



Bedford Borough Council – Local Plan 2035 Consultation Paper Response Form

Please use this form to respond to the questions raised in the Local Plan 2035 Consultation Paper. It should be read alongside the consultation paper and technical documents referred to; copies of the documents are available to view on the Council's website at www.bedford.gov.uk/localplan2035 or in hardcopy at our Customer Service Centre (at 2 Horne Lane, Bedford MK40 1RA) and all libraries in the borough during normal opening hours. Documents are also available at Rushden, St Neots, Biggleswade and Flitwick libraries outside of the borough.

Please send your response electronically if possible or as a WORD document via email to planningforthefuture@bedford.gov.uk.

Alternatively responses can be sent by post. Please attach a stamp and send to:
Bedford Borough Council,
Local Plan 2035 consultation,
Planning Policy Team,
Borough Hall,
Bedford, MK42 9AP

PLEASE DO NOT SUBMIT COMMENTS IN MORE THAN ONE FORMAT OR SEND TO MORE THAN ONE EMAIL ADDRESS. If you have submitted comments electronically you do not need to print and post them.

All responses (electronic and paper) must be received by 5pm on Friday 9 June 2017.

Your contact information will be kept on the Planning Policy database so that we can keep you up to date about this and other planning policy documents. We do not share contact details with other parts of the Council or other organisations. If you do not want your details to be retained (which would mean no further updates from us about the Local Plan 2035) please let us know by sending an email to planningpolicy@bedford.gov.uk.

All responses will be made public.

CONTACT DETAILS

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If you are using an agent, who would you prefer any correspondence to go to?

(Please mark X one box only)

Contact agent Contact client Contact both

Your interest (Please mark X one box only)

Land owner Resident Consultant Agent Other

Please specify 'Other' (please write in)

QUESTIONS

1a) Do you agree or disagree that one or more of the four new settlement proposals should form part of the development strategy? (Please mark X one box only)

Agree Disagree

1b) If you disagree, the 2,200 dwellings identified for new settlement(s) as part of the preferred strategy will need to be provided elsewhere: where should the development go instead? (Please write in)

2a) Do you agree or disagree that the brownfield site opportunity at Stewartby brickworks should form part of the preferred development strategy? (Please mark X one box only)

Agree Disagree

2b) If not, the 1,000 dwellings proposed at Stewartby Brickworks as part of the preferred strategy will need to be provided elsewhere: where should the development go instead?

(Please write in)

3a) Do you agree or disagree with the principle that all suitable and available sites in and on the edge of the urban area should be allocated? Currently this amounts to 1,988 dwellings. (Please mark X one box only)

Agree Disagree

3b) If you think that not all of this should be allocated for development where should the development go instead? (Please write in)

We agree that all suitable sites within the urban area should be used. However, not all of the sites which are categorised as “urban” seem in fact urban: sites 691 and 29 (Gold Lane, Biddenham) are really located at the edge of the urban area. We think this distinction is important, because sites at the edge of the urban area will be more reliant on cars and therefore have a disproportionate impact on traffic around and into Bedford.

We are very concerned that little or no consideration has been given in the Site Selection Methodology and Rural Settlement Hierarchy Scoring Methodology to the impact on traffic. The current proposal allocates around 2,250 out of 8,013 new dwellings to the rural area to the North of Bedford (about 28% of new developments), which together with one of the new settlements at either Sharnbrook, Thurleigh or Milton Ernest would increase (initially) to 4,450 out of 8,013 new dwellings, or about 55% of new developments.

All of the extensions to the urban area (1,111 sites) are located around the Northern and Western fringes of Bedford. It is for this reason that Gold Lane needs to be considered in conjunction with the extension to the urban area, bringing this to a total of 1,271 new dwellings. We think it is inevitable that the traffic flow from the Northern rural areas will meet and interact with the traffic flow from the extension to the urban area. Traffic flow on the A6 and A428 around Bedford during peak traffic hours is already extremely congested. The current development proposals would mean cars from a further 5,721 dwellings (or 71% of all new developments) would hit Bedford from the West and North. This is an unacceptable outcome given the already high level of congestion.

We appreciate that any development at the Stewartby brickworks will take more time to develop, but this seems to us to be the Borough’s best option to develop the substantial number of new dwellings required. Every effort should be put into exploring all possibilities of developing this site further and faster.

4a) Do you agree or disagree with the proposed allocation of urban and edge of urban sites listed in table 1 and table 3? (Please mark X one box only)

Agree Disagree

4b) Are there any sites which you think should not be allocated or any other sites which you think should be allocated and why? (Please write in)

The stated objective is to regenerate the urban area of Bedford and Kempston together with sustainable urban extension. However the current development allocates only a comparatively small number of dwellings to Bedford and Kempston: 877 dwelling out of 8,013 dwellings or approx. 10%. All sites in Table 3 are in reality rural or semi-rural in character and location. A development of these ‘edge of urban sites’ will result in a gradual expansion of Bedford into surrounding villages.

We are concerned that this strategy was not adequately considered in the Sustainability Appraisal which was conducted in January 2014 and analysed the SA Objectives for each Spatial Option.

