



# Bedford Local Plan 2040 – Draft Plan Strategy Options and Draft Policies Consultation

Representations for Hollins Strategic Land LLP



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Policies Consultation  
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## 1. Introduction

- 1.1 Emery Planning is instructed to submit representations to the Bedford Local Plan 2040 – Draft Plan Strategy Options and Draft Policies Consultation on behalf of Hollins Strategic Land (hereafter referred to as 'HSL'). HSL have an interest in land west of Hall End Road, Bedford. The extent of HSL's interest is shown on the site location plan appended at **EP1** and we promote it for allocation as it is a sustainable and logical choice for an allocation in order to meet the identified development needs in a higher-order settlement close to Bedford town. The proposed masterplan is appended at **EP2**.

## 2. Plan Period

- 2.1 With regard to the plan period the Council will need to consider paragraph 22 of the Framework which was published after the start of the consultation. It states:

*“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”*

- 2.2 At this stage there are no allocations to assess paragraph 22 against but it is clear from the options set out (2a, 2b, 2c and 2d) that a significant level of development required and new settlements and/or significant extensions to existing villages and towns will form the strategy for the area.
- 2.3 A further point on why the plan period should be extended to 2050 is the consultation on the Arc Spatial Framework. Paragraphs 1.9 and 1.10 of the consultation paper for LP2040 states:

*“1.9 In response to this delay, some local authorities in the Arc have adjusted their local plan production timetables so that planning activity follows the development of the Arc Spatial Framework in order to create a more joined up process. Government however has urged Councils in the Arc to carry on with plan-making and, in Bedford Borough's case, the consequences of not doing so could be significant for the reasons relating to policies becoming “out of date” described above; so preparation of this local plan must continue. The relationship between the local plan timetable and the published timetable for the preparation of the Arc Spatial Framework is shown below.*

*1.10 Whilst this local plan will progress alongside the development of the Spatial Framework it shares many of the overarching principles relating to economic growth and the natural environment. In these respects, the two will be aligned."*

- 2.4 We agree that LP2040 should progress and not be delayed by the Arc Spatial Framework, but we do question whether the two plans will be aligned on the key matters, one of which is the plan period with the Arc Spatial Framework planning to 2050 yet the LP2040 to 2040. We consider that this is a further reason for planning up to 2050 to now be adopted.

### **3. Housing Requirement**

- 3.1 The consultation paper sets out the result of the standard method which is 1,275 new homes per annum between 2020 and 2040 which means that after taking account of 13,000 dwellings committed, the new local plan will need to allocate land to provide a minimum of 12,500 new dwellings.
- 3.2 Paragraph 7.3 of the Sustainability Appraisal Report states a higher growth figure should be considered of LHN plus 10%. It states:

*"In considering reasonable alternatives for the amount of housing growth to be provided in the local plan, a lower figure than 12,500 dwellings (or no growth) is not a realistic option because of the National Planning Policy Framework requirement for local plans to meet assessed needs in accordance with the standard method. However this is a minimum number and a higher growth figure should be considered for the purposes of sustainability appraisal testing. In the absence of any methodology for calculating a higher alternative figure, a 10% uplift to the local housing need assessment is proposed. This would give a requirement for 1,403 dwellings per year and a total of 28,060 dwellings over the plan period. After commitments are deducted, 15,060 dwellings would need to be allocated."*

- 3.3 We endorse this need for a buffer of at least 10%, but it has not been carried forward into the consultation paper and the options put forward. Whilst we agree that there should be a minimum 10% flexibility, we consider there should be a buffer of 20% which is based on the Local Plans Expert Group report to the Communities Secretary and to the Minister of Housing and Planning in March 2016. The report recommends at paragraph 11.4 that the Framework should make clear that local plans should be required to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term, plus make provision for, and provide a mechanism for the release of, sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the Framework.

- 3.4 As the plan moves forward a buffer of 20% is essential given that some of the growth is reliant on made neighbourhood plans and from experience across the county issues arise on the timing of delivery on allocated sites. As we set out below it would also assist with the economic aims of the Arc and deliver much needed affordable homes in Bedford to meet a significant need.

### **Stepped Requirements**

- 3.5 The Plan suggests that a stepped requirement is being considered. It states:

*"Whilst more detailed work will be needed to determine this, we will consider whether, given the significant investment in infrastructure which would be necessary to deliver development in the borough at scale, a stepped trajectory approach may be appropriate for this plan. This could mean, for example, that the delivery target could be kept at 970 per year until 2030 and then increased to 1,580 dwellings per year to make up the rest of the plan requirement over the remaining 10 years. By 2030 the Black Cat Junction improvements will be complete, the East West Rail section through Bedford Borough will be complete (including new and re-modelled stations) and sufficient lead-in time will have been available for strategic projects to be planned in detail, enabling these higher numbers to be achieved. The forward planning will include arrangements for new sustainable travel links, with the intention that these are available from day one in order to embed and promote sustainable travel choices."*

- 3.6 We are not against a stepped requirement given the scale of development and the timing of infrastructure being delivered. However, we consider that the Council must consider the potential for small and medium sized sites which are not reliant on strategic infrastructure that can deliver early in the plan period as sustainable extensions to towns and villages rather than pursuing the stepped requirement at this stage. If a stepped requirement is required, then it should be based on a trajectory that factors in early delivery on small and medium sized sites and larger allocations which so not require that new infrastructure. The imperative should be to meet the housing needs sooner and any stepped requirement should be for new settlements only if they form part of the strategy going forward. At this stage the presumption should be to plan for 1,275 dwellings per annum on adoption with monitoring provisions to allow for sites to be brought forward earlier if delivery does not keep pace with requirement. Housing completions in the recent past suggest that delivery of 1,275 is achievable in the market with 1,350 dwellings and 1,359 dwellings being completed in 2017-18 and 2018-19 respectively.

## Should there be an uplift of Housing Requirement?

3.7 Paragraph 61 of the Framework states:

*“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”*

3.8 Paragraph 2a-010 of the National Planning Practice Guidance (NPPG) states:

***“When might it be appropriate to plan for a higher housing need figure than the standard method indicates?”***

*The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.*

*This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

*There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities are encouraged to make as much use as possible of previously-developed or brownfield land, and therefore cities and urban centres, not only those subject to the cities and*

*urban centres uplift may strive to plan for more home. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests."*

- 3.9 As set out above, the minimum local housing need figure under the standard methodology is 1,275 new homes a year for the period 2020-2040. This is a total of 25,500 homes. After taking account of the existing commitments, the Plan seeks to make provision for 12,500 homes over the plan period to 2040. However, there should be a critical assessment of the supply undertaken to ensure that the Submission Plan allocates sufficient land to meet the housing requirement and that over-estimation of existing commitment delivery does not result in under-estimation of new allocations. That assessment should be consulted upon prior to the Submission Plan being prepared and consulted upon.

#### Arc Spatial Framework

- 3.10 As noted in paragraph 1.8 of the consultation document, in February 2021 the Government published a policy paper entitled 'Planning for sustainable growth in the Oxford-Cambridge Arc: an introduction to the spatial framework'. They are now consulting on "Creating a vision for the Oxford-Cambridge Arc" which ends on 12th October 2021. The consultation states that its purpose is:

*"Creating a Vision for the Oxford-Cambridge Arc', sets out the government's first public consultation on the Oxford-Cambridge Arc Spatial Framework. We are seeking views to help us create a vision for the Oxford-Cambridge Arc Spatial Framework, and in doing so guide the future growth of the area to 2050."*

- 3.11 A number of points arise.

- 3.12 Paragraph 5.5 of the Arc Spatial Framework states:

*5.5 We are concerned about the affordability and availability of housing in the Arc, and what this will mean for the Arc's communities, economy and environment. Development of new homes is already happening in the Arc, but in the main centres this has not kept up with need. We also know people are being priced out of the area, increasing the need to make more polluting journeys for work and leisure, and making home ownership less likely for many. And we have heard concerns about the quality and sustainability of new development.*

- 3.13 Paragraph 5.7 states:



5.7 We will also seek to set policies to enable:

- new development to come forward at the scale and speed needed, in sustainable locations, with a focus on brownfield redevelopment;
- new development to support the recovery of nature, new green space that can be accessed by all, resilience to climate change, and protection of highly valued existing green space; and
- housing needs to be met in full, including much-needed affordable housing.

3.14 Paragraph 5.8 states:

*“5.8 In parallel to the development of the Spatial Framework, the government is also exploring options to speed up new housing and infrastructure development in the Arc to help meet its ambitions, where evidence supports it. This includes examining (and where appropriate, developing) the case for new and/or expanded settlements in the Arc, including options informed by possible East West Rail stations between Bedford and Cambridge and growth options at Cambridge itself. The government will undertake additional Arc consultations on any specific proposals for such options as appropriate. The Spatial Framework will guide the future growth of the Arc to 2050, including on the question of new housing and infrastructure and will, as part of its development, take into consideration any significant new housing and infrastructure coming forward to meet the Arc’s ambition.”*

3.15 It is clear that the Arc Spatial Framework will impact on Bedford and the scale of housing. It is too early to give significant weight to the Arc Spatial Framework but as the emerging LP2040 is being prepared in parallel with it and “shares many of the overarching principles relating to economic growth and the natural environment”, then planning for an additional 20% of housing not only provides the necessary flexibility required but will also provide homes to meet the economic ambitions of the Arc Spatial Framework.

#### Affordable Homes

3.16 In the case of Bedford, paragraph 5.52 of the Local Housing Needs Assessment (LHNA) states that the affordable needs is 691 dwellings per annum which “represents a substantial proportion of the annual growth of 771 households per annum identified by the ONS 2018-based household projections for the LHN period 2020-2030 (10-year variant, Figure 33)”<sup>1</sup>. It represents 54% of the standard method figure.

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<sup>1</sup> Paragraph 5.53 of the LHNA

3.17 The Standard Method does not assess the affordable housing needs in each LPA area as the PPG<sup>2</sup> confirms where it states:

**"An affordability adjustment is applied as household growth on its own is insufficient as an indicator of future housing need because:**

*household formation is constrained to the supply of available properties – new households cannot form if there is nowhere for them to live; and*

*people may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford.*

*The affordability adjustment is applied in order to ensure that the standard **method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes.** (our emphasis)*

3.18 Paragraph: 010 Reference ID: 2a-010-20190220 states:

*"Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- **an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;***

*There may, occasionally, **also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.** (our emphasis)*

3.19 In the case of Bedford, Step 1 of the Standard Method is 980 dwellings per annum, with Step 2 increasing it to 1,275 dwellings. The affordability uplift is therefore 295 homes, which is significantly

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<sup>2</sup> Paragraph: 006 Reference ID: 2a-006-20190220

below the 691 affordable homes in the LHNA. This is because the affordability ratio as a long-term adjustment to house prices which can only be seen at the end of the plan period and is not meeting those 691 households in need per annum now and throughout the plan period. Therefore, we consider the Council should apply an uplift to meet affordable housing needs.

3.20 To conclude, our position is that the requirement should be treated as a minimum and a flexibility percentage should be considered and in the order of 20%. This would give a reasonable degree of security that should sites not deliver at the rates anticipated it will:

- Help ensure there is a robust five-year housing land supply;
- deliver a greater level of affordable housing in line with the LHNA;
- deliver homes to meet the economic ambition of the Arch Spatial Framework.

