



Bedford Borough Council Local Plan 2040

Draft Plan Consultation June 2021

September 2021



gladman.co.uk



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1 INTRODUCTION

1.1 Context

1.1.1 Gladman welcome the opportunity to comment on the Bedford Local Plan 2040 consultation, and request to be updated on future consultations and the Plan's progress.

1.1.2 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK, alongside participating in many Examinations in Public.

1.1.3 The Council will need to carefully consider its spatial strategy and associated policy choices to ensure that the proposed approach positively responds to the revised National Planning Policy Framework (2021). There will also be a need to take consideration of changing circumstances associated with national planning policy and guidance over the course of the plan preparation period, including the Government's emerging proposals for the planning system, as set out in the Ministry for Housing, Communities and Local Government (MHCLG) consultations on "Changes to the Current Planning System, August 2020" and "Planning for the Future, August 2020", in addition to the Queens Speech at the State Opening of Parliament in May 2021.

1.1.4 Gladman are promoting the following sites in Bedford Borough for residential development:

- Land at Hookhams Lane, Renhold (ID: 602)
- Land North West of Hall End Road, Wootton (ID: 603)
- Land at Bedford Road, Willington (ID: 566)

1.1.5 Each of the sites is available, suitable and deliverable for housing with further details provided at section 5 of this submission.

1.1.6 In addition, Gladman have submitted a separate representation to this consultation regarding Land off The High Road, Shortstown.

1.1.7 Gladman looks forward to engaging further with the Council as the plan preparation process progresses and would welcome an opportunity to discuss our portfolio of sites with the Council.

1.2 Plan Making

1.2.1 The National Planning Policy Framework sets out the four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

2 LEGAL COMPLIANCE

2.1 Duty to Cooperate

2.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.

2.1.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Bedford Borough Council must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.

2.1.3 The revised Framework has introduced a number of significant changes to how local planning authorities are expected to cooperate, including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist¹. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with.

2.1.4 The Oxford Cambridge Arc is central to the rationale behind the need to rapidly review and update the Bedford Local Plan 2030 under the provisions of Policy 1. This policy was

¹ PPG Reference ID: 61-001-20180913

included in the Plan as a main modification because of the pressing need for a plan to be put in place to respond appropriately to longer term requirements, and in particular the Arc, as soon as possible². Careful consideration must therefore be given under the Duty to Cooperate to the emerging spatial framework for the Arc, and any associated infrastructure and development needs as work on the new Bedford Local Plan 2040 continues.

- 2.1.5 The economic importance of the Oxford-Cambridge Arc cannot be overstated; it is a globally significant place with 3.3 million people, supporting 1.8 million jobs and contributing £90 billion of Gross Valued Added to the UK economy annually³. To capture and enhance the socio-economic value in Bedford, forward-thinking and investment in the growth of settlements across the Borough is required through the Local Plan Review. The scale of growth required will necessitate not only the expansion of existing settlements but also the identification of large-scale strategic sites that can take advantage of the planned East-West Rail route.

2.2 Sustainability Appraisal

- 2.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 2.2.2 Gladman note that the Draft Plan consultation is accompanied by a Sustainability Appraisal dated June 2021. Bedford Borough Council (BBC) should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Borough Plan Review's decision-making and scoring should be robust, justified and transparent.

² Paragraph 17, Bedford Borough Local Plan 2030, Inspectors' Report, December 2019

³ UK Government (no date). 'Government response to 'Partnering for Prosperity: a new deal for the Cambridge-Milton Keynes-Oxford Arc''. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752040/Government_response_to_Partnering_for_Prosperty_a_new_deal_for_the_Cambridge-Milton_Keynes_Oxford_Arc.pdf

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- 2.2.3** It is noted from the Draft Sustainability Appraisal Report (July 2021), that more detailed location options for growth will be considered in the final Sustainability Appraisal Report which will be prepared as the local plan is finalised. Through the sustainability appraisal process, careful consideration should be given to the ability of sites of varying size, location and nature to contribute towards sustainably meeting future housing needs in full. The wider strategic context of the area as a location for economic growth and change must also be a key factor in identifying a sustainable growth strategy for the borough through to 2040.

3 NATIONAL PLANNING GUIDANCE

3.1 National Planning Policy Framework

3.1.1 On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework which was subsequently updated in February 2019 and July 2021. These publications formed the first revisions of the Framework since 2012 and implemented changes that were informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft Revised Framework consultation.

3.1.2 The revised Framework introduced a number of major changes to national policy which provide further clarification to national planning policy as well as new measures on a range of matters. Crucially, the changes to national policy reaffirm the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, Paragraph 16 of the Framework (2021) states that Plans should:

"a) Be prepared with the objective of contributing to the achievement of sustainable development;

b) Be prepared positively, in a way that is aspirational but deliverable;

c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."

