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Our Reference: P911g

29<sup>th</sup> July 2022

Dear Sir/Madam,

**RE: Land off Bromham Road, Biddenham**

**Introduction**

On behalf of the landowner ( ), I am pleased to formally submit representations to the Bedford Borough Local Plan 2040 Regulation 19 (Pre-submission) consultation, together with the Response Form accompanying this letter.

We object to the spatial strategy set out in the draft Local Plan as matter of principle because it does not propose to allocate the most suitable sites in the most suitable locations. The approach taken by the Council is flawed, not only because it fails to recognise the more sustainable locations for growth, but also because it overly relies upon the delivery of sites that are in less sustainable locations and rely on the delivery of infrastructure that are uncertain and likely to cause delay. The full details of the objections are presented in this representation.

In order to assist the Council in preparing a sound and credible plan we advocate that additional sites are allocated in locations that are sustainable, meet the vision and objectives set out in the plan and present a significantly more deliverable and robust housing allocation.

**Proposed site for Housing Allocation**

This representation contends that land at Bromham Road, Biddenham should be identified as a residential development site and may be considered in conjunction with land to the east that is available for development. The sites may either be developed in isolation or together as access is achievable off the Bromham Road, where the two sites cojoin.

The land is approximately 2.18 hectares and comprises a small agricultural field that slopes from east down towards the river in the west. Access is gained off Bromham Road to the north. Residential development presently abuts the site to the north and will soon dominate the land to the south as the site off Gold Lane is developed by Dandara Properties. Land to the East has recently been marketed and it is understood that it is being promoted by a developer for residential purposes.

The site is identified on the attached plan (REF P911g 001) and is shown overleaf:



The adjacent river, the Great Ouse, has a flood plain that extends onto or near the site and technical assessments in the local area suggest that most of the site is outside of the flood plain in flood zone 1, leaving a parcel of land that is capable of delivering 25 or more residential dwellings.

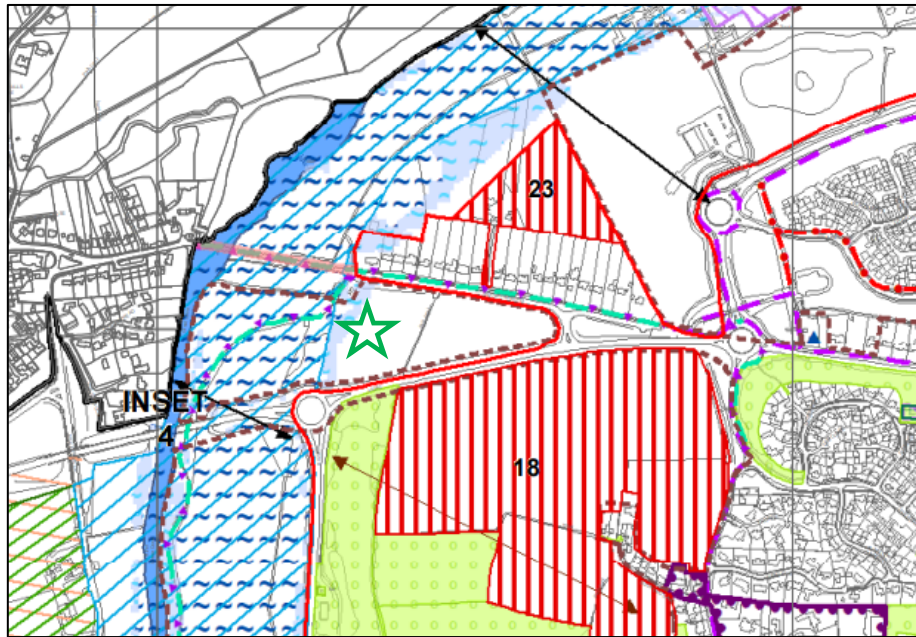
### **Planning Policy – Adopted Local plan 2030**

The site is presently lies on the edge of the Urban Area, but unusually this is bounded on two sides as shown below. Recent allocations (annotated 18 and 23) are in the early stage of construction or planning and once built will provide a clear built-up area surrounding the site, which will allow this site to operate as an infill site, contiguous with the edge of the urban area and provide a natural rounding off of this edge of the urban area.