## 4. Spatial Options

4.1 We have summarised the four options in the table below.

	2A	2B	2C	2D
Within the urban area	1,500	1,500	1,500	1,500
Adjoining the urban area	1,500	1,500	1,500	1,500
Transport corridor – rail based growth	7,500	5,500	3,915	5,500
Transport corridor – south	2,000	1,500	0	750
Transport corridor – east	0	0	0	750
New settlement/s	0	2,500 or 3,085	5,585	2,500 or 3,085
Total	12,500	12,500 and 13,085	12,500	12,500 and 13,085

4.2 Our first concern is that none of the four options deliver LHN+10% (15,060 dwellings). The Table in 7.14 of the draft SA shows that whilst two (Options 3a and 6) come closer to meeting that requirement by delivering 14,480 dwellings it is still not meeting LHN+10%.

4.3 Our second concern is that new settlements form part of the strategy in 3 of the 4 options. However, paragraph 2.6 of the Development Strategy Topic Paper states:

*"The results are reported in full in the Issues & Options Consultation - summary and responses document and the key point was that the (brown) urban, (yellow) A421 and (pink) rail-based growth development locations were the most strongly supported and were twice as likely to be selected as suitable locations for growth as dispersed and new settlement based growth.*

4.4 Therefore, the results of the Issues and Options showed that the options for new settlements and dispersed growth were most unpopular. Despite this, they formed part of 9 of the 13 options in the draft SA, and 3 of 4 preferred options in the consultation paper. We question the merit in undertaking consultation at the Issues and Options when at this early stage in LP2040 no meaningful account has been given to the public responses.

4.5 The third is that paragraph 3.11 recognises that urban growth comes with deliverability issues and significant investment and the level of development in each of the 4 options for the urban area are a constant. In that context paragraph 3.6 is clear where it states that:

*"the urban area and adjoining urban area perform the best, particularly because of reducing carbon emissions and reducing travel".*

4.6 Therefore, development in and adjacent to urban areas performs best, yet paragraph 3.7 states:

*"The worst performing component was the village related growth component. It was likely to have a more negative effect than the other components, particularly in relation to reducing carbon dioxide emissions, protecting water resources, and reducing the need to travel and promoting sustainable modes of travel. It was likely to have fewer positive effects than any of the other components of growth."*

4.7 This conclusion must be read in the context that the Development Strategy Topic Paper which has a Village Related Growth Option were all based on over 4,000 new homes ranging from 29% to 47% of the total requirement. We do not advocate such a dispersal strategy but clearly recommend that there should be growth at Key Service Villages and Rural Service Centres.

4.8 Therefore the options should have assessed a lower total percentage of the total requirement for the Village Related Growth Option and also distinguished between Key Service Centres and smaller villages, particularly for Wootton which lies close to Bedford town and close to Milton Keynes. Whilst other villages may be more remote with fewer facilities, more realistic options/s for growth at Key Service Centres and Rural Service Centres should have been considered.

4.9 The fourth is that we note that of the 4 preferred options; 3 of which include growth in certain parishes. These are Options 2a (2,000 dwellings), 2b (1,500 dwellings), 2d (750 dwellings). We note

that these options state within the parish area rather than within or adjacent to parish settlement. Paragraph 3.12 states that “*development in parishes within the ‘Transport corridor’... “will not necessarily adjoin existing villages but could be at new locations between a parish”*”. Development on the edge of existing settlements, and closer to services, are important factors and we consider that the Plan needs to clarify development within a Parish should be located adjacent to settlement boundaries of existing settlements as that is the most sustainable option.

4.10 This would also meet the aims and objectives in the Framework, for example;

- Para 16: “Plans should: a) be prepared with the objective of contributing to the achievement of sustainable development”;
- Para 79: “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. **Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.** Where there are groups of smaller settlements, development in one village may support services in a village nearby”. (our emphasis)

4.11 The fifth concern is that the LHN Assessment has been published but there has been no assessment of housing market areas and commuting patterns to help inform strategy and location of growth. Generally, Bedford borough has a strong geographical association with Milton Keynes to the south-west and Central Bedfordshire to the south. This was recognised in the SHMA (2018) where Bedford is within the Milton Keynes HMA and a commuting association with Central Bedfordshire. This context should inform the location for new growth in a sustainable way. Instead, the preferred options appear to focus growth with new settlements in the northeast of the borough which the SHMA (2018) suggested was closer/within the Huntingdon HMA. We are concerned that this approach may exacerbate unsustainable travel patterns particularly where housing growth in more remote parts of the borough may force residents to take longer journeys into Bedford town for jobs. Higher-order settlements closer to Bedford town should be prioritised for housing growth in preference to more remote areas.

4.12 The sixth is that it is Intended that if the favoured strategy involves additional development in and around villages, that parish councils will be asked to allocate land in accordance with LP2040. This is for non-strategic scale sites but if this is carried forward into LP2040, then each Parish should be given a housing requirement as required by paragraph 66 of the Framework which states:

*“66. Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. **Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.** Once the strategic policies have been adopted, these figures should not need retesting at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.” (our emphasis)*

4.13 In light of the above we answer paragraph 3.17 which asks:

*“If you think that there are other strategies we should be considering, please let us know. These may be ones set out in the Development Strategy Topic Paper or completely different alternatives.”*

4.14 We consider there are reasonable alternatives that should be considered. They are:

- (1) greater growth in larger villages including Key Service Villages alongside urban growth and transport corridor growth.
- (2) an expansion of Option 6, with more growth in Key Service Villages, and to include urban growth.

4.15 Both these options should distinguish between larger more sustainable villages (KSCs and RSCs) and smaller ones. In the evidence base there is the Settlement Hierarchy Paper dated September 2018 although we note that there is a “review underway” and is one of the documents “not yet available for comment, but will be finalised in order to support the plan for submission (2022)”. It is important that this is the subject of consultation prior to the Submission Plan being published so that any issues are considered prior to the spatial strategy evolving and reducing any potential objections to a key part of LP2040.

4.16 Our specific interest is Wootton which is one of the 8 Key Service Centres. Policy 4S of the LP2030 sets out the aim to deliver 970 dwellings per annum across the borough, with a minimum of 3,169 dwellings to be distributed across the various settlements. Part iv states that a minimum of 2,000 dwellings should be located at Key Service Centres of which Wootton is one. The policy then continues when it states:

*“it will be necessary to identify sites to meet the following levels of development, generally in and around defined Settlement Policy Area boundaries. Other than*

*in Roxton, all sites will be allocated in Neighbourhood Development Plans. In rural service centres allocations may exceed 50 dwellings where specific local justification is set out in Neighbourhood Plans demonstrating that it would be appropriate in terms of the scale, structure, form and character of the settlement and the capacity of local infrastructure"*

4.17 Criteria xi to xvi then set out a specific housing requirement for each settlement. However, there is no specific requirement proposed for Wootton. This was explained in the 2017 version of the LP2030 because Wootton had expanded in recent years. This should not be seen as further development at Wootton not being appropriate; rather it confirms its suitability and capacity as a location for growth. We consider that going forward Wootton should be identified as a location for growth and given a specific requirement. This should be at least 500 dwellings as set out in Options 3b, 3c, 4, 5 and 6. That should not mean that all other Key Service Centres are also required to deliver 500 dwellings as they are already required to deliver 500 dwellings in LP2030 and form part of the committed 13,000 dwellings. These settlements could get less or as was the case at Wootton zero in LP2030 as LP2040 progresses. What is clear is that Wootton should have a specific requirement of at least 500 dwellings especially due to its sustainability credentials and its close relationship to Bedford town.

4.18 Indeed paragraph 2.8 of the committee report of Application 19/00894/MAO (land west of Wootton Upper School) the LPA states:

*"2.8 Despite the lack of allocation for Wootton, this does not mean that development should not occur."*

4.19 In that context, Policy W2 of the emerging Wootton Neighbourhood Plan states:

*"Provision will be made over the plan period for up to 105 homes as proposed within site specific policies W3 to W6. Development in excess of this figure will only be permitted where the proposal relates to a site within the SPA in accordance with Policy W1."*

4.20 That plan is to 2030, yet is not meeting the full need as explained in paragraph 60 of the Wootton Neighbourhood Plan which states:

*"Public consultation was carried out in June/July 2018 on the proposed scale of development in the WNDP, with 73% of respondents strongly agreeing/agreeing with the allocation of sites sufficient to accommodate a total of 145 residential units within the plan period, on the basis of need ascertained by the Housing Needs Survey. This survey aimed to assess the need of local people for either affordable housing or market housing in Wootton, at the time when it was envisaged that the Bedford Borough Local Plan would*



*cover the period to 2035. The quantum of development has been marginally reduced in response to further resident feedback and to reflect the reduced Local Plan period to 2030."*

4.21 Therefore, the housing need from the evidence base is 145 dwellings. It should be noted that the 105 homes proposed in Policy W2 is seeking to address existing and potential housing needs of the **existing** residents of Wootton and it takes no account of the newly forming households and the increase in households in the plan period across Bedford that the standard method calculates. This is a particularly important point as the LP2040 consultation confirms that capacity within Bedford town for housing is limited and the Plan will rely on growth outside of this to meet needs of which Wootton can play an important role. However, it demonstrates a continuing need for new housing in Wootton which LP2040 should plan to meet.

4.22 To conclude, there should be changes to the Spatial Options and we propose:

- A greater level of housing to be planned for of LHN+20%;
- Greater recognition of the housing market areas and extensions to existing established settlements with closer relationships to Bedford town should be prioritised;
- Clarity that extensions to Key Service Centres and other sustainable villages form part of the strategy. This may be a refinement of the transport corridor criteria or a specific requirement as set out in part iv and v of Policy 4S of LP2030; and,
- Each neighbourhood plan area to have a requirement set out. For Wootton we consider at least 500 dwellings.

## **5. Land west of Hall End Road, Wootton (Site ID371)**

5.1 We set out below an overview of the site HSL are promoting for residential development in Wootton for up to 81 homes.

### **Site Location and Description**

5.2 The site is generally rectangular shape, on the edge of the western built-up area of Wootton, which lies south west of Bedford. The site, as identified by the red line boundary, covers approximately 6.5 hectares (ha) or 16 acres.

5.3 The northern edge of the site is defined by Hall End Road (also National Cycle Route 51) and the John Bunyan Trail. There is a field access gate to the northeast corner of the site. From this direction, the settlement of Wootton has recently been expanded towards the site with the construction of 58 dwellings (Ref: 14/02939/MAF) (Allocation AD2) and is a prominent feature. An allocation for a school extension is also located north east of the site on the opposite side of Hall End Road and is yet to be implemented and extends the settlement edge outwards.

5.4 The eastern boundary runs alongside an unnamed road that provides access to Wootton Upper School and commercial/ farm premises. The southern boundary is contiguous with Wootton Wood, an area of ancient and semi-natural woodland. The western boundary is shared with an adjacent field, laid to pasture. These boundaries are all formed from native hedgerow with a combination of post and rail or post and wire fencing within.

### **Sustainable and Suitable Location**

5.5 The village centre of Wootton is located approximately 900 metres to the east of the site. The village benefits from many amenities including local convenience stores, pubs and restaurants, several churches, a petrol station, pharmacy, public library and football club. The wider parts of the village contain community services such as the village hall, memorial hall, play areas, skate park and tennis courts.

5.6 In terms of transport links, bus services serve Wootton and can be accessed within a short walk of the site. These services provide regular daily services to destinations such as Bedford, Milton Keynes and other local villages, providing residents with the opportunity to access a wide range

of employment, shopping, leisure and cultural opportunities without having to rely upon the private car. The site location therefore would accord with NPPF §109.