- 3.1.3 To support the Government’s continued objective of significantly boosting the supply of homes, it is important that the Borough Plan Review provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.
- 3.1.4 In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method, unless there are exceptional circumstances to justify an alternative approach.
- 3.1.5 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing needs. While Annex 2 of the Framework provides updated definitions for the terms “deliverable” and “developable.
- 3.1.6 Once a local planning authority has identified its housing needs, these needs should be met as a minimum, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies such as those relating to Green Belt and giving consideration as to whether or not these provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the Framework), Local Authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see Paragraph 35 of the Framework).
- 3.1.7 The July 2021 revision to the NPPF provides greater focus on the environment, design quality and place-making alongside providing additional guidance in relation to flooding setting out a Flood Risk Vulnerability Classification at Annex 3, the importance of Tree-lined streets and amendments to Article 4 directions. Additionally, Local Plans which have not yet progressed to Regulation 19 stage should ensure that where strategic developments such as new settlements or significant extensions are required, they are set within a vision that looks ahead at least 30 years (See paragraph 22).
- 3.1.8 The amendments coincide with the publication of the National Design Guide and National Model Design Code, a toolkit which helps local communities to shape local design needs

and provide guidance for creating environmentally responsive, sustainable and distinctive places with a consistent and high-quality standard of design.

3.2 Planning Practice Guidance

3.2.1 The Planning Practice Guidance (PPG) was first published by the Government to provide clarity on how specific elements of the NPPF should be interpreted. The PPG has been updated to reflect the changes introduced by the revised NPPF to national planning policy and provides further clarity on how specific elements of the Framework should be interpreted when preparing Local Plans.

3.3 National Planning Policy Consultations

3.3.1 On the 6th August 2020, Government published the Planning for the Future White Paper setting out proposals for how it is seeking to 'radically reform' the planning system. The proposals are seeking to streamline and modernise the planning process.

3.3.2 In February 2021 a consultation on draft revisions to the NPPF and a new draft National Model Design Code were published with changes focussed on the impact and contribution of design, tree-lined streets and the use of Article 4 directions⁴. The vast majority of the proposed changes have been incorporated within the revised July 2021 Framework.

3.3.3 In her speech at the State Opening of Parliament in May 2021, the Queen announced that the Government will introduce "laws to modernise the planning system, so that more homes can be built, will be brought forward...". Notes accompanying the speech confirm that a future Planning Bill will seek to create a simpler, faster, and more modern planning system that ensures homes and infrastructure can be delivered more quickly across England.

3.3.4 Timescales in respect of these proposed changes remain uncertain, however subject to the outcomes of these process, the Government has signalled its intent to make rapid progress toward this new planning system through the swift introduction of new legislation to implement the changes. It will be important that the Council keeps abreast with the

⁴ National Planning Policy Framework and National Model Design Code: consultation proposals: <https://www.gov.uk/government/consultations/national-planning-policy-framework-and-national-model-design-code-consultation-proposals>

implementation of these changes to determine any potential implications for the Local Plan 2040.

4 BEDFORD LOCAL PLAN 2040: DRAFT PLAN

4.1 Background

4.1.1 BBC's Local Plan 2030 was adopted in January 2020 and sets out the strategic vision and broad policies to guide development in the borough up to 2030. A main modification was made to the Plan following its examination to introduce a requirement for a review of the plan and for an updated/new plan to be submitted for examination within 3 years of its adoption.

4.1.2 This consultation on the Draft Plan builds on the Issues and Options Consultation that was undertaken in Summer 2020. As with the Issues and Options consultation, the Draft Plan does not make decisions on the final strategy for the Local Plan 2040, which are expected to be set out in a Submission Version of the Plan, which is timetabled for publication under Regulation 19 in Summer 2022.

4.1.3 The Chief Planner made clear in October 2020⁵ that strong local plans are crucial to facilitate the country's recovery from the impacts of the pandemic; and importantly address our communities housing needs and the economic challenges that lie ahead. The Chief Planner further conveyed:

"don't let uncertainty stop you from progressing your work, particularly in respect to the preparation of your plans for your area or your projects. It's important that we try not to lose momentum"

4.1.4 Considering this, Gladman are encouraged by the Council's timescales relating to the Local Plan 2040, which anticipates adoption in Winter 2023 in line with the requirements of Policy 1 of the Local Plan 2030. It is however important that local plan making in the area remains responsive to the emerging strategic context that will be formed by the emerging spatial framework for the wider Oxford-Cambridge Arc area. In particular, the contribution of Bedford in setting the foundations for the delivery of the central ambitions of the Arc to support sustainable economic growth; make the area a brilliant place to live, work and travel in; and, support lasting improvements to the environment, green infrastructure and biodiversity.

⁵ MHCLG Planning Newsletter October 2020

- 4.1.5 The sections that follow below include specific comments from Gladman on the Draft Plan and emerging evidence base.

