

29 July 2022
Letter to BBC - 29 July 2022.docx



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Dear Sir / Madam

Bedford Borough Local Plan 2040: Plan for Submission (Regulation 19) Publication Stage Response on Behalf of BDW Trading Limited

I write to provide a response to the above consultation on behalf of our client, BDW Trading Limited. This group includes Barratt Developments and hence I shall refer to this name going forward.

Background

We provided a response in September 2021 to the Local Plan 2040 Draft Plan consultation. This comprised a letter from Savills dated 3 September 2021 which we have enclosed.

In December 2021, we provided an updated response to the call for sites which comprised the sites form and a vision document. We have also enclosed a copy of these documents.

Overview

The proposals for land at Box End, West of Bedford seek to deliver an exemplar sustainable urban extension of some 1,150 homes that meet or even exceed policy requirements in relation to issues such as bio-diversity net gain, renewable energy etc. Critically, the homes will contribute towards much needed market and affordable housing requirements in the core of the Oxford-Cambridge Arc, whilst at the same time delivering critical social infrastructure such as a new primary school, local centre and extensive informal and formal green infrastructure. Detail on the proposals is provided in the enclosed vision document which includes detailed master planning proposals. This should leave no doubt about the intent to deliver an outstanding living and recreational environment.

Land at Box End, West of Bedford is an accessible and sustainable location for residential-led, mixed-use development and should be identified as such in the emerging Local Plan for Bedford Borough. This site is located within the Kempston Rural Ward and the Kempston Rural Parish and is identified within the Call for Sites under Site ID 1334.

Land West of Box End Road, Kempston (as it is named) is identified under reference: 1334, in the Call for Sites. The housing quantum identified at that point in time is shown as 2,082 dwellings.

The call for sites assessment identified positive, neutral and negative potential aspects of development at this site. The potential negative points were not all site specific but nonetheless our responses to the potential negative points are listed below:

- Site is not within or adjoining the urban area or a defined settlement policy area, or within the built form of a small settlement. *There is insufficient capacity within the urban area to provide for the minimum requirements under local housing need and hence greenfield land will be required. This site is well related to the urban area of Bedford and Kempston.*

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- Protected species on the site. *There are no national, regional or local ecology designations and further ecology work can be undertaken to ensure species are fully surveyed and protected.*
- Potential harm to heritage assets. *The Historic Environment Desk-Based Assessment, prepared by Orion Heritage Limited demonstrates this is not the case.*
- Site is separated from a defined settlement policy area or the built form of a small settlement. *The same response is relevant here to the first bullet point above.*
- Site is not previously developed land. *There is insufficient previously developed land in Bedford Borough and hence to provide for the minimum requirements under local housing need and hence greenfield land will be required.*
- The site includes best and most versatile agricultural land i.e. grades, 1, 2 or 3a. *This is relevant for the wider area of the Borough and is not specific to this site which is considered to only include small parts of 2 and 3a and is not all arable land.*

We consider these few potential negative aspects and this location performs well in sustainability terms.

The assessment shows there are no showstoppers to development at Box End and Barratt Developments have an enviable track-record of delivering new sustainable development in Bedfordshire including at the Wixams.

There are positive aspects of the assessment including that there are no access constraints, no highway or junction capacity issues and no concerns over environmental matters such as flood risk, air quality, etc.

The Phase 1 ecological walkover of the Site confirmed that the habitats within and around the Site do not pose an 'in principle' constraint to residential development. Any development of the Site has the potential to increase not only the grassland diversity, but the habitat diversity overall.

As well as biodiversity improvements, the Site presents the opportunity to reinforce and enhance the green infrastructure network and corridors to provide east – west connectivity and movement. The Site is more than capable of delivering a 10% net gain in biodiversity and meeting the requirements of 30% new woodland planting to accord with the Forest of Marston Vale policies and SPD. A major piece of structural landscape along the B560 would include significant woodland planting to secure appropriate separation between existing communities and the new residential areas.

An appraisal of the existing baseline transport conditions demonstrates the Site has good connections to the local and strategic highway network. Box End has the opportunity to directly connect into, and enhance, the existing levels of walking, cycling and public transport infrastructure provision. The creation of a sustainable, mixed-use community at Box End will maximise internalised based trips, whilst active travel will be promoted through several 'corridors' running alongside key transport routes.

For the purpose of consideration under the National Planning Policy Framework, this site is within the definition of 'developable' being a site in a suitable location for housing development with a reasonable prospect that the site will be available and could be viably developed at the point envisaged for example 2025 onwards.

We can confirm that the site is a suitable location for housing development and that the landowners working in partnership with Barratt Developments intend to make the land available for housing development, subject to progress through planning and the site can be viably developed, commencing within the proceeding 5 years. Overall, the site is capable of being fully delivered within the proposed plan period.

BDW Trading Limited are in a unique position to have sales outlets from both Barratt and David Wilson brands. This allows for accelerated delivery rates. BDW Trading Limited have an unrivalled track record in delivering accelerated rates of home building in the housing market area as demonstrated in the table overleaf.

	FY 15/16	FY16/17	FY17/18	FY18/19	FY19/20	FY20/21	FY21/22	Average
Brooklands	290	236	237	262	229	170	163	227
Fairfields	168	243	217	211	156	126	140	180
Eaton Leys (Woburn Downs)	0	0	0	0	0	84	119	102
Wixams	0	0	4	122	135	202	154	123
Total	458	479	458	595	520	582	576	524

Conclusion

Land at Box End, West of Bedford is an accessible and sustainable location for residential-led, mixed-use development and should be identified as such in the emerging Local Plan for Bedford Borough. We acknowledge this would require a modification to the current consultation version of the Local Plan.

Yours faithfully



Planning Director

Copy: Barratt Developments

- Encl: Savills Letter to BBC of 3 September 2021 and Call for Sites Submission Form
 Vision Document by Savills, December 2021
 Historic Environment Desk-Based Assessment by Orion Heritage Ltd, March 2021
 Transport Briefing Note by jpp, July 2022
 Landscape Vision Text by Golby + Luck, July 2022
 Representations in Respect of Ecology by fpcr, July 2022
 Representation Forms, July 2022