- 5.7 The Environment Agency Flood Maps show the appraisal site lies entirely within Flood Zone 1 indicating it has a low probability of flooding and is suitable for residential uses.
- 5.8 The village of Wootton has a historic character, with buildings and monuments dating from as early as the 14th Century. Wootton Church End Conservation Area is located approximately 250 metres to the east of the appraisal site and encompasses the Grade I listed Church of St. Mary and several other listed buildings. These heritage assets are separated from the site by Wootton Upper School and so development of the site would not have a negative impact upon their setting. The westernmost part of the site is within an Archaeological Interest Site. The LPA also agreed in the committee report (**see EP4**).

### **The Proposed Development**

- 5.9 This proposal submitted to the LPA sought outline planning permission for the construction of up to 81 dwellings with access. The final layout, scale, landscaping and appearance would be the subject of a reserved matters application. The proposed illustrative site layout and Design and Access Statement submitted with the application shows how the dwellings could be comfortably accommodated on the site along with open space and the conserved and managed meadow. These are enclosed as **Appendix EP2**.
- 5.10 All of the proposed dwellings within the site would be served by a single access road which would be taken from Hall End Road. The main internal access road is shown and the precise details would form part of the reserved matters application. Pedestrian and cycle connectivity can be explored at the reserved matters stage.
- 5.11 The TA states that the proposed site is situated approximately 950m west of Wootton village centre, and coupled with the site's proximity to frequently serviced bus stops, cycle routes and viability to access the nearest rail station, accessibility from the site is considered to be of a good standard with opportunities to promote sustainable travel from the site. A Travel Plan was also submitted with the application to help promote more sustainable choices of travel.

## The Application and Appeal

- 5.12 Following their consideration of the proposal, the professional officers of the Council concluded that planning permission should be granted and recommended this to the planning committee on 28<sup>th</sup> October 2019. The application was deferred for a site visit and it was considered again on the 25<sup>th</sup> November (**Appendix EP3**). The members of the Planning Committee voted to refuse the application solely on highway grounds contrary to the advice of the planning and highway officers.
- 5.13 The committee report sets out the detailed 22 planning considerations that were examined and the planning officer was informed by statutory and non-statutory consultees and other consultation letters during the determination period with the conclusion that permission should be granted.
- 5.14 An appeal was submitted and determined. However, following a High Court challenge the Inspector's decision on the appeal dated 15 September 2020 was quashed and the Court has ordered that the appeal be re-determined. The proposal has the following benefits:
- the delivery of open market housing to assist in boosting the supply of housing in Bedford and can meet the 145 homes identified in the evidence base for the WNP as well as borough housing needs;
  - delivery of a medium sized site by HSL who have a proven track record of delivery which would accord with the clear objective of the Government in paragraph 69 of the Framework.
  - the development accords with the spatial strategy as expressed in Policy 3S of the Local Plan which identifies Wootton as a Key Service Centre which can accommodate strategic residential development in a sustainable location.
  - the proposed development helps to meet the objectives set out in the Bedford Green Infrastructure Plan (2009) and the provision of open space to meet the needs of existing and proposed residents and maintain a Green Corridor as required by saved policy AD24.
  - residential development at the site through the proposed scheme will result in an improvement to the biodiversity value of the site and the net gain benefits to be achieved and secured by the scheme outweigh the estimated loss of c. 3.1 hectares of the neutral grassland at the CWS to achieve compliance with the paragraph 180(c) of the Framework.
  - the delivery of 30% affordable housing accords with Policy CP8 and would assist in addressing the very significant and persistent shortfall in affordable housing delivery. Paragraphs 4.23 to 4.30 of the Application Planning Statement confirm that there is a

shortfall of 552 affordable homes since 2003 and the need going forward is 278 affordable homes per annum. There is also a need for 24 affordable homes as set out in the Housing Needs Survey.

- highway works that will improve highway safety; and;
- a range of social and economic benefits and increase spending for local services and facilities.

5.15 In the Site Assessment Pro-Formas June 2021 the subject site is Site ID 371. However the assessment does not take account of the Officers Report to committee for the application and HSL sent an email to the LPA on 2<sup>nd</sup> August 2021 setting out our comments which were noted in an email dated 11<sup>th</sup> August 2021. The email exchange is **Appendix EP4**. The site is deliverable.

5.16 Our position is that the site can be delivered in full in the first five years of the plan period. This is because the land is controlled by HSL, an experienced land promotion company complete with its own housebuilding division. The site is controlled by a willing landowner, and there are no legal or ownership issues that would prevent development. **Appendix EP5** is a summary of the delivery record of HSL in recent years. The Council can proceed in the confidence that the site is deliverable and can be delivered in the first 5 years of the housing land supply and should be allocated on that basis.

5.17 To conclude, with the need for further housing to meet the requirement to 2040 we request that the site is proposed for allocation. We would welcome discussions with the LPA on what the site can offer so that a deliverable site can be allocated to meet the housing needs in the first 5 years of the plan period. HSL has a good track record in seeking to positively engage with communities preparing neighbourhood plans as they have done with the Willington neighbourhood planning group in Bedford on their land at Sandy Road. That NP is now at examination stage with HSL land allocated for up to 50 dwellings to meet local needs alongside a range of community benefits and HSL have a planning application pending. HSL undertook technical survey work to help inform the NPG as they consulted with the community, which resulted in the allocation of the site for development with the support of the local community and Parish Council.

5.18 This concludes our representations.

## 6. Appendices

- EP1. Site Location Plan
- EP2. Masterplan and Design and Access Statement
- EP3. Committee Report
- EP4. Email exchange re Site 371
- EP5. HSL Delivery Record

EP1



Track

48.4m

Wootton Upper School

Tennis Courts

Pond

ROSEBERG

BURRAV



Project Land south of Hall End Road, Wootton

Title Location Plan

Date 18.04.19

Scale 1:1250

Drawn by CO

Drg. No. LP1001 revA



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EP2



# Land at Hall End Road, Wootton

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## Design and Access Statement





This document has been prepared by:



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April 2019 Document Revision A

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# Introduction

## Vision

The overall vision for the site is to provide a distinctive and high quality place, which has been ecology and landscape-led, and complements the qualities and character of Wootton.

The development will create up to 81 dwellings with a range of housing to meet the needs of the borough, whilst respecting and enhancing the site's environmental assets. Housing will be set within a robust network of green infrastructure, which will help to integrate development within the landscape and create a distinctive sense of place.

The design will be inspired by the character and detail found within Wootton and the surrounding villages. An Illustrative Masterplan provides an option for how the site could be developed. The precise design and layout of the proposed development would be provided at the reserved matters stage.

## Foreword

Hollins Strategic Land (HSL) have prepared this Design and Access Statement (DAS) which accompanies an outline planning application for a sustainable ecological and landscape-led residential development of up to 81 dwellings west of Wootton, Bedfordshire.

This DAS has been prepared with assistance from the consultant team and in accordance with the requirements of local and national guidance. Accordingly, the DAS describes the context for the development and the way in which the proposals have been resolved through an understanding of the setting, scale, massing, the interrelationship to surroundings of old and new development, access and movement, and consultation. The DAS summarises the extensive design process and considerations that have been taken into account in developing the proposals. Hollins Strategic Land are committed to ensuring the development of the site as a high quality scheme and a modest, sensitive residential extension to Wootton.

This document should be read alongside the other documents accompanying the planning application.

## Guidance

The Planning Practice Guidance (PPG) was adopted on 6th March 2014. The PPG provide the following guidance on Design and Access Statements:

### What is a Design and Access Statement?

*A Design and Access Statement is a concise report accompanying certain applications for planning permission and applications for listed building consent. It provides a framework for applicants to explain how the proposed development is a suitable response to the site and its setting, and demonstrates that it can be adequately accessed by prospective users. Design and Access Statements can aid decision-making by enabling local planning authorities and third parties to better understand the analysis that has underpinned the design of a development proposal.*

*The level of detail in a Design and Access Statement should be proportionate to the complexity of the application, but should not be long.*

### A Design and Access Statement must:

*a) Explain the design principles and concepts that have been applied to the proposed development; and*

*b) Demonstrate the steps taken to appraise the context of the proposed development, and how the design of the development takes that context into account.*

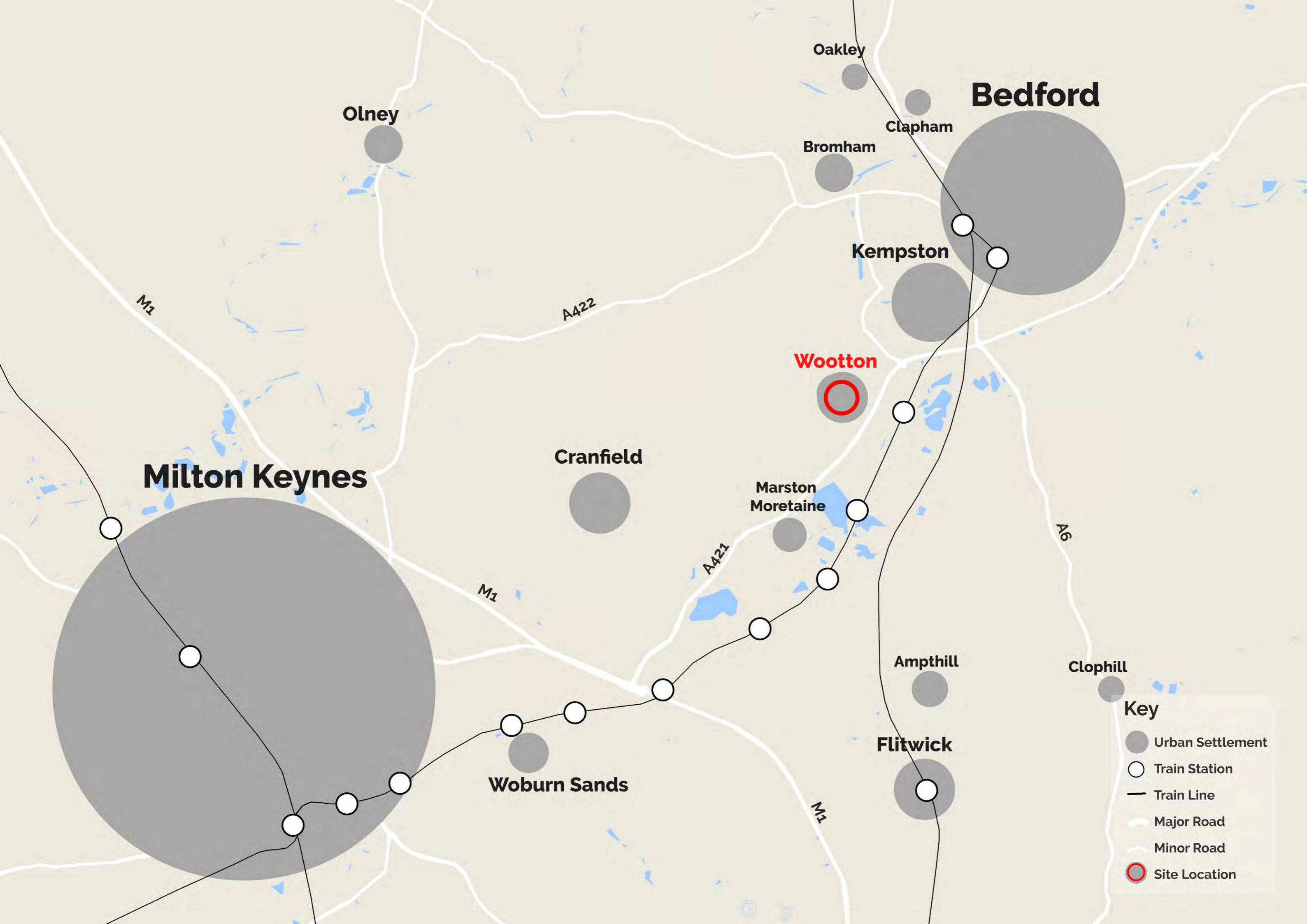
*A development's context refers to the particular characteristics of the application site and its wider setting. These will be specific to the circumstances of an individual application and a Design and Access Statement should be tailored accordingly.*

*Design and Access Statements must also explain the applicant's approach to access and how relevant Local Plan policies have been taken into account. They must detail and consultation undertaken in relation to access issues, and how the outcome of this consultation has informed the proposed development. Applicants must also explain how any issues which might affect access to the proposed development have been addressed.*

## Background

The background to the identification of land to the west of Wootton as a location for a sustainable development is set out in the Planning Statement, accompanying this application. In short, Bedford Borough Council (BBC) is preparing a new Local Plan for the area and requires additional land to meet demand. The application site is controlled by Hollins Strategic Land (HSL).