4.2 Neighbourhood Planning

- 4.2.1 The consultation document in sections 1.46 to 1.51 notes that several of the borough's parish councils have played a significant role in progressing commitments for housing growth in the 2020 – 2040 plan period, with ten local communities choosing to prepare neighbourhood plans when given the opportunity in 2017. The context for neighbourhood plans that have been prepared to date is the spatial strategy and housing requirement contained in the adopted Local Plan 2030. The process of preparing a new local plan that takes into account the housing requirement derived from the standard method in national planning guidance for the period 2020 to 2040 will therefore necessitate the full reconsideration of the spatial strategy and the sustainable contribution that neighbourhood areas can make towards meeting development needs.

4.3 Vision and Objectives

- 4.3.1 The proposed vision sets a series of ambitions for the borough over the plan period. At this stage final decisions have not yet been taken with regard to the spatial strategy and the location of key strategic developments across the borough that will need to be planned for over the plan period. Further consideration may therefore need to be given to the content of the vision to reflect the final policy choices that are made as the plan preparation process progresses. In particular, it will also be necessary to take note of Paragraph 22 of the NPPF, which requires a vision of at least 30 years where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area. It should be noted that the Housing Secretary has now confirmed in writing to the Planning Inspectorate that planning practice guidance will be updated to explain the way local authorities should reflect the recent NPPF paragraph 22 changes in their local plans to ensure that plan preparation can continue at pace whilst also ensuring that the government's objectives are delivered.
- 4.3.2 The objectives of the plan are shaped around four themes: "more prosperous", "better places", "more accessible and "greener". There is an opportunity to embed the themes and objectives within the wider strategic context, to shape the role that Bedford Borough will play in delivering the emerging vision and ambitions for the wider Oxford-Cambridge Arc.

4.4 Growth and Spatial Options

- 4.4.1 A combined approach is needed in order to sustainably meet the challenge of delivering against identified development needs over the plan period to 2040. To meet housing need and capture the socio-economic benefits of the infrastructure associated with the Oxford-Cambridge Arc throughout the period to 2040 and beyond, proportionate levels of growth should be directed across the settlement hierarchy. This will complement growth from sustainable urban extensions and new settlements, ensure choice and competition in the market and those communities to improve their levels of sustainability. It will therefore be necessary for the housing requirements of neighbourhood areas to be revisited and/or for the Council to allocate land in these locations through the Local Plan Review. An approach that takes a pro-active approach towards enabling development in sustainable locations is required, which will include a combination of strategic scale sites and growth adjacent to existing settlements. Gladman are promoting land in locations including, Renhold, Shortstown, Willington and Wootton, all of which are well related to the existing built form and the A421 corridor and can be delivered as part of a sustainable and comprehensive strategy for growth across the borough to 2040.
- 4.4.2 The Planning Practice Guidance (PPG) highlights that *"A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness⁶."* All settlements within the borough boundary have the potential to contribute further towards the overall development requirement and there is a need to plan to ensure that services can be maintained and enhanced in these locations to meet the day to day needs of residents. A study of the sustainability credentials of settlements across the hierarchy should therefore be undertaken to fully explore the potential of these settlements to accommodate appropriate levels of growth, factoring in demographic information over the duration of the plan period and the availability of day-to-day services and facilities. Indeed, the NPPF 2019 sets out that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local

⁶ Reference ID: 67-009-20190722, Planning Practice Guidance

services⁷. Furthermore, the retention and development of accessible local services and community facilities should be enabled by planning policies and decisions⁸.

- 4.4.3 The spatial strategy, SA and site assessment scoring criteria must also fully recognise the sustainability benefits of village development and in doing so reflect the changing habits of people over the plan period including the increased role of working from home and the associated need for social and community infrastructure improvements in settlements across the hierarchy.
- 4.4.4 It is important that the local plan enables the delivery of a wide range of sites in order to support the delivery of housing at the levels that are required by the Standard Method. The approach should embrace the need to support sites of all sizes. It is important not to overly rely on large scale strategic locations for growth; by enabling the widest range of sites across settlements throughout the hierarchy, Bedford will maximise delivery and satisfy housing need in the borough.
- 4.4.5 As the Planning Practice Guidance (PPG) highlights, “A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness”⁹.
- 4.4.6 Whilst the Draft Plan explains correctly that work on the Local Plan 2040 should not be delayed in anticipation of the progression of the Oxford Cambridge Arc Spatial Framework, the plan making process represents an opportunity to fully explore a range of growth and spatial strategy options that will have the ability to support economic growth in a manner that aligns with the wider ambitions of the Oxford Cambridge Arc.

Renhold

- 4.4.7 Salph End, Renhold is less than half a mile from the Bedford Urban Area boundary and is therefore considered to be a suitable location for growth within each of the emerging

7 Paragraph 78, NPPF 2019

8 Paragraph 83, NPPF 2019

9 Reference ID: 67-009-20190722, Planning Practice Guidance

preferred options. Salph End was previously identified as a location suitable for growth in the region of 500 dwellings early stages of the adopted Bedford Local Plan 2030 without this being recognised in the final plan. No growth ended up being allocated here in the adopted Local Plan. Opportunities for growth in this location should be central to any strategy to meet the revised housing requirement over the period to 2040.