The site is not affected by any other designations as indicated by the Policy plan below and therefore its proposal as an allocation in this review does not have the effect of undermining the broad strategy of the existing adopted Local Plan or the emerging one.

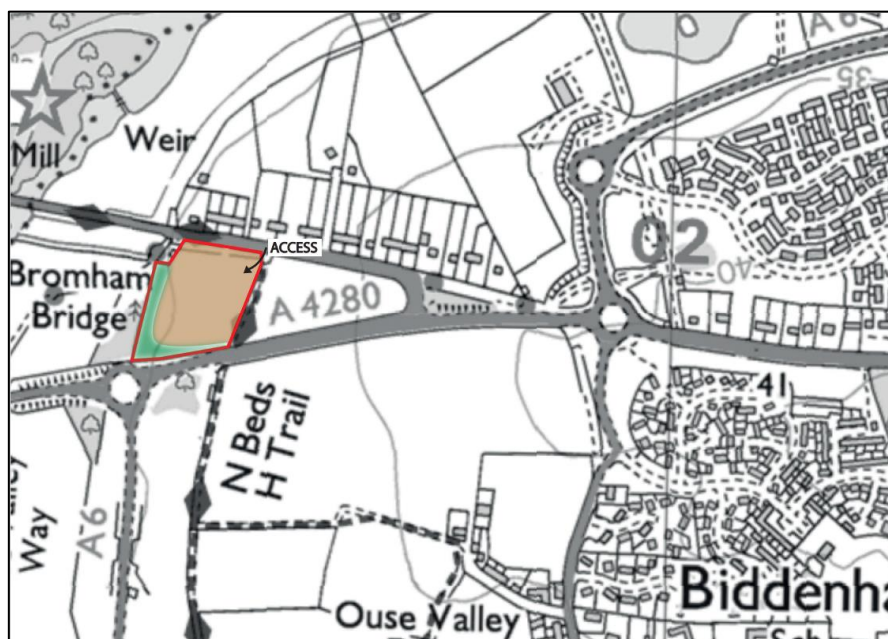
There is an existing access from the site directly onto the Bromham Road, which is a wide road, recently reduced to 20 MPH speed limit. Bromham Road has a footpath and bus route that provides a service to Bromham in the west and Bedford to the east. It is well located to local facilities, in walking distance to various community facilities such as recreation areas, play areas and retail facilities in both Bromham and Great Denham. A public footpath also extends along the eastern edge of the site that provides a direct route to Church End Biddenham.

The site will therefore be one of the most sustainable green field locations, be it that it can provide homes within easy reach of local village and town facilities and is immediately adjacent to the most sustainable settlement in the Borough. Access to public transport, cycle and pedestrian routes all capable of linking to the villages of Biddenham and Bromham and to the town railway station enable the site to reduce the use of the private car and allows an opportunity to encourage a modal shift:



*Adopted Local Plan 2030 Proposals Map – site identified with green star*

The below indicative parameter plan has been prepared to demonstrate how the site could be developed, identifying landscaping and green space on the sites western and southern boundary and residential development extending from the south to meet existing residential development on Bromham Road.



*Indicative Parameter Plan, showing the proposed access location*

## **Summary of Representations**

### **Visions and Objectives**

We support the broad intentions set out in the 'Vision and Objectives' in so far as they seek to deliver a greener, more sustainable and more attractive place to live, but there are overly optimistic statements about infrastructure delivery. Furthermore, the vision for new settlements is flawed and there is no recognition of the importance of growth located on the edge of the most sustainable locations, the urban area and larger existing sustainable settlements.

### **Spatial Strategy (DS2(S))**

The reliance on brownfield sites as housing allocations is a flawed approach as it overlooks the role that brownfield sites have as windfall opportunities. Their inclusion on a brownfield register, also negates the need to allocate as they are by definition acceptable for redevelopment. They should not be included in the plan to deliver new development.