Delivery of the scheme will implement key objectives of the NPPF, Bedford Green Infrastructure Plan and The Forest of Marston Vale Plan.



**Milton Keynes**

**Bedford**

**Wootton**

**Cranfield**

**Marston Moretaine**

**Woburn Sands**

**Flitwick**

**Ampthill**

**Clophill**

**Olney**

**Bromham**

**Clapham**

**Kempston**

M1

A422

M1

A421

A6

M1

**Key**

- Urban Settlement
- Train Station
- Train Line
- Major Road
- Minor Road
- Site Location

## Structure

The structure and content of this Statement has been prepared in accordance with the Regulatory requirements as set out in the Town and Country Planning (Development Management Procedure) (England) (Amendment) Order 2013 (Statutory Instrument 2013 No. 1238). It includes the following Sections:

- **Section 1** - sets out structure and purpose of the Statement and the background and context to the scheme.
- **Section 2** - describes the site and context and identifies important issues.
- **Section 3** - describes the landscape and townscape characteristics that will inform the character of the development.
- **Section 4** - appraises the site constraints and opportunities.
- **Section 5** - sets out the design objectives and development principles.
- **Section 6** - describes the design concept and evolution of the masterplan.
- **Section 7** - describes character areas.
- **Section 8** - describes the proposals and parameters with reference to the Illustrative Masterplan.
- **Section 9** - describes access through the development.
- **Section 10** - concludes the DAS.

## Project Team

### Emery Planning:

Planning

### The Urbanists

Masterplanning & Design

### ERAP

Ecology and Green Infrastructure

### CgMs:

Heritage and Archaeology

### Paul Basham Associates

Sustainable Transport

### Arbtech

Arboriculture

### UCML

Utilities

### Betts Associates

Flood Risk & Drainage

### Brownfield Solutions

Ground

### SUMO

Geophysical & Archaeology

### Influence

Landscape and Visual, Green Infrastructure

### Soils Ltd

Agriculture

### JLP Surveys

Topographical

## Policy Framework

The National Planning Policy Framework (NPPF) identifies good design as a key aspect of sustainable development, and one, which should be indivisible from good planning.

The NPPF states:

“The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.” (Para. 124).

Similarly, Paragraph 127 of the NPPF states that planning policies and decisions should aim to ensure that developments:

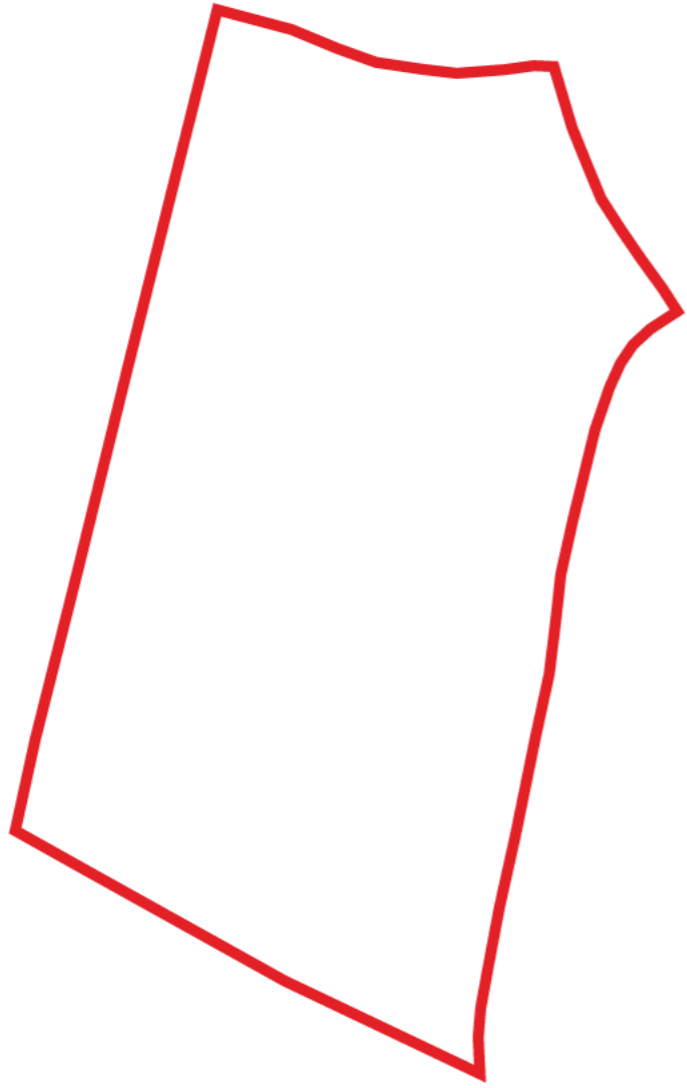
- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

In developing the masterplan, national and local policy and other design guidance has been carefully considered.









## Introduction

The NPPF notes that responding to local character and adding to the quality of an area should be an aim of development. Accordingly, an understanding of the context of a site is vital to producing a scheme that integrates with its surroundings. This section describes the site and surroundings and has been informed by the fieldwork and review of the planning application supporting documents. The various factors described below have informed the preparation of the masterplan and the influences are referred to in subsequent sections of this DAS, including the design response to townscape character.

## Location

The site is generally rectangular shape, on the edge of the western built-up area of Wootton, which lies south west of Bedford.

## Area

The site, as identified by the red line boundary, covers approximately 6.5 hectares (ha) or 16 acres.

## Boundaries

These can be identified on the site plan opposite. The northern edge of the site is defined by Hall End Road (also National Cycle Route 51) and the John Bunyan

Trail. There is a field access gate to the northeast corner of the site. From this direction, the settlement of Wootton has recently been expanded towards the site with the construction of 58 dwellings (Ref: 14/02939/MAF) and is a prominent feature. An allocation for a school extension is also located north of the site.

The eastern boundary runs alongside an unnamed road that provides access to Wootton Upper School and commercial/farm premises. The southern boundary is contiguous with Wootton Wood, an area of ancient and semi-natural woodland. The western boundary is shared with an adjacent field, laid to pasture.

These boundaries are all formed from native hedgerow with a combination of post and rail or post and wire fencing within.

## Access and Accessibility

The site is accessed via Hall End Road which is approximately 5.7 metres in width with a 1.8 metres footway flanking the north side of the carriageway leading into Wootton village centre via Church Road followed by Bedford Road. The A421 lies to the east of Wootton and runs north-south between Bedford and Milton Keynes.

Cycle links in the vicinity of the site are good. Route 51 which goes from Oxford to Colchester via Milton Keynes and Bedford, pass the site on Hall End Road. The layout of the local roads within the large village encourages low speeds (30 mph speed limits throughout) thereby providing an attractive and safer cycling environment.

The closest bus stops are to the east of the site on Cause End Road approximately 550 metres (7 minutes walk) from the site. The northbound bus stop serving Bedford is equipped with a sheltered seating area whilst the southbound bus stop serving Milton Keynes is equipped with a single post and timetable along with a public bench nearby.

The site is crossed along its northern boundary by a public right of way and abuts another along the western boundary.

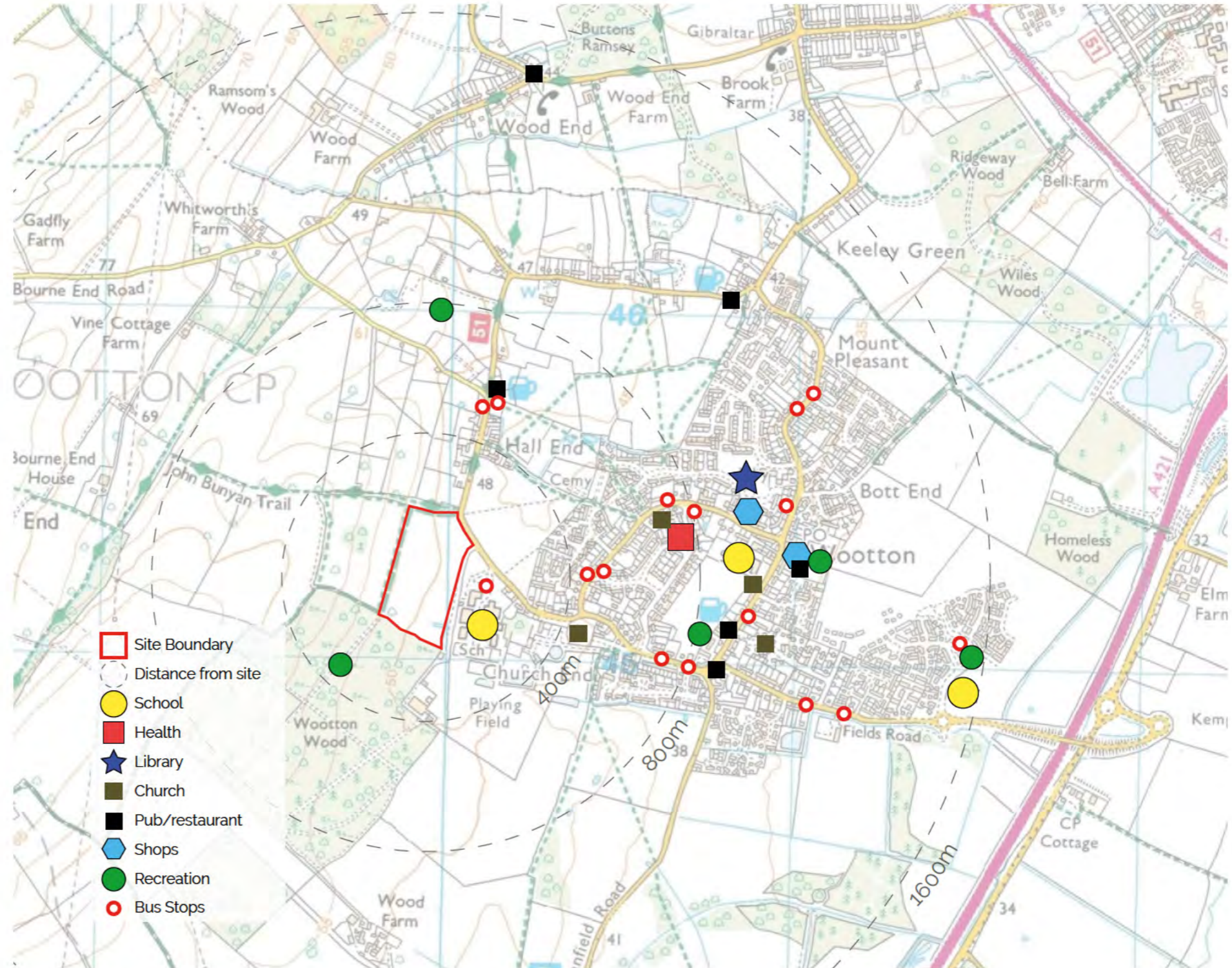
The nearest railway station is at Kempston Hardwick station approximately 3.7km from the site and can be accessed from Manor Road which is connected to Woburn Road. It is accessible by a 13 minute cycle ride. The station provides a direct service to

Bedford, a 12 minute journey, and a direct service to Bletchley, a 33 minute journey.



