

Mr. Greg Logan
Planning Department
Bedford Borough Council
Borough Hall
Cauldwell Street
Bedford MK42 9AP

1 January 2019

Dear Mr Logan

**Planning Application No: 18/03100/MAO
Land Off Deep Spinney Biddenham Bedfordshire**

Outline planning application for up to 160 dwellings including vehicular access from Gold Lane, emergency only access from the A4280, pedestrian and cycle links, public open space, car parking, drainage, landscaping and other associated works. All matters are reserved except for access.

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

1. The Application is “premature” - trying to subvert the democratic process

Bedford Borough Council (BBC) has recently (5 December 2018) submitted its Local Plan 2030 to the Government (DHCLG) under Regulation 19 for approval by an Inspector at an “Inspection in Public”. Inspectors were appointed on the 14 December 2018.

This democratic process is intended to examine all areas of the submitted Local Plan 2030 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 2030 and the various Policies within it can be approved.

Many stakeholders including residents of Biddenham and elsewhere in Bedford Borough have made representations at the pre-submission stage to BBC, voicing their serious concerns about the Local Plan 2030 generally and specifically the proposals for the development of 160 dwellings on this same site, which is named “Land at Gold lane Biddenham” in the Local Plan 2030.

These comments have been passed to the Inspector for consideration.

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

A larger site only part of which is described in this Application was put forward by the Applicant in the Local Plan 2030 “call for sites”.

BBC has included part of the larger site in their Local Plan 2030 and it forms the basis of housing development under **Policy 19 “Land at Gold Lane, Biddenham”** see pages 52 & 53.

It should be noted, that the site put forward in this Application is in fact somewhat larger than the site indicated under Policy 19 in the submitted Local Plan 2030 - it extends further to the west and is therefore in part, outside the “Potential Development Area” indicated on the map of the site in the Local Plan page 53.

It seems to us therefore, that by submitting this Planning Application prior to the determination by the Inspector of the validity of Policy 19, and the Local Plan 2030 itself, 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 - the Local Plan 2030 is at a very advanced stage having been submitted to the Government for Inspection.

As far as the village of Biddenham is concerned this also represents a very substantial development.

Para 14 - Governments Planning Practice Guidance (PPG) - reasons for refusing an application on the grounds 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. BBC has a 5 year Forward Land Supply

BBC has demonstrated that it has a robust 5 Year Forward Land Supply.

In fact, according to the Monitoring section of the BBC Planning Policy website, it has a Forward Land Supply of 5.71 years.

Therefore, BBC has no need for additional development land for housing at this time and can wait until the Inspector has determined the validity of the submitted Local Plan 2030 and Policy 19.

Yours sincerely

Gerry Sansom

CPRE Bedfordshire