5a) Do you agree or disagree with the amount of development identified for the Group 1 villages as part of the preferred development strategy (2,600 dwellings)? (Please mark X one box only)

Agree Disagree

5b) If not, should the amount be higher or lower, what should the number be and how should the

strategy change as a result? (Please write in)

The number of proposed dwellings will substantially and irreversibly change the character of a number of Group 1 villages. A growth by 500/600 dwellings over 15 years or so (possibly less) has to be judged against the way these communities developed organically over centuries based on local demands and the ability to support these communities. This radical growth can only be supported as a result of cars which allow people to commute between rural hamlets and the centres of employment. Representing a Parish in rural North Bedfordshire, we are very concerned that little or no consideration has been given to the impact on the flow of traffic into Bedford which will significantly impacted by the proposed 1,600 new dwellings in Bromham, Clapham and Sharnbrook. This will materially and negatively effect all residents in the rural communities, and will result in an urbanisation of rural communities.

6a) Do you agree or disagree with the list of potential development sites in each Group 1 village (tables 4 – 8)? (Please mark X one box only)

Agree Disagree

6b) Which sites in Group 1 villages would you prefer to see allocated and why? Which of the options do you prefer and why? Are there other combinations of sites? (Please write in)

7a) Do you agree or disagree with the amount of development identified for the Group 2 villages as part of the preferred development strategy (225 dwellings)? (Please mark X one box only)

Agree Disagree

7b) If not, should the amount be higher or lower, what should the number be and how should the strategy change as a result? (Please write in)

As a Parish Council we are consulting on the appropriate number of future developments as part of developing our Neighbourhood Plan. We are pleased to see that the final allocation will be determined by our Neighbourhood Plan.

We would like to note that the impact of any development will be felt more acutely in a small rural community than in an urban setting, where any development is more readily absorbed. This top down planning approach is difficult to accept for small local communities in which the population is less transient and more acutely aware of changes. We acknowledge the difficult position the Borough Council is in and very much appreciate the challenges inherent in developing any planning framework and balancing competing demands and requests. However, we also do not think that the development of 225 dwellings in Group 2 villages can be seen in isolation.

We ask the Borough Council to appreciate the impact of the currently proposed development in aggregate. As it stands, the plan envisages at least 2,250 out of 8,013 new dwellings in the rural area to the North of Bedford (about 28% of new developments), which together with one of the new settlements at either Sharnbrook, Thurleigh or Milton Ernest would increase (initially) to 4,450 out of 8,013 new dwellings, or about 55% of new developments. The scale of 4,450 new dwellings over the course of 15 years together with a possible further 3,800 dwellings resulting in a total of 8,250 planned dwellings as the potential sites in Sharnbrook, Thurleigh or Milton Ernest reach their potential will cause irrevocable damage to the rural character of this area.

We cannot see any evidence that these macro considerations have been taken into account in the development of the plan. The overall impact is lost as the plan focuses on individual sites. This is especially apparent:

- (a) in the way that the new development plan (which now includes new developments) has not been assessed in a Sustainability Appraisal akin to the January 2014 analysis of the Spatial Option;
- (b) in that there has been no assessment of the traffic impact. The daily experience of the residents in the rural communities is that each of the villages has its pressure points through narrow single lanes, roads blocked by parked cars because there are insufficient off-road parking spaces, single lane bridges and, of

course, congested traffic junctions such as the Sainsbury's round about in Bedford. It is difficult to imagine how new infrastructure can be built through ancient villages and across the Great River Ouse without damaging the overall landscape. The desperate situation is made worse once the edge of urban areas to the North and West of Bedford are taken into account which will inevitably impact on the traffic on the A6 and A428. This means the additional traffic caused by a total of initially 5,721 dwellings and later potentially up to 9,521 dwellings (in each case taking into account all developments to the North and West of Bedford and the sites at Sharnbrook, Thurleigh and Milton Ernest) need to be managed in and around the fringes of Bedford; and

(c) because no consideration has been given to a development scale which will result in a more than doubling of the rural population in less than a generation.

We urge the Borough Council to put every effort into the development of the Stewartby brickworks. This is a brown-field site to which none of the consideration outlines above apply.

8a) Do you agree or disagree with the shortlist of sites for each Group 2 village (tables 9 – 14)? (Please mark X one box only)

Agree Disagree

8b) If not, which sites should be included or excluded from the list? Which sites do you think should be allocated in each village to meet the strategy requirement? (Please write in)

For Harrold the allocation of sites will be decided as part of the Neighbourhood plan.

9a) Do you agree or disagree with the approach for Group 3 and Group 4 settlements in the preferred development strategy (that rather than having specific sites allocated in the local plan there should be a local plan policy to allow small amounts of development if supported by the local community)? (Please mark X one box only)

Agree Disagree

9b) If not, how should Group 3 and Group 4 settlements be treated in the development strategy? Do you have any comments on the wording of the draft policy for Group 3 and Group 4 settlements? (Please write in)

10a) Do you agree or disagree with the selection of Local Green Spaces? (Please mark X one box only)

Agree Disagree

10b) If not, and given the site assessment work that has already taken place, which sites do you think should be removed from or added to the list? (Please write in)

11) Do you have any comments on any of the updated or new evidence base? (Please write in)

12) Specifically in relation to the new settlement proposals, do you have any comments on our initial appraisal of the sites that have been put forward, set out in the study "New Settlements Assessment Framework Methodology and Initial Site Assessment"? Having read the initial appraisal do you have a preference for which settlement(s) the Council should investigate

further with a view to allocation? (Please write in)