## Local Services and Facilities

The figures on this page illustrate the location of a range of facilities, services close to the site.

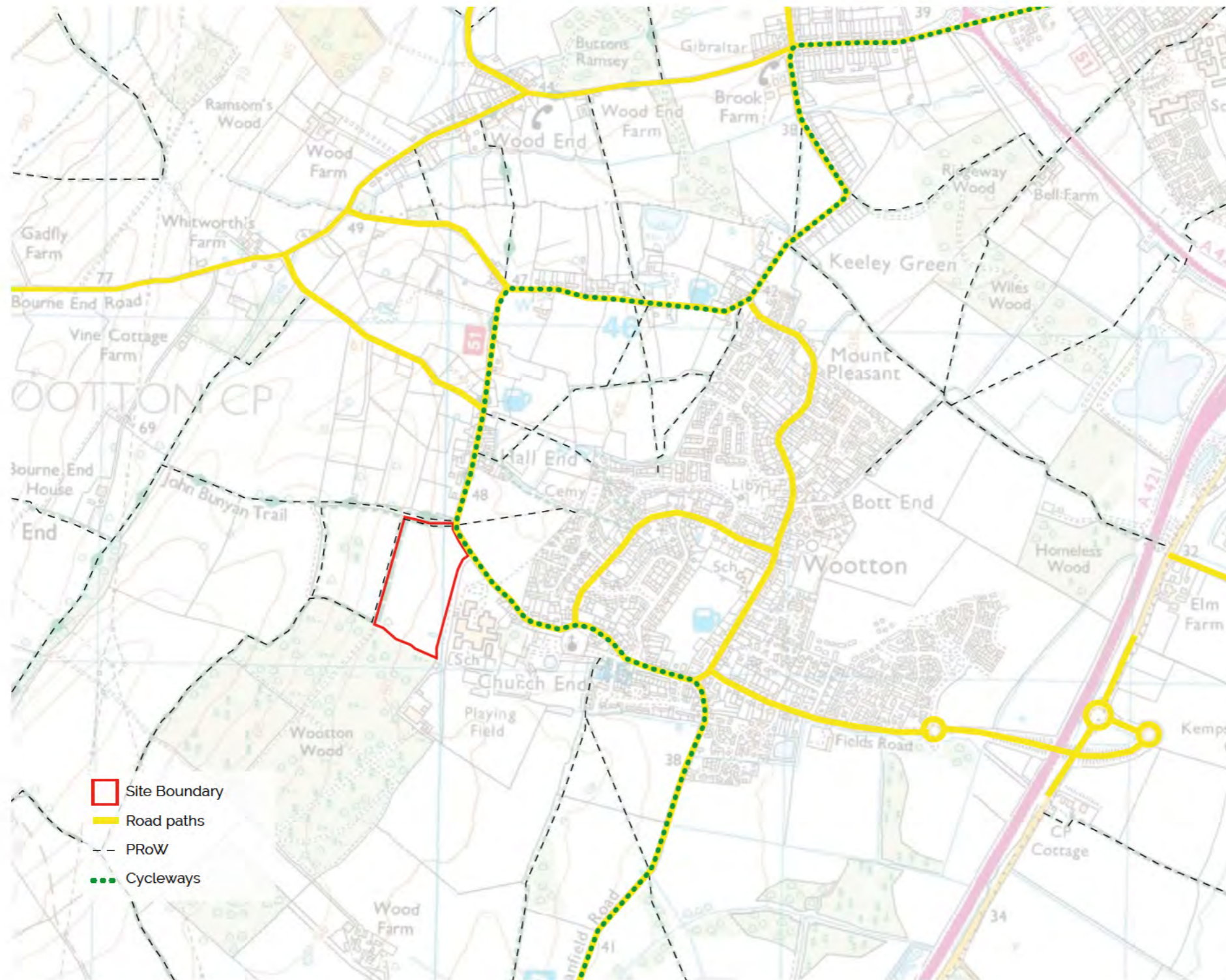


Existing Services and Facilities



## Footpaths, Cycleways and Public Rights of Way

The figure on this page illustrates the location of a range of footpaths along roads, cycleways and the interconnecting public rights of way network.



Footpath, cycleway and PRoW network





Site Topography & Vegetation



## Landscape

A Landscape and Visual Appraisal (LVA) based on the Guidelines for Landscape and Visual Impact Assessment (3rd Edition) was undertaken at the site. The landscape character within the Bedford Borough area is described within the Bedford Borough Landscape Character Assessment (May 2014). The southern section of the proposed site lies predominantly within the general Landscape Character Type 5: Clay Vales and specifically within the North Marston Clay Vale Landscape Character Area (LCA Type 5D). The northern section of the site however lies just within the general Landscape Character Type 1: Clay Farmland and specifically the Cranfield to Stagsden Clay Farmland Landscape Character Area (Type 1A).

Key positive features and strategic sensitivities of the Clay Farmland landscape within the LCA are described as:

- Landscape pattern provided by the remaining hedgerows and mature hedgerow trees, despite their poor condition. This pattern is vulnerable to erosion from further loss...and lack of management;
- Scattered spinneys and blocks of ancient woodland... which are vulnerable to lack of management and associated neglect;
- Areas of surviving small irregular fields are vulnerable to further loss due to agricultural reorganisation;

- High level of recreational access via rights of way network... which forms a connection with the Greensand Ridge Walk;
- Small scale rural lanes plus large areas only accessible via rights of way – limited access;
- Strong rural character over much of the area, which is vulnerable to urban influence.;

Key positive features and strategic sensitivities of the North Marston Clay Vale landscape within the LCA are described as:

- Public rights of way providing connections to recreational routes in adjacent areas and links to the urban area – need to conserve and enhance this green infrastructure;
- Surviving areas of mature woodland including ancient woodland, e.g. Wootton Wood, which are potentially vulnerable to fragmentation;
- Areas of farmland with intact character... which retain strong field patterns and numerous hedgerow trees;
- Small irregular fields of medieval origin around the perimeter of the area, some associated with ancient woodland;

## Views

The site is located in an area that has distinctive topography, which creates closed views from the western edge of the site.

Following the field survey the actual, as opposed to the theoretical visibility of the site is substantially less than the theoretical visibility. The study has shown that the visual envelope of the site is limited by the following factors:

- As demonstrated on the ZTV, raising ground topography to the west of the site closes down views to within just 250m to the west of the site.
- The dense tree mass of Wootton Wood prevents any further views of the site from the south and south west.
- The built mass of Wootton Upper School and tree planting to the north of the grounds limits views of the site from all but the closest residential properties in Wootton to the east, including any potential views from the village Conservation Area.
- The built form of Wootton itself further precludes views from the east;
- Vegetation strips to the south of Wootton village limit views from the southeast.

The above factors combine to substantially restrict the visual envelope and effectively screen the site; with all key views being from well within 1km of the site boundary.

Nine visual receptors (publicly accessible viewpoints) were selected in the LVA to provide a representative sample of typical views towards the site. A greater number of locations were visited than have been included in the report. Those locations from which no clear views were obtainable, have generally been excluded from the LVA, in line with GLVIA3 guidance. A smaller selection of views are shown in the following pages.

Residential receptors, which form the closest and potentially most sensitive group, include residents and visitors to the adjacent new build development properties on the edge of Wootton village. The closest properties here are adjacent to the northeast corner of the site on the opposite side of Hall End Road.



1

2

3

4

[View Location Plan](#)  
.....



**View 1**

The John Bunyan Way long distance trail runs along the northern edge of the site, from the Hall End Road. There are direct views into the site through intermittent gappy hedgerow here. These views set the site in context with the edge of Wootton village, residential development and the adjacent School.



View 1: View southeast towards the site from PRoW footpath Wootton 11/ John Bunyan Trail



View 2: View northeast towards the site from PRoW bridleway Wootton 4



The trail continues along the boundary of the adjacent field to the west of the site and from here intermittent gaps within the boundary hedgerow afford views back toward the site. These views also set the site in context with the edge of Wootton village, residential development and the adjacent School.



The visibility of the site from here becomes oblique and is further screened by tree planting to the front of Wootton Upper School. The built form of Wootton Upper School and its surroundings is noticeable to the west.

Wootton Hall, approx. 250m to the east of the site and within the conservation area is private property but it is likely that heavy tree planting and the intervening structure of Wootton Upper School would heavily obscure views from here.



View 3: View west towards the site Hall End Road



View 4: View southwest towards the site from corner of PRow footpath Wootton 35



The closest properties are adjacent to the northeast corner of the site on the opposite side of Hall End Road. This view is limited by Wootton Wood and the rising topography in the east.

New build housing development here is prominent to the west of the view towards the site. They have a view of the site over roadside hedgerow. There is a high voltage power line on the horizon line and a low voltage line in the foreground.

Views here would be reduced significantly further once the allocation for the school extension is built out.

## Green Infrastructure

This site is within the Green Infrastructure Network Area of 'Bedford to Milton Keynes - Marston Vale'. The area is dominated by the industrial heritage associated with the former brickworks and current brickpit landfill activities. Green infrastructure assets include the emerging Forest of Marston Vale with its Millennium Country Park, the „Green Gateway network of woodlands between Wootton and Kempston, National Cycle Route 51, the Bunyan Trail, Clay Way, the Elstow Brook, and a number of wetland sites associated with flooded brickpits. On the edges of the clay vale, there are a number of ancient woodlands, including Wootton Wood, Kempston Wood, Ramsons Wood, Astey Wood, Hanger Wood and Oxleys.