- 4.4.8 Through the Local Plan Review it would be appropriate for this previous recognition to be now realised with a proportionate amount of growth directed to Salph End as a component part of the spatial strategy within the Local Plan Review. The site Gladman is promoting in Salph End was previously a preferred option (Site 198) and is therefore a contender for allocation in the Local Plan Review.

Shortstown

- 4.4.9 Shortstown is well located close to the A421 corridor at the southern edge of the Bedford Urban Area with employment and recreational facilities close by. The village is defined as a 'Key Service Centre' comprising a good range of services and facilities and being well connected to larger town centres by public transport and cycling. It is acknowledged to be a sustainable location for growth within Bedford's existing settlement hierarchy and should play a central role in meeting the revised growth requirement to 2040. Gladman has submitted separate representations relating to Land off The High Road, Shortstown. The location of the site, to the north of the settlement would represent a logical extension in a location that is well related to the services and facilities in Shortstown and the Bedford Urban Area to the north.

Wootton

- 4.4.10 Wootton is a key service centre in the southern transport corridor where an element of further growth is being considered in 3 of the 4 preferred strategies. Gladman agree that further growth should be directed to Wootton through the Local Plan Review as no further growth is directed to Wootton as part of the adopted Bedford Local Plan 2030 due to existing commitments and completions at the start of the plan period.
- 4.4.11 Gladman recognise that the parish is preparing a neighbourhood plan but notwithstanding the outcomes of the pending examination, this should not dictate the emerging strategy for Wootton through the Local Plan Review which will cover an extended plan period and need to meet a greater housing requirement. Growth in Wootton should certainly form a

part of the strategy for the Local Plan Review, and as recognised through the site assessment work undertaken by the Wootton Neighbourhood Plan Steering Group, land at Hall End Road is a strong contender for allocation for residential development.

Willington

- 4.4.12 Willington is a designated rural service centre situated in the eastern transport corridor, which in one of the four preferred options being considered. Whichever strategy is ultimately carried forward, Willington is a sustainable settlement on the A421 corridor and can play a role in sustainably accommodating the level of growth needed in the Borough over the plan period. New homes and accessible open space in this location will also assist in sustaining and enhancing the services and facilities in the village as well as contributing to the local and affordable housing needs of the village and the Borough.

5 SITE SUBMISSION PROFILES

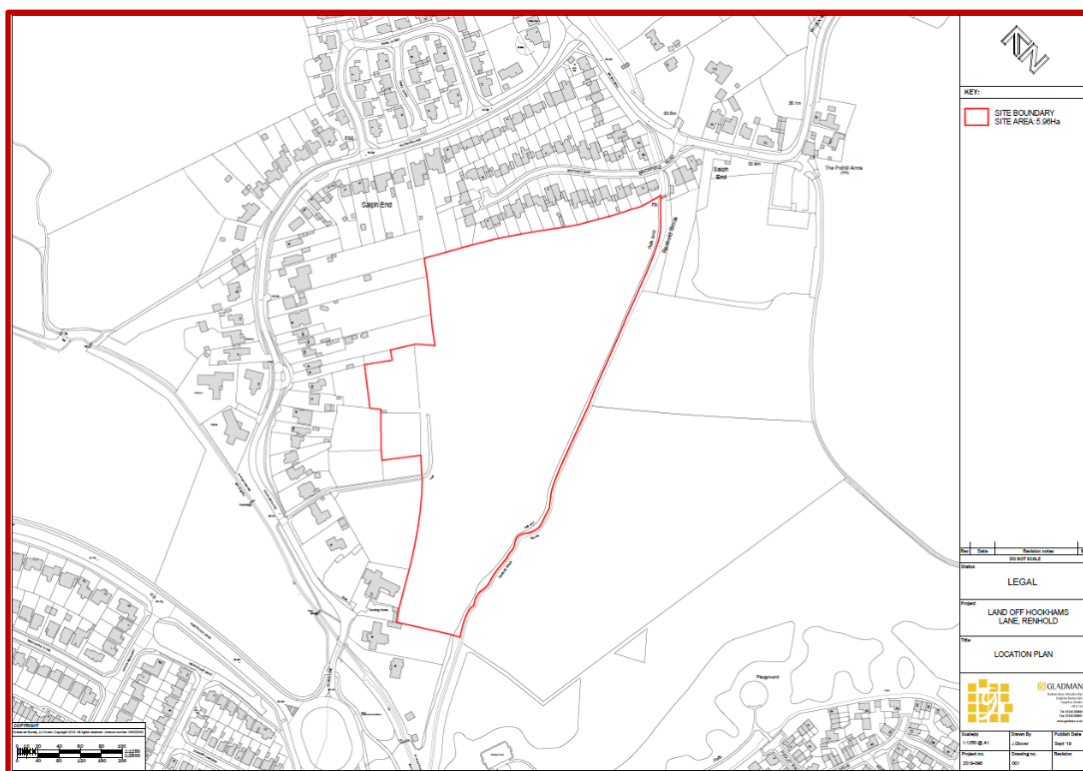
5.1 Site Allocations and Call for Sites

5.1.1 Gladman are promoting the following sites for consideration as housing allocations through the Local Plan 2040. Each of the sites is sustainably located adjacent to the existing settlement form with the potential to be brought forward for residential development within 0-5 years. The following locations were submitted during last year's Issues and Options consultation and represent suitable, available and achievable sites that can contribute towards the sustainable delivery of housing against the borough's growth needs during the plan period.

