network, providing a low traffic route into Eaton Socon. Thakeham would look to connect this cycle network throughout our site, to provide a safe cycle route for all residents.

The comments note that there are bus stops in close proximity to the site. Despite current poor service frequency, Thakeham would seek to liaise with the bus companies to seek to increase these to support our development proposals.

Thakeham acknowledges that the current state of Bushmead Road may provide challenges to creating a new access to the site. However, this parcel is no longer provided in isolation, and when considered as part of the wider development opportunity that Thakeham are proposing, we would suggest Bushmead Road could provide cycle access only along the National Cycle Network, with other vehicular access provided at more suitable locations across the wider site.

Environmental Health

Comments suggest noise from A1 as a risk. However, this can be mitigated through bunds and noise attenuation walls, as provided to the east of the A1 in Eaton Socon and St Neots. Furthermore, proposed development can be designed to ensure appropriate orientation of buildings to further mitigate noise impacts.

Conclusion

In light of the above comments, we believe that these sites can be delivered within the plan period. They are available, deliverable within the plan period, are an appropriate location for sustainable housing development, and are viable as part of the wider scheme set out within our Vision Document.

This site will deliver a sustainable community of circa 2,500 units that are carbon neutral in construction and zero carbon in lifetime use.

We trust that these representations will be useful, and we would be grateful for confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

Yours sincerely,



Head of Planning (Eastern and Western)

Enc. Vision Document