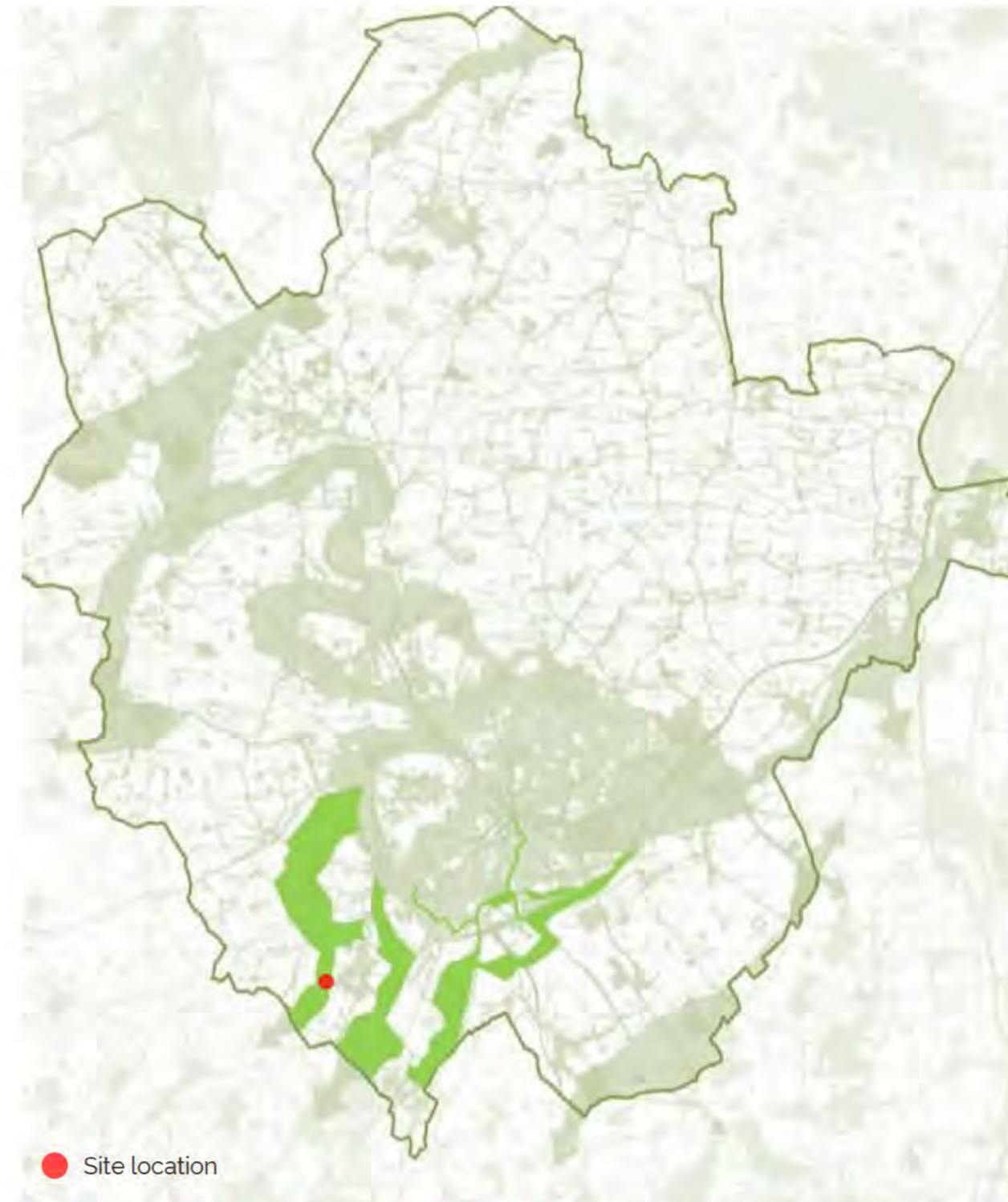
There are a range of green infrastructure opportunities across the area, which will bring about significant change to its character, including:

- The Forest of Marston Vale is a key green infrastructure project for the area. It is a community forest project with the aim of increasing woodland cover of the Vale to 30%. At a local scale, this will involve linking and extending existing woodland sites.
- Improving access routes, including the south west section of the Bedford Green Wheel, Clay Way and Bunyan Trail.
- Extending the 'Green Gateway' concept will increase woodland cover and

provide green space for new and existing communities and buffer new development.

- Mitigating the negative impacts of the highway network to improve tranquillity, reduce visual impact, create green corridors for biodiversity and enhance local distinctiveness.
- Creating new ponds and associated habitats.
- Reinstating hedgerows and hedgerow trees.

The green infrastructure plan provides an evidence base to identify where the priority areas for protecting, enhancing and creating green infrastructure are. The plan will therefore provide information to assess development proposals and the negotiation of planning obligations.



Green Infrastructure Network: Bedford to Milton Keynes - Marston Vale

## Ecology

The site has no statutory designation for nature conservation and there are no statutory designated sites within a two kilometre radius of the site. The site lies outside of the Greensand Ridge Nature Improvement Area (NIA).

The site occupies approximately 13% of the larger area designated as Wootton Wood County Wildlife Site (CWS). Designated as Neutral Grassland on the Biodiversity Opportunity Network 2008.

Recognised for ancient semi-natural broadleaved woodland and neutral grassland. Priority Habitat present: broadleaved, mixed and yew woodland (broad habitat), neutral grassland (broad habitat) and ponds.

The site comprises neutral grassland on boulder clay or decalcified boulder clay with a pond and hedge.

The single field of neutral grassland is grazed by a low density of horses with a taped off area of more intensive grazing at the north-eastern corner of the site. Liaison with the landowner has confirmed that the grassland is managed via grazing ponies all year round. The grassland is not cut for hay but the grassland is topped on an annual basis and neither fertiliser or herbicide are used at the site.

The neutral grassland is characterised by constant, frequent and locally abundant Crested Dog's-tail (*Cynosurus cristatus*), Yorkshire-fog (*Holcus lanatus*) and White

Clover (*Trifolium repens*), constant and abundant Creeping Cinquefoil (*Potentilla reptans*). Agrimony (*Agrimonia eupatoria*), Perennial Rye-grass (*Lolium perenne*), Smooth Meadow-grass (*Poa pratensis*) and Bulbous Buttercup (*Ranunculus bulbosus*) are constant and frequent throughout the grassland. Frequent Sweet Vernal-grass (*Anthoxanthum odoratum*) and Soft-brome (*Bromus hordeaceus*) are also present.

The more intensive grazing at the north-eastern corner has resulted in a local increase in cover of plant species more tolerant of trampling and grazing such as Annual Meadow-grass, White Clover and Ribwort Plantain.

Wootton Wood lies to the south of the site and comprises a large expanse of mixed woodland characterised by Oak, Ash and Field Maple at the northern end.



## Historical Evolution

The historical maps opposite show the development of Wootton over the past 130 years.

The Domesday Book of 1086, listed Wootton as having 26 residents (20 villagers and six slaves) across ten hides. The 1882 map opposite shows development focused around Church Road and The Church of St Mary the Virgin which is mainly 14th century. There is also some dispersed development along Causeway Road and at Hall End. Much of the character of Wootton at this time was ribbon development.

Over the next six decades little development has taken place other than ribbon development along Fields Road and jutting towards Keely Green (northern end of Bedford Road). This has effectively merged Keely Green with Wootton. The central core at Church Road is retained.

Over the next 40 years, Wootton grows significantly, with most estate development taking place north of Church Road and west of Bedford Road to form a more consolidated settlement. A large school is also introduced south of Hall End Road which extends the settlement out further west. Development has also consolidated and extended further north.

Wootton has continued to grow mostly eastwards towards the A421. Development has extended southwards along Cranfield Road and westwards towards Hall End with the addition of more than 1,000 dwellings, a school and some community services and facilities.

The site itself has retained the same field boundaries since 1882. Wootton has seen very little development to the west, but the site provides a logical extension to the village in this direction.

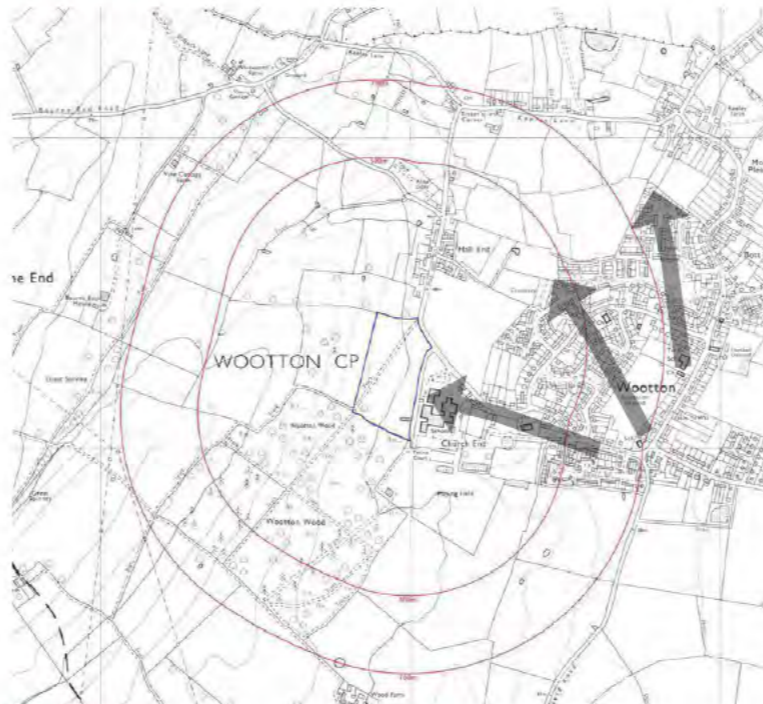
The population is now around 4,156 (Census 2011)



1882: Tithe Map  
●●●●●●●●●●



1938: OS Map  
●●●●●●●●●●



1980: OS Map  
●●●●●●●●●●



2017: Satellite Map  
●●●●●●●●●●

## Historic Built Environment

Data obtained from Historic England and Bedford Borough Council confirms that there are no Scheduled Monuments, Registered Battlefields, Registered Parks and Gardens, Conservation Areas or Listed Buildings which cover the site.

Twenty one Listed Buildings are recorded within the study area. Nineteen are Grade II, whilst Wootton House is Grade II\* and The Church of St Mary Grade I. Wootton House and The Church of St Mary lie within the Wootton Conservation Area, along with nine Grade II Listed Buildings. The western boundary of Wootton Conservation Area is located approximately 200m to the south of the study site. It is currently screened from the study site by hedgerows and mature trees forming the eastern boundary of the site, recent development immediately to the north east and the buildings of Wootton Upper School. Provided any vegetation is retained, the Conservation Area will not be sensitive to development on the site.

There is no inter-visibility between the study site and any of the other ten Grade II Listed Buildings within the study area that lie outside of the Conservation Area due to the presence of buildings, hedges and the landscape form. Furthermore, the site does not contribute to their setting and as such, there is not considered to be any potential for adverse impacts to the setting of these designated assets.

## Archaeology

Two non-designated heritage assets are recorded, but unconfirmed, within the site; the site of a possible former kiln identified through field name evidence (MBD8289) and levelled ridge and furrow earthworks identified through RAF aerial photographs.

A further 42 non-designated assets have been identified within the study area. Of these, 23 represent extant Post-Medieval and Modern buildings with the remainder represent archaeological features, sites of former buildings or areas of settlement and locations where artefacts have been recovered.

A geophysical survey of the study site has been undertaken to inform the application. This identified the remains of furrows, their apparent S-shape characteristic of Medieval ploughing, across the site, the western part of which correlates with the area identified as containing levelled ridge and furrow earthworks. No evidence for the presence of a kiln was identified, although anomalies within the southern portion of the site may represent a spread of brick or tile. Any archaeological remains associated with the former ridge and furrow that does survive below ground will have very limited evidential value due to their truncated nature. Any remains of a Post-Medieval or Modern Kiln that survive within the site could have evidential value and potential to contribute to local research agendas with regard to the understanding of the development of brick making within Bedfordshire during the

Post-Medieval and Modern periods.

Based on the available evidence and the results of the geophysical survey there is considered to be low potential for evidence of all periods and any are unlikely to be of such importance to preclude development.