5.1.2 Noting the initial site assessment work that has been undertaken, these further submissions take note of where the Council has indicated that there is uncertain or insufficient information in order to support their further assessment as the plan making process continues.

5.2 Land off Hookhams Lane, Renhold (ID: 602)

5.2.1 Gladman are promoting Land off Hookhams Lane, Salph End, Renhold for residential development. The site promoted by Gladman measures approximately 5.93 hectares in size and can accommodate up to 110 dwellings. A location plan for the land being promoted is included below.



5.2.2 Gladman are in discussions with the adjacent landowners to the west, represented by Phillips Planning Services, regarding the potential to bring forward both parcels as a comprehensive scheme. This additional parcel measures 1.18 ha and is capable of delivering up to 30 dwellings. We are in the process of preparing a Vision brochure demonstrating how both sites could be brought forward together in a sustainable location close to the Bedford Urban Area.

5.2.3 Access is proposed to be taken from Hookhams Lane, this point of access was deemed to be acceptable in a previously refused application on the parcel to the west in October 2020 (Reference: 19/02194/MAO).

5.2.4 The parcel that Gladman are promoting is in agricultural use, with the site sloping gently from the west, with Renhold Brook forming the eastern site boundary. This will be a key

part of the proposals, providing a recreational route within the proposals but also access to the wider countryside. This would also help in ensuring development is kept out of area of flood risk on this boundary.

5.2.5 Salph End is a village on the edge of the Bedford Urban Area, benefitting from not only a local service provision within Salph End and Renhold but also further afield in the Bedford Urban Area itself.

5.2.6 The site is within safe walking and cycling distance with good footpath links to a number of key services and facilities with a semi-regular bus service also available from Hookhams Lane to allow a number of journeys to be completed using non-car modes of transport.

5.2.7 Gladman has considered Bedford Borough’s initial assessment of site 60z at Renhold, as well as adjacent land at site 68o. Please find information below to aid in further assessment.

Landscape Character

5.2.8 The site comprises a mixture of grassland and scrub in the northwest parcel and paddock in the south west. The eastern parcel comprises agricultural land. The site slopes gently from the west to Renhold brook on the eastern boundary. It is envisaged that the brook can from a key part of proposals ensuring enhancement to the Public Right of Way with improved linkages to the wider network, a key aim of saved local plan policy AD24. Taking into account the site conditions, site visibility and the nature of the development proposals assessed, it is felt that the site could be developed without causing significant or unacceptable harm to the landscape or result in an unacceptable visual impact.

Biodiversity, Green Open Space & Local Wildlife:

5.2.9 The site will be enhanced through an attractive landscaping scheme which includes extensive planting of trees and hedgerows both within the development, and along the boundaries. The proposal includes the provision of open space and play space within the site. Biodiversity will be enhanced through the provision of a 2m wide wildlife corridor. Gladman have undertaken preliminary ecological appraisal work at the site and can address the observations made in the Council’s initial site assessment work as follows:

- ***Whether the site is within or adjoining a site of nature conservation.***

The site is not within or adjoining a site of nature conservation.

- **Whether the site is within an area where protected species are known or likely to exist.**

The site is within an area where protected species are known or likely to exist. However, with the implementation of some straightforward mitigation and precautionary measures as proposed above, the development is not anticipated to result in any significant residual negative effects to important ecological features.

- **Is there potential to achieve a net gain in biodiversity.**

The site is dominated by arable habitat comprising a Pea monocrop, indicating that the proposed development is unlikely to result in significant adverse effects to ecological receptors. Furthermore, the retention and enhancement of current and new habitats/landscaping, open space and/or sustainable drainage features are likely to be capable of delivering Biodiversity Net Gain on-site.

- **Able to link into the green infrastructure opportunity network.**

The site currently lies outside the green infrastructure network as defined by the Bedford Green Infrastructure Plan (2009). It is however well located in relation to the public rights of way network (via route 12), which provides access by foot to a wide range of green infrastructure resources in the wider area. A Development Framework Plan for the site will be designed to retain, enhance and compensate all habitats of principal importance. Enhancement to species rich hedgerows, the retention and enhancement of the semi-improved grassland and the areas of green space around the site, will be positioned to extend the current network of linked habitat and maintain a significant biodiverse corridor to the wider area. This will serve to meet local BAP targets. It is deemed that with the implementation of some straightforward mitigation and precautionary measures, the development is not anticipated to result in any significant residual negative effects to important ecological features. A considered Development Framework Plan can deliver significant ecological mitigation and enhancements through the retention of linear features and the incorporation of species diverse grassland, SUDS features and tree planting.

