

Thomas Mead & Nik Smith
Planning Department
Central Bedfordshire Council
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Dear Thomas Mead & Nik Smith

**Re Planning Application: CB/18/02458/OUT Land to the East of Baden Powell Way
Biggleswade**

OBJECTION

Hybrid application seeking:

Full planning permission for 240 dwellings (Use Class C3), up to 300sqm of community building (Use Classes A1, A2, A3, B1 and D1), associated access and hard and soft infrastructure including site access, internal roads, car parking, footpaths, cycleways, drainage and utilities; and

Outline planning permission with all matters reserved for subsequent approval for up to 1,260 dwellings (Use Class C3), up to 2ha of commercial development (Use Classes A1, A2, A3, A4, A5, B1 a, b, c, B2 ,B8), up to 2.5ha of primary school development (Use Class D1) and up to 4ha of other leisure and community development (Use Classes D1 and D2), up to 60ha of open space including play space, allotments and a country park, infrastructure including site access, internal roads, car parking, footpaths, cycleways, drainage and utilities and the demolition of existing buildings at the site.

This hybrid planning application is for EIA development as defined by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and is supported by an Environmental Statement.

CPRE Bedfordshire strongly objects to the above application for the following reasons:

30 years of standing up for Bedfordshire's countryside 1987-2017

CPRE Bedfordshire is the Bedfordshire Branch of the Campaign to Protect Rural England which exists to promote the beauty, tranquillity and diversity of rural England. We advocate positive solutions for the long term future of the countryside.

1. The Application is premature

Central Bedfordshire Council (CBC) has recently submitted its Local Plan 2035 to the Government (DHCLG) under Regulation 19 for approval by an Inspector at an “Inspection in Public”.

This democratic process is intended to examine all areas of the submitted Local Plan 2035 and to hear in public, representations from all stakeholders both for and against it.

Having heard all representations the Inspector will then decide if the Local Plan and the various Policies within it can be approved.

Many stakeholders including residents of Biggleswade, have made representations at the pre-submission stage to CBC voicing their serious concerns about the Local Plan generally and specifically the proposals for the development of 1,500 homes to the East of Biggleswade - Policy SA4.

These comments have been passed to the Inspector for consideration.

Stakeholders will make their concerns known again at the “Inspection in Public”.

The site described in this Application was put forward by the Applicant in the Local Plan 2035 “call for sites” and forms the basis of Policy SA4.

It seems to us therefore, that by submitting this Planning Application prior to the determination by the Inspector of the validity of Policy SA4, and the Local Plan 2035 itself that the Applicant is trying to subvert the democratic process.

It is CPRE Bedfordshire’s view that the Application should be refused on the grounds of prematurity.

Para 14 PPG - reasons for refusing an application on the ground of prematurity include:-

- a) The development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development central to an emerging Local Plan or neighbourhood planning; and*
- b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.*

2. CBC has a 5 year Forward Land Supply

CBC has demonstrated that it has a robust 5 Year Forward Land Supply. In fact, as at 1 July 2018 it has a Forward Land Supply of 5.82 years.

Therefore, CBC has no need for additional development land at this time and can wait until the Inspector has determined the validity of the submitted Local Plan 2035 and Policy SA4.

3. Biggleswade Neighbourhood Plan

Biggleswade Town Council has started the process of developing a Neighbourhood Plan as described in the Localism Act.

The Neighbourhood Plan will enable local residents to decide, amongst other things and against the background of housing targets set by CBC’s approved Local Plan 2035, which

land should be developed and what type and design of dwellings and other development they would like to see in their area.

Biggleswade Town Council should therefore be allowed to complete their Neighbourhood Plan before either they, or CBC consider this major Planning Application which will have a considerable impact on their area and which their Neighbourhood Plan may not approve of.

4. The Applicant should have provided more detail of the proposals contained in the Outline section of the Application.

CPRE Bedfordshire does not believe that it is appropriate for a Planning Application of this type to be handled as a Hybrid Application with such minimal "Outline" information when it represents the development of a single large village and associated infrastructure on a very substantial area of land.

The entire site being 106.5 ha (270 acres) - equivalent to 152 football pitches.

This lack of detail is particularly problematic with this Application since the various elements (Full and Outline) of the site - dwellings, community facilities, schools, minor and major highways infrastructure, water/sewage systems, open green spaces etc. etc. will be very interdependent one upon the other.

4a. With regard to the "Outline" part of the Planning Application:

The Applicant has given nothing but very rough details of the plans for 1,260 dwellings and 2 ha of Commercial Development. The same is true for the Primary School and the 4 ha for Leisure and Community Development.

The Applicant states that a total of up to up to 60ha will be allocated to Open Space, Allotments, a Country Park, Infrastructure including Roads, Footpaths, Cycle Ways, Utilities etc. etc. without being specific about how much land will be allocated to each of these areas.

60 ha sounds like a lot of land but it may not seem so generous when it is allocated to each of the areas specified above by the Applicant. It is accepted that, at an early stage of planning, it is not always possible to included comprehensive details.

However, CPRE Bedfordshire believe that more detailed Outline plans, particularly regarding land use, should have been incorporated by the Applicant.

For a strategic site of this nature which is effectively an urban extension to the town of Biggleswade and which will impact on surrounding villages, we consider this to be unacceptable.

Yours sincerely

Gerry Sansom

CPRE Bedfordshire