	Uncertain Origin (discrete anomaly / trend)
	Agriculture (ridge and furrow)
	Agriculture (possible ridge and furrow)
	Former fenceline (conjectural)
	Equine exercise circle
	Natural (e.g. geological / pedological)
	Magnetic disturbance
	Service
	Ferrous



Magnetometer Survey - Interpretation







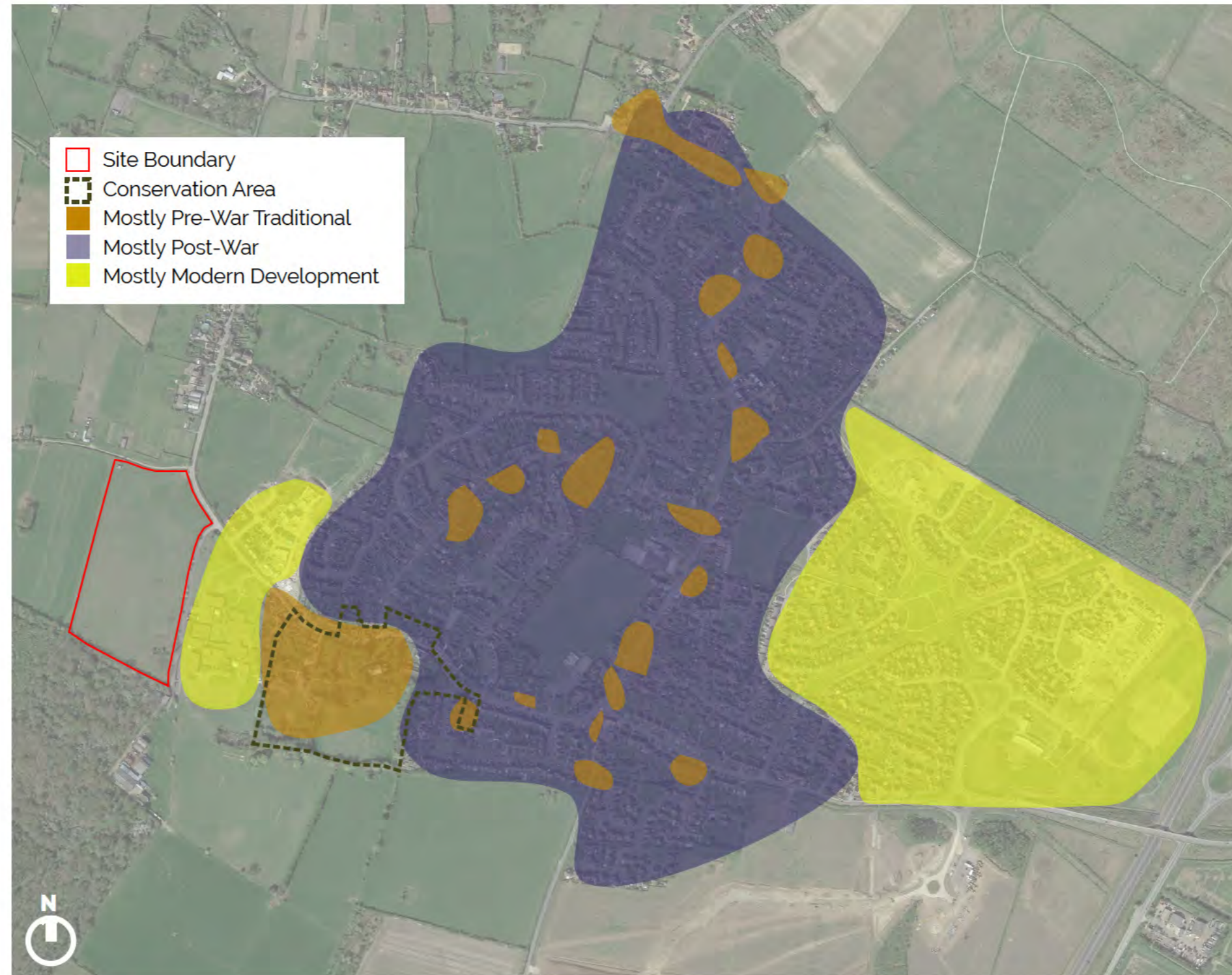
# 3.0 Townscape Character

## Introduction

Wootton contains a wide range of development patterns and architectural styles, though more recently modern development has become more evident. Its eclectic nature is typical of other nearby settlements such as Cranfield and Marston Moretaine and much of the village is comprised of "post war" residential development.

A townscape assessment has considered the character of residential development in the immediate vicinity of the site and around Wootton more generally. The assessment has concluded that there are three main types of development present:

- Post War - a diverse range of development built in 'estates', small parcels and groups of dwellings throughout the village;
- Pre- War Traditional - individual dwellings and small groups of related dwellings;
- Modern Development - seen mainly to the east of the village on Fields Road and small pockets elsewhere.



Wootton Character Areas  
.....

## Character Areas

### Post War

A wide range of development patterns and architectural styles are present in this area which encompasses the majority of Wootton. It includes early post war 'homes for heroes' type development around the 1950's (generally traditional in style although quite basic) through to more speculative development of the 60's and 70's (modern, with a clean, uncluttered aesthetic) and later speculative development of the 80's and 90's which returns to a more traditional aesthetic with more decorative features such as faux timber framing - 'mock Tudor'.

Generally, development in this area bears little relationship to the earlier, 'traditional' houses that were built from the 1600's up until the late Victorian and Edwardian periods. Although diverse, there is a sense that properties in this area are well maintained and popular. Development incorporates lots of 'greenery' in front gardens and pedestrian/vehicular circulation and parking is straightforward and unconstrained.

### Pre War

Dwellings in this area are original to Wootton and the surrounding area. There is a wide mix of houses, but there are commonalities such as wide fronted dwellings, pitched dormers and porches/door canopies, structural timber framing with brick/render panels, black timber cladding and occasional gables orientated to the street. Building materials are typically orange brick or white render with plain clay tiles.

The most well preserved areas of this type of development can be found on Church Road and Cause End Road - although there are pockets throughout Wootton. This is recognised by the Wootton conservation area designation and concentration of listed buildings around Church Road.

### Modern Development

This area is found to the east of Wootton off Fields Road as well as the western end of Hall End Road. Areas with distinctive characteristics are present, such as 'traditional' and semi formal in appearance and 'contemporary' with a mix of informal and semi formal qualities. These areas use complementary building materials (with the exception of 'timber' cladding which is only seen in the contemporary area).

There are principle differences within the area associated with fenestration (e.g. the use of stone headers and sills as opposed to none or very simple sills projecting from window frames only) in the contemporary areas. Window frames are white in the traditional area and grey in the contemporary areas. Additional architectural features such as pitched door canopies, porches and gables are present in the traditional area, and whilst there are similar types of features in the contemporary area they are more subtle and less decorative - harking back to earlier development in Wootton seen in the 'Post War' area, which has clearly been an influence here .



Orange brick, off white render, 'timber frame', pantiles



Yellow brick, tile hanging/pvcu fascia board, pantiles



Off white cement render, timber frame and plain clay tiles



Structural timber frame with brick panels and clay tiles



Cement render, brick/stone details, pitched dormers



Yellow brick, white render with brick bay, grey fenestration

## Pre-War

### Typical Features

- Simple rectangular plan with pitched roof (sometimes with dormer windows) orientated parallel to the street;
- Occasional 'L' shaped dwelling or dwelling rotated through 90 degrees to the street - narrow edge to street;
- Gables facing the street;
- White painted brick or white painted cement render - in smooth and rough cast textures;
- Hand struck 'Orange' bricks;
- Black stained timber cladding;
- Black timber framing with rendered/ painted (white or off white) infill panels;
- White fenestration with black rainwater goods;
- Simple details e.g. small scale or hidden headers and sills and no stone work; and
- Roof coverings typically plain clay tiles in orange and red shades - occasionally pantiles.

## Post-War

### Typical Features

- Variety of rectangular, square and 'L' shaped dwellings with pitched roofs orientated parallel or perpendicular to the street;
- Wire cut brick in various brown, orange and yellow shades;
- Typically white (occasionally brown or black) pvcu windows, rainwater goods, fascia boards and boxing to eaves;
- Cement render in various off-white shades;
- Occasional use of faux timber framing;
- Pvcu fascia board used as a cladding material;
- Concrete tiles hung on front elevations;
- Simple/ minimal headers and sills;
- Concrete roof tiles - plain or profiled; and
- A 'clean' aesthetic that is not overly decorative.

## Modern

### Typical Traditional Features

- Simple rectangular plans with pitched roofs orientated to the street with a mix of short groups, detached and semi-detached arrangements;
- Orange/ brown bricks - wire cut and 'stock';
- Smooth textured off-white cement render;
- Plain tiles in orange and grey shades;
- Brick headers and stone sills / stone headers and sills;
- White fenestration with black rainwater goods;
- Gables facing the street; and
- Pitched dormers and door canopies, occasional flat top door canopies;

### Typical Contemporary Features

- Mix of dwelling types in rectangular and square formats with pitched roofs orientated to the street and occasional projecting bays;
- Smooth textured off-white cement render;
- Orange/ yellow bricks - wire cut and 'stock';
- Plain tiles in orange and grey shades;
- 'Timber' cladding in a variety of shades e.g. black, natural and blueish grey;
- Feature gables facing the street; and
- Grey fenestration with black rainwater goods.





# Constraints & Opportunities

## Introduction

The evaluation of the site and its context has identified key on and off-site features which have helped to inform the continuing evolution of the development proposals. In summary the site has no physical constraints to residential development, but some do exert an influence.

The plan opposite sets out the primary constraints and opportunities which have been considered during the design process.

1. **Site boundaries: hedgerows and existing trees mainly located along the edges of the site. Built development will need to avoid the root protection areas. There is an opportunity to create a development which retains and enhances the existing vegetation as an asset.**
2. **There are some views towards the site from the open fields to the west and north which currently look onto the edge of Wootton and Wootton Wood. There is an opportunity here to introduce new planting and enhance existing planting to replicate the surrounding character.**
3. **Properties back onto the existing settlement and create an unattractive edge. This interface with the countryside can be improved through providing units that front onto the open space around the site, particularly the west and south.**
4. **More distant views from local Public Rights of Way in particular to the western aspect towards the built edge of Wootton can be filtered and softened with improved landscaping.**
5. **Retain all public access available to existing PRoW and bridleways and connect to these existing routes where logical.**
6. **There is an opportunity to mirror the arrangement of development to the north by providing an appropriate and sensitive layout and low-density dwellings along the western and southern edge of the development with large gardens. This allows**  
for transition from residential development into countryside.
7. **Topography: there is an opportunity to utilise the natural rise in landform to reduce densities of development west and south. This also ensures dwellings are located in the most lower lying areas.**
8. **Appropriate buffers away from existing pond and woodland to safeguard existing habitats and protected species.**
9. **Provide an extension of woodland in the south to tie into local Green Infrastructure Network objectives and improve habitat connectivity around and through the site.**
10. **Enhance existing ecological habitats including green crested newts. Area could also accommodate an enhancement for local education given the locality of the schools.**
11. **Combine visual softening of existing and proposed new urban edge with provision of large open space and protected grassland.**
12. **Enhance John Bunyan trail route and Public Rights of Way with new green infrastructure.**
13. **Development will allow easement for underground utility. In this instance, an underground water service is a constraint which will require access within development.**



School Extension Allocation Site

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# 5.0 Design Objectives

## Development Principles

This section identifies core design principles that have been considered to help to create a sustainable environment which exhibits a high level of design quality. The objectives have been extracted from best practice urban design guidance including the Design Compendium, Responsive Environments, Manual for Streets and Building for Life.



### Compactness

To provide a truly sustainable scheme it is essential to efficiently consider land use appropriately and ensure maximum connectivity and permeability. To achieve this the development will:

- Provide an appropriate density of development for a site that is an integral part of the village
- Create places for people, whilst recognising the need for the car, through prioritisation of routes for pedestrians and cyclists, and careful consideration of surface treatments
- Provide practical and usable amenity space, which reflect desire lines and meets public need

### Accessibility

An accessible scheme will accommodate all users and ensure safe and secure access to local facilities. The site should be incorporated into the local movement network by:

- Facilitating movement within the site and surrounding areas
- Connecting to the existing footways and footpaths
- Ensuring pedestrian movement is safe and easy with cars prevented from dominating
- Establishing a layout that is legible and can easily be read by all users
- Designing access for all including the needs of those with visual and hearing impairments and those with limited mobility

### Legibility

A legible scheme will allow people to easily read their surroundings and orientate themselves.