Flooding and Drainage

- 5.2.10 Development will be kept away from the eastern boundary along the Renhold Brook corridor to ensure that areas at risk of flooding are avoided. An attenuation basin will be included within the site as part of the drainage strategy.

Archaeology and Heritage:

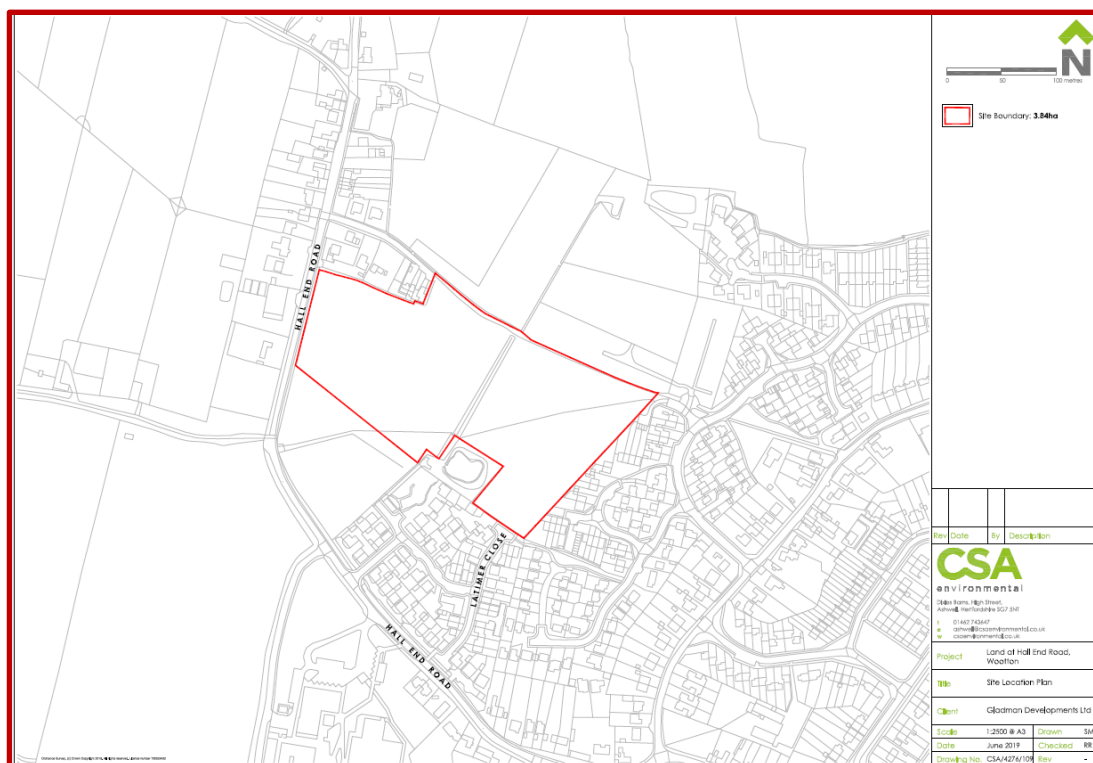
- 5.2.11 The Heritage England Map identifies that there are no heritage assets on or near to the site. Investigations to inform a previous application on adjacent land (site 680) concluded that there is a potential for an impact on archaeological remains, but this could be dealt with at planning application stage through condition. The same is expected to apply to site 602.

Highways

- 5.2.12 The site can be safely suitably accessed from a new priority junction off Hookhams Lane. As referred to above, when considering the previous application on part of the wider site (Reference: 19/02194/MAO) access was considered to be acceptable. No significant impacts from the development on the transport network in terms of capacity, congestion, and highway safety were raised and it is expected the same would be the case when accessing the wider land. Gladman would enact a travel plan that follows guidance from Bedford Borough and consultants in order to ensure increased usage of sustainable transport methods; this may include footpath widening, provision of or linkage to the cycle network, and contributions to increase the bus service on line 27, if deemed necessary.

5.3 Land North West of Hall End Road, Wootton (ID: 603)

- 5.3.1 Gladman are promoting Land North West of Hall End Road, Wootton for residential development. The site measures approximately 3.84 hectares in size and can accommodate around 90 dwellings. A location plan is included below.