The Plan relies too heavily on new settlements. They are not the most sustainable locations, take a very long time to emerge from conception to implementation and rely on significant new infrastructure. The Plan promotes new infrastructure opportunities but until these are in place there should be no reliance on their delivery because they are largely influenced by control outside of the Council.

The Plan fails to recognise the importance of small and medium sized sites, which is specifically supported by the NPPF. Moreover, there are many sites that are located on the edge of the contiguous edge of the Urban Area, or on the edge of existing sustainable communities in the rural area. These sites are more sustainable and more deliverable than the proposed new settlements and offer a better solution to deliver essential new homes into the borough.

Neighbourhood plans expire in 2030 and yet this plan is until 2040. There is a 10 year gap, at the very least where no development is proposed for much of the rural area, amounting to an embargo on development. This will have an impact on those communities as their need for homes increases whilst supply is not provided.

### **Amount and timing of Housing Growth (DS3(S))**

The flawed approach to the identification of suitable sites leads to a policy that delivers almost the entire requirement of this plan into the last ten years at an annual rate which is unrealistic. The rate for the last ten years is almost double that of the first five years, on an annual delivery basis.

The most recent evidence (Housing delivery test 2021) in Bedford suggests the highest rate historically is 1371 dwellings per annum. If 1,400 is achieved every year for 10 years this leaves a deficit of 3,000 dwellings that cannot be made up from any other sources of sites. All the brownfield sites will have been built out and there is an embargo in the rural areas in that 10 year period.

Given the lack sites from which dwellings are being delivered, this places huge pressure on the timing

of infrastructure and the delivery of each of the allocated sites.

There is no flexibility on the policy to deal with any delays. Not only is this indicative of the problem of selecting sites that have a longer than average lead-in time, it places pressure on the plan to succeed immediately given the lead-in time for the large sites that must deliver their first units in 2030, only 7 years after the likely adoption of this plan.

The plan does not take into account the significant delays that exist in preparing infrastructure for development and the process of getting new settlements into a position when they can maximize their output.

The Wixams case study is a case that the Council need to analyse and reflect upon. The plan system is based on a manage and monitor protocol and therefore reflecting on the past is an important approach.

In short, the Wixams project took from 1997, when it was first adopted to 2006 to achieve a planning permission. The first completion was in 2009, meaning that it took 12 years from adoption to the first completion. The new settlements in this plan, if adopted in 2023, would not see a completion until 2035.

The Wixams was built out by multiple developers and yet the initial phases of development have failed to deliver the number of dwellings anticipated. As of 2016 of the original first phase of 2,250 homes only 1,259 had been completed, the equivalent to 178 dwellings per annum over 7 years.

Based on the Wixams example the likelihood of an undersupply of homes across two new settlements is seriously likely to occur as it did with Wixams.

### **Distribution of Growth (DS5(S))**

The approach to rely on new settlements to deliver homes in the latter part of the plan is flawed as has been addressed, as it holds back 88% of the new allocations for the second half of the plan placing incredible burden on the first 10 years to deliver no less than might be needed.

Whilst it is noted that the distribution of growth identifies an excess of 1,274 dwellings above the requirement this does not go far enough to counter the very likely under supply from the new settlement strategy.

The distribution of growth policy reinforces the absence of any sites proposed on the edge of sustainable settlements. It also relies on the allocation of brownfield sites, some of which will be identified on the brownfield register. As indicated by the NPPF (para 23) these sites should not be allocated in the plan where they are identified in the register. Potentially this allows a redistribution of up to 1,200 units to the rural areas or the edge of the Urban Area to deliver vital homes in the first ten years of this plan.

### **Conclusion**

To conclude, it is considered that the emerging Local Plan 2040 and the proposed distribution of housing within it presents an over-reliance on substantial strategic sites and new settlements. The Council should consider sites that are located on the edge of the Urban Area, such as this one, ahead of less sustainable alternatives. We encourage the Council to create flexibility in the plan to accommodate this site to make a contribution to the delivery of homes.

Yours Sincerely,

[Redacted Signature]

[Redacted Name]  
[Redacted Title]  
[Redacted Address Line 1]  
[Redacted Address Line 2]