Legibility should be created or enhanced by:

- Clearly marking entrance points and routes through the scheme
- Creating identity and character using the site's existing and natural characteristics and new design elements
- Using a clear street hierarchy
- Defining spaces which are memorable
- Landscaping and varying materials to indicate clear routes
- Creating a central focus for development
- Utilising existing landscape features as distinctive elements



### Context & Character

Integrating the site into the surrounding area and establishing character is vital in delivering a successful scheme. This includes locally distinctive development patterns, landscape, culture, materials and biodiversity. To enable this:

- The development will adopt a style and character which draws on and interprets the key elements of the surrounding settlement as identified in the character and context appraisal.
- The development will adopt a style that is complementary to the Conservation Area.
- The scale and massing of the development will respond to surrounding development
- The development will contribute a positive change to the image of the area with high quality new development

### Continuity & Enclosure

The enclosure of streets and spaces, a consistent building line and active frontages onto the public realm are essential components in the creation of a safe and secure environment.

This helps to create a stronger sense of place and identity and encourages social interaction. The development must have:

- Units that face on to streets and spaces creating high levels of activity and surveillance
- Spaces that are well enclosed by development to create a sense of place and to promote public safety and security
- A relationship between building height and road/space width to create the appropriate sense of enclosure in relation to spatial role and form
- Clarity in what is public and what is private space

### Adaptability & Diversity

The scheme must be designed to be robust, to accommodate the needs and expectations of inhabitants and users as they change. This can be achieved through:

- Creating flexible development plots, to allow units to be converted or extended
- High quality homes that are built to last, and permit alteration to the structure over time
- Designing spaces that are capable of adapting over time and which can fulfil a number of roles
- Streets that are simple, robust and clutter free
- Variety and diversity should be increased via the following:
- Providing a mix of property types and tenures that build on the existing stock
- Variety in building form, plot structure, detailing and materials to create uniqueness
- Creating distinctive spaces that add character to the development

### Sustainability & Efficiency

The development should be designed and delivered to minimise resource use and maximise energy efficiency during construction and operation. This should include:

- Orientation to take advantage of passive solar gain should be considered
- Conservation of energy consumption both during construction and by the site's end users
- Conservation of water through reduced consumption
- Minimising surface water runoff





# 6.0

## Concept & Developing the Masterplan

The development concept for the site is a simple but robust one. It is based around the issues and opportunities that have emerged from a thorough site analysis.

Key to the success of the development as a "place" will be its integration with the surrounding landscape and ecology. Development frontage to Hall End Road and open countryside will also be an important factor in maintaining a sensitive relationship with the surrounding context whilst respecting the proximity to the existing public rights of way.

The key components of the concept are outlined on the plan adjacent and below:

- 1. Sufficient setbacks for units within the site need to be maintained from Hall End Road and open countryside to mitigate the impact on the setting of those footpaths.**
- 2. Create new green infrastructure and enhance existing vegetation along edges of the site and introduce new green landscaping along the streets through the development to enhance ecological connectivity and soften views towards and through the site.**
- 3. Provision of new ecological habitats, enhancement of existing and safeguarding their long term management.**
- 4. Provision of large protected open spaces along the western and southern edge of the site to protect ecological assets and provide a transition between the proposed development area and the wider landscape. This will also assist in helping the site integrate well with the adjacent green infrastructure.**
- 5. Utilising the surrounding urban fabric to inform the development and create an urban hierarchy to help assist in legibility and character.**
- 6. Outward facing development with soft green edges to create safe walking environments.**
- 7. Adopting architectural forms that are typical of the area to assist in the site contributing the overall character of the area.**
- 8. A safe and accessible access onto Hall End Road.**
- 9. Creating a development which provides new safe and attractive foot and cycle ways and connects to the existing network.**



School Extension Allocation

Wootton Upper School

Wootton Wood

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# 7.0

## Masterplan

### Introduction

The layout has been led primarily by a response to ecology and landscape. An understanding of the site's unique ecological and landscape character informs the design decisions and ultimately forms the basis of a responsive development that compliments the local character of the area and responds sensitively to the existing ecology and landscape context.

The layout is shaped by new proposed attractive paths, trees and hedgerows, whilst the existing hedgerows have been given strong natural buffers with development overlooking them where possible to encourage a softer relationship through the site to the wider landscape. It is proposed that native hedgerow around and within the development area will contain new tree planting which will help contribute to the structural and habitat diversity connecting across the site.

The development will incorporate a variety in density and house types to create multiple character areas within the scheme and inform an urban hierarchy. The masterplan demonstrates how a high quality development meets the site and policy requirements and fits with the local context.

In summary the development provides the following:

- Residential development of up to 81 dwellings with a gross density of 12.4 dph across the site and a net density of 25 dph. The density across the site ranges from 20-30 dph in character with existing development in Wootton.
- New vehicular access off Hall End Road to adoptable standards.
- Development based around shared surface streets and spaces. This helps to create a strong sense of place whilst settling the proposed development into the village context.
- Private drives at the forefront of the development helps to create an outward-looking scheme, fronting onto open spaces and providing natural surveillance for safer pathways. This also helps to maintain an intimate character and scale to much of the development which is akin to some more historic areas in Wootton.
- Existing hedgerow site boundaries are to be retained and enhanced which will help contribute to the structural and habitat diversity and connections across the site.
- The layout has been designed to limit localised impacts on landscape, situated on the most lower-lying areas.
- A significant area of protected meadow to the west and south provides a key amenity area and an attractive outlook for many properties. It also acts as a natural terminating point for views into the site, reducing the amount of visible built environment.



Existing Development

Hall End Road

Wootton Upper School

Existing Pond

New Pond

Wootton Wood

New Pond

## Linkages

Vehicular access to the proposed development would be via a new access off Hall End Road.

The site includes sufficient land to implement an access with standard Manual for Street (MfS) geometry including a 5.5m wide carriageway, 2 metre wide footways on both sides and appropriate junction radii.

This will be able to accommodate all standard vehicle types safely and efficiently. The visibility from the site access onto Hall End Road will also comply with MfS with 2.4 metres by 50.3 metre splays northbound and 2.4 metres by 49.8 metre splays southbound being achievable within land controlled by the applicant or the adopted highway.

## Legibility

The layout illustrates the indicative location of landmark buildings, landscape features and key edges that will enhance the legibility of the layout.

Typically, key edges define the entrances into character areas; reinforce the legibility of key routes; signify an important civic or public building, such as the primary school and community building; and terminate views and vistas through the development area.

The masterplan does not exclude other locations for keynote/landmark buildings, key edges and features which can add

interest and diversity to the street scene/setting of the development.

The scale and distinctiveness of the buildings within the local centres will define the importance of these community spaces. There is also the potential for specimen landmark tree or public art as a focal point within the square.

## Edge Conditions

A coherent set of edge conditions will be one of the elements that will define the character of streets and spaces. These will include height, set back, boundary treatment and degree of continuous built frontage and with variation in materials and appearance help describe the different character areas and hierarchy of street and open spaces. To the countryside edges these conditions will seek to ensure that there is strong landscape character with buildings set within large plots and less continuous built edges to avoid the identified issues with Hamilton. By contrast, within the district and local centre squares a more urban character would be sought with buildings helping to frame the spaces.



Street Hierarchy Plan

## Density

A balanced approach to density is taken which is in character with existing parts of Wootton. The density plan shows density gradually changing in response to contour lines and the location within the development.

Densities also vary across the scheme to give a progressive change in character and typologies.

The development edge is shown up to 20 dph which allows for a greater variety of housing typologies including large detached houses with a looser arrangement within blocks broken up by landscaping and tree planting. Coupled with soft landscaping, this helps to provide breaks and gaps in the built form line.

This density is predominantly around the outer edge of the development where development draws from certain character areas around Wootton, such as parts of Hall End Road and Church Road. Around 30 dph is allowed for within the central areas of the development. This produces a tighter grain of built form with townhouses, terraces and apartments.

## Height

The scale, height and massing of individual buildings will be determined at detailed design stage in accordance with local policy and character.



Density Plan  
●●●●●●●●

## Community Safety

Community safety and security are essential elements to the success of a sustainable development scheme at Hall End Road.

The focused attention to the design of the development parcels, and relationships with the existing landscape character, it is hoped will succeed in the attractiveness of the layout as a whole. By maximising on providing active frontages to these landscape features, and open spaces not only ensures natural surveillance but will promote a greater respect towards the environment and stimulate a desirable level of human activity and influence the behaviour of users.

### Access and Movement

The layout supports a good movement framework to enable direct routes leading people to their destination intuitively by whatever means of transport, including on foot, by cycle, or car. It also support a good movement framework towards accessing public transport and well as connecting to the wider right of way network.

### Ownership

It is considered the design and layout has a clear distinction between public, communal and private space.

### Activity

It is envisaged the design of the open spaces creates a high quality open environment thereby reducing the potential for crime or disorder.

## Ecology

Ecological guidance, based on the baseline surveys, has been provided to the design team throughout the preparation of the site masterplan. This approach has ensured that the masterplan has been ecology-led to achieve a sympathetic scheme which avoids the occurrence of likely significant effects where possible and seeks to minimise adverse effects where avoidance is not possible.

The guidance follows 'The Mitigation Hierarchy' (i.e. avoid, mitigate, compensate) as advised by paragraph 175 of the NPPF (Ministry of Housing, Communities and Local Government, February 2019).

Embedded mitigation for biodiversity that has been accommodated by the site masterplan comprises:

- Retention of the boundary hedgerows (with the exception of removal of a section of Hedgerow 4 to create a site access);
- Retention of the standing dead tree (Tree 1);
- Development concentrated at the north-eastern area of the field to include the areas of more intensively grazed grassland and areas of lower species diversity;
- Retention of a buffer and maximised distance between Wootton Wood and the developed area of the site;
- A 'soft' edge to the developed area with

a buffer of landscape planting; and

- Provisions for great crested newt to include two new ponds;

The proposals seek to develop 3.1 hectares (47.7%) of the 6.5 hectare site to housing, associated roads and hard standing and the remaining majority of 3.4 hectares (52.3%) of the site will be retained and enhanced for biodiversity.

Based on the current masterplan plan the development area occupies 3.06 hectares of neutral grassland and 0.04 hectares of hedgerow; this equates to 6% of the Wootton Wood CWS. The proposals will achieve the retention and positive management of 3.4 hectares of habitat comprising of neutral grassland, hedgerows and pond(s) equivalent to 7% of the total CWS area. This has the potential to make a significant contribution to the ecological value of the wider CWS and will secure the future of the grassland.

The development will not sever or block existing PROW and no additional public footpaths are proposed through the grassland.

Although the site lies outside the Biodiversity Opportunity Network 2008 area, the proposals provide an opportunity to contribute to the Network by supplementary native planting to improve the green link between land to the north, along the eastern boundary of the site, to the habitats associated with the River Flit to the south which does lie within the network.



Avenue of European Common Lime Trees



Local heritage apple tree varieties



Ornamental shrubs



Wet grassland - Emorsgate Seed Mix EP1



Species-rich grassland - Emorsgate Seed Mix EM2

## Green Infrastructure

The masterplan seeks to create a place that has good access to a variety of green spaces and facilities, known as "green infrastructure". A network of green corridors around and through the proposed development areas creates distinct routes to the main open spaces and the countryside beyond.

This site is within the Green Infrastructure Network Area of 'Bedford to Milton Keynes - Marston Vale'. The area is dominated by the industