

Local Plan
Central Bedfordshire Council
Priory House
Monks Walk
Chicksands
Shefford
Bedfordshire
SG17 5TQ



Re : Central Bedfordshire Draft Local Plan
Consultation on Additional Evidence

Dear Sir

In response to the consultation on the above documentation and supporting information, please find enclosed my objections that I would like you to take into consideration.

My responses are summarised into the following sub headings.

- 1) C30 Sustainability Appraisal criteria – Issues and Opportunities.
- 2) Exam 113 – Housing Technical Paper.
- 3) Exam 114 – Transport Technical Paper.
- 4) Exam 115 – Sustainability Appraisal of the CBC Draft Local Plan Supplementary Report.
- 5) Summary.

Note all references to **CBC** mean Central Bedfordshire Council.

1) C30 Sustainability Appraisal Criteria.

I have inserted key Sustainability Objectives from Table 1 - SA Framework - as a reference

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| 1 | To ensure that the housing needs of all residents and communities are met |
| 3 | To improve accessibility to services and facilities |
| 6 | To maintain and improve the existing highway network and reduce associated indirect impacts on air quality and greenhouse gas emissions. |
| 7 | To encourage a demonstrable modal shift and reduce the need to travel. |
| 11 | To protect and conserve soil – need to retain and protect the best and most versatile agricultural land. |
| 12 | To protect, enhance and manage biodiversity & geodiversity. |
| 13 | Protect and enhance the landscape and townscape. |

Various statements are made within the various documents that relate to Biggleswade specifically and how it, and its immediate, area has significant factors that affect the sustainability of development proposals.

- The area is basically rural in nature and characterised as a market town character.
- At least 50% of residents commute out of the area.
- The rural economy is important to the Central Bedfordshire economy as a whole.
- In some areas there is insufficient highway capacity – this is particularly significant to the local north Biggleswade area.
- The loss of agricultural land is changing the landscape character of the Plan area.
- The land to the north of Biggleswade is classified as High Grades 1 and 2 agricultural land.
- Balancing the need for new development with the retention of a predominantly rural landscape character with far-reaching views and high levels of tranquillity.
- Increased pressure on water resources particularly in the Anglian region as a result of high population density and relatively low rainfall

2) Exam 113 – Housing Technical Paper

Within the draft Local Plan Important Countryside Gaps were identified to specific areas. Important Countryside Gap, CG18 was established to the land North of Biggleswade to protect the environment from development encroachment into the open countryside and Biggleswade Common. It is specifically to the north of Biggleswade and is at an extreme distance from the land identified for development to the east of Biggleswade.

See Exam 69 and Exam 113 para 3.7.1 – this Important Countryside gap has been removed. The reason stated is that, as the development area of the East Biggleswade (SA4) is not now part of any Identified Area for Future Growth there is not the need for the ICG 18. However, the CG18 **does not** relate to SA4 but HAS06 and its retention is imperative to prevent development encroachment in the North of Biggleswade, not the East. Therefore this ICG 18 should be reinstated into the Draft Local Plan. There is no justification for its removal.

See para 4.1.9 – the 5 year land supply figure currently sits at 6.19 years and bearing in mind that the Biggleswade East development (SA4) has Outline Planning Approval for the 1,500 dwellings, there is no need for the unsustainable site allocation of HAS06. Therefore, this HAS06 allocation should be removed from the draft Local Plan.

3) Exam 114 – Transport Technical Paper and CBC Sustainable Travel -expectations of new developments

See 3.2.2 / 3.2.3 / 3.2.10 / 3.2.13 / 3.2.14 / 3.2.15 / 3.2.16 / 3.2.17 / 3.2.18 / 3.2.1-Policy T1

The transport assessments regarding HAS06 must be re-examined in the light of the above statements. HAS06 currently has an Outline Planning Application registered with CBC (CB/19/04301/OUT) and as part of that application a Traffic Assessment and Transport Plan was submitted by the Developer. Currently the application has in excess of 700 separate objection submissions from local residents, Biggleswade and Sandy town councils, the vast majority of whom state the inadequate and dangerous local feeder roads, the single narrow substandard access route into the development, the only access via an existing estate road, the lack of any significant mitigation or improvement measures to the local road network, the unsafe nature of the access to all highway users. A separate report was commissioned by Biggleswade Town Council into the developer submitted travel plan. The findings of the report basically stated that the submitted Transport Plan was misleading, lacking in secure evidence base, flawed, does not conform to existing highway standards and is unsustainable.

I have appended the Biggleswade Town Council report, dated April 2020, to my submission email for your reference.

On the above basis allocation **HAS06 fails to meet any of the Transport Technical Paper's criteria** and the CBC Sustainable Travel requirements, and therefore should be withdrawn from the draft Local Plan.

3.3.3 work by Highways England on the proposed Cambridge/Oxford Expressway project is currently suspended and National Rail do not expect completion of the Bedford to Cambridge rail link until early 2030 at the earliest. Therefore, reliance on either of these two major infrastructure project, to facilitated development within the CB area should be disregarded, and reference to them as development criteria should be removed.

4) Exam 115 including 115A and 115B - Sustainability Appraisal of the CBC Draft Local Plan Supplementary Report

115A – Sustainability Appraisal objectives

1) *To ensure the housing needs of all residents are met* – the 5 year land supply figure is currently 6.19 years and therefore there is not a requirement for the level of some of the housing. Therefore, the unsustainable HAS06 allocation should be withdrawn from the draft local plan. Similarly Outline Planning Permission for 1500 dwellings on land east of Biggleswade (SA4) has been granted. Therefore, there is no need for the unsustainable development north of Biggleswade and therefore HAS06 should be withdrawn from the draft local plan.

3) HAS06 fails to meet the criteria to *improve accessibility to services and facilities* – previous objections and Biggleswade Town Council's report on Transport Assessment identify this. Travel distances a far in excess of those identified on Transport Plans.

6) *To maintain and improve the existing highway network and reduce associated indirect impacts on air quality and greenhouse gas emissions.* – HAS06 fails to meet this criteria. See all the previous objection letters relating to the local road network. See Biggleswade Town Council's report on Transport Assessment.

7) *“To encourage a demonstrable model shift and reduce the need to travel”* - HAS06 fails to meet this criteria. See all the previous objection letters relating to the local road network. See Biggleswade Town Council's report on Transport Assessment.

11) *“To protect and conserve soil – need to retain and protect the best and most versatile agricultural land.”*

HAS06 fails to satisfy this sustainability criteria. The site is located upon 100% agricultural land of high grade quality 1 and 2 and is currently farmed and contributing to the nation's food supply. Biggleswade over the last 10 years has lost vast amounts of high grade agricultural land to both housing and employment developments and is due to lose even more when SA4 development commences. Central Bedfordshire and the Nation cannot afford to lose

even more. We must prioritise the retention of this valuable asset – there are far more suitable sites of either Brownfield or lower land classifications within Central Bedfordshire. Therefore, allocation HAS06 should be removed from the draft local plan.

13) *“To Protect and enhance the landscape and town scape.”* – HAS06 is located outside the boundaries of Biggleswade and sits within open countryside. The area is utilised both as farmed agricultural land and for the local population as a valuable leisure asset enabling walking, running, cycling, keeping fit, archery, dog walking and equestrian activities within the open countryside. If this allocation is retained then far from enhancing the landscape, this valuable local asset will be lost and the landscape irreparably damaged . Therefore, this site allocation should be removed from the draft local plan

Exam 115 -

Within Chapter 5 some alternative sites were explored within the area B. Two of which that were discounted were North and North East Sandy. Biggleswade HAS06 is similar in location and has the same (or even worse) limitations and access issues as the Sandy options. So, given the same sustainability appraisal criteria, why has HAS06 not similarly been removed from the local plan allocations.

In view of all the foregoing I believe that aspects of the Draft Local Plan are still unsound, unrealistic and unsustainable, especially regarding site allocation HAS06 and its retention within the draft local plan. I believe HAS06 should be removed from the draft local plan

Could you please ensure that this letter is forwarded to the official Planning Inspectors together with the referenced Biggleswade Town Council traffic assessment report.

I would also take the opportunity by the sending of this letter, of registering my request to speak at any further public hearings into the Local Plan that the Planning Inspector may hold.