- 5.3.2** The site comprises one pastoral field and part of another, separated by a newly installed ditch leading from the balancing pond of the adjacent development at Latimer Close.
- 5.3.3** The site can accommodate approximately 90 dwellings of mixed housing types and sizes designed to minimise impacts on nearby residents, heritage assets, landscape views and respecting the character of the local area. New Vehicular Access is indicated from Hall End Road with a number of pedestrian and cycle links to Hall End Road, the John Bunyan Trail and the National Cycle Route.
- 5.3.4** Existing vegetation will be retained as much as possible with additional planting throughout the site to create a landscape buffer and green corridor, alongside a large proportion of open space including a children’s play area for both new and existing residents.
- 5.3.5** Wootton is well-served by a range of services and facilities, the majority of which are within a 10 minutes walking distance of the Site. These include a primary school, a secondary school, library, village hall, public houses, convenience stores, post office and public houses. Wootton’s designation as a ‘Key services centre’ by the Bedford Borough Local Plan reflects the fact that it contains a good range of services and is well connected to larger town

centres by regular public transport to a number of nearby settlements, including Bedford and Milton Keynes

Biodiversity

5.3.6 Gladman’s ecologist has considered impact on biodiversity, as raised in Bedford Borough’s assessment of site 603 at Wootton. Other key points:

5.3.7 The site is not within or adjoining a site of nature conservation.

Whether the site is within an area where protected species are known or likely to exist.

5.3.8 The site is within an area where protected species are known or likely to exist. However, with the implementation of some straightforward mitigation and precautionary measures as proposed above, the development is not anticipated to result in any significant residual negative effects to important ecological features.

Is there potential to achieve a net gain in biodiversity.

5.3.9 Based on the biodiversity metric 3.0 calculations, the proposed development (inclusive of on-site intervention) would result in an overall gain. These gains can be evidenced through the ecological report, which can be shared with Bedford Borough, should they so wish. These are initial calculations and are subject to further changes.

Able to link into the green infrastructure opportunity network.

5.3.10 The site currently lies outside the green infrastructure network as per the Bedford Green Infrastructure Plan (2009). However, the Development Framework Plan has been designed to retain, enhance and compensate all habitats of principal importance. For example, the loss of 10-15m of hedgerow has been compensated with the planting of 290m of new species rich hedgerow.

5.3.11 These new hedgerows, the retention and enhancement of the wet ditch and the area of green space in the north section of the site, are positioned to extend the current network of linked habitat and maintain a significant biodiverse corridor to the wider area. This will serve to meet local BAP targets.

5.3.12 It is deemed that with the implementation of some straightforward mitigation and precautionary measures, as proposed above, the development is not anticipated to result in any significant residual negative effects to important ecological features. A considered

Development Framework Plan can deliver significant ecological mitigation and enhancements through the retention of linear features and the incorporation of species diverse grassland, SUDS features and tree planting.

Archaeology and Heritage

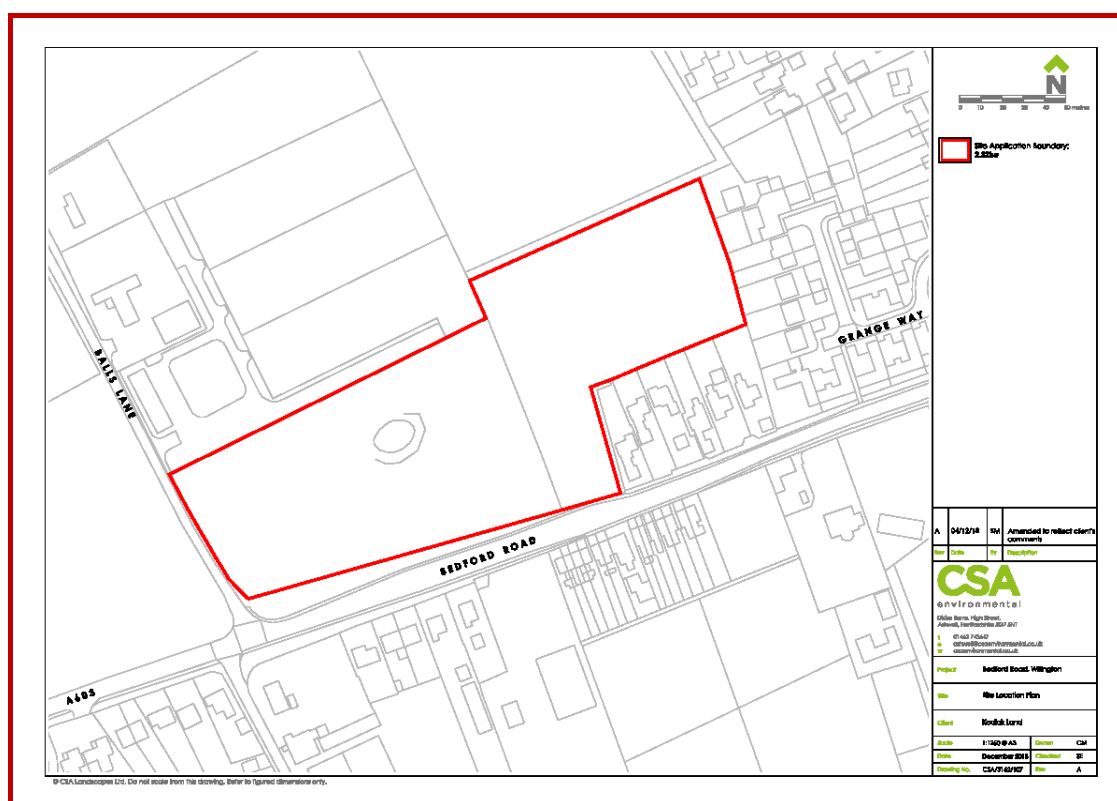
- 5.3.13 The Heritage England Map identifies that there are no heritage assets on or near to the site. The Wootton conservation area is not affected by the site.

Transport and Highways

- 5.3.14 In order to encourage sustainable transport, Gladman is open to considering the suggestions put forward by Bedford Borough, including the introduction of a pedestrian crossing, widening the existing footpath, and construction of a cycle lane. This is subject to a full transport assessment, as Bedford Borough identify, and any junction improvements recommended by highways consultants will be carried out to ensure safe and convenient access into and out of the site.

5.4 Land off Bedford Road Willington (ID:566)

- 5.4.1 Gladman are promoting Land off Bedford Road, Willington for residential development. The site is located to the south-west of the settlement, measures approximately 2.33 hectares in size and can accommodate around 46 dwellings.



5.4.2 The site comprises two large agricultural fields (currently used as horse paddocks) with boundaries formed of wooden post fencing, hedgerows and trees. A small pond lies in the centre of the western field. The site is bounded by open countryside and agricultural uses to the north, and to the west beyond Balls Lane. To the south beyond Bedford Road lies existing residential development, and existing residential development also abuts the site's eastern boundary. A public right of way crosses in a north/south trajectory within the eastern field.

5.4.3 The site lies adjacent to Willington which is a sustainable settlement with a range of services and facilities. The village shop and post office lies to the south of Bedford Road, adjacent to the site boundary. Within 2km of the site there is a primary school, public house, village hall, church, recreation ground and a large garden centre, along with blue infrastructure and recreational facilities at Danish Camp. All these facilities are easily accessible from the site via safe walking routes along footpaths adjoining well-lit highways.

5.4.4 Bedford Road is served by a busy bus route with half hourly Monday-Saturday daytime services to Sandy, Biggleswade and Bedford, which provide for a full range of higher order

services. Frequent onward rail connections to London and other destinations across the country are available from Bedford.

- 5.4.5 Willington is a sustainable settlement on the A421 corridor and can play an important role in sustainably contributing towards the level of growth needed in the Borough over the plan period. New homes and accessible open space in this location will also assist in sustaining and enhancing the services and facilities in the village as well as contributing to the local and affordable housing needs of the village and the Borough.
- 5.4.6 An Ecological Impact Assessment has previously been carried out to assess the proposed development of the site and its potential impacts on important ecological features as part of planning application 18/03161/MAO. To inform this assessment a desk study and range of field surveys were undertaken. The conclusion of this work is that no impacts are predicted in respect of nature conservation designations.
- 5.4.7 The Site is dominated by horse-grazed paddocks, comprising semi-improved grassland currently in unfavourable condition. The site can be developed in a manner that retains areas of grassland, bringing them into more favourable condition through sensitive management and proposed enhancement works. The development of the site would include the retention of important biodiversity features and the creation of new habitats.
- 5.4.8 A population of great crested newts has been recorded making use of a pond located to the centre of the site. Following consultation with Natural England, principles of mitigation can be established to safeguard this population alongside development, as well as to deliver wider enhancements for biodiversity. Such mitigation works would also safeguard a population of common lizards and an 'outlier' badger sett, both recorded at the Site. Based on successful implementation of mitigation, compensation and enhancement, the development of the site would accord with all relevant nature conservation legislation.
- 5.4.9 The site can be developed within a strong Green Infrastructure Framework that would enable the enhancement of landscape features and create new areas of planting to provide ecology and wildlife benefits. Existing Public Footpath - FP9 can be integrated within the open space provision within the site and provide linkages to the wider Green Infrastructure network and the existing built form of Willington.

6 CONCLUSIONS

6.1 Summary

- 6.1.1** Gladman welcomes the opportunity to comment on the issues and options that are currently being explored by the Council. These representations have been drafted with reference to the revised National Planning Policy Framework (2021) and Planning Practice Guidance.
- 6.1.2** Gladman have provided comments on several issues that have been identified in the Council’s consultation material and recommend that the matters raised are carefully explored during the process of undertaking the Borough Plan Review. In particular, we submit that there are a wide range of settlements in the Borough that are able to positively contribute towards a sustainable strategy for accommodating the increased growth requirements over the period to 2040, including Renhold (Salph End), Shortstown, Wootton and Willington.
- 6.1.3** We hope you have found these representations informative and useful towards the preparation of the Local Plan 2040 and Gladman welcome any future engagement with the Council to discuss the considerations set out within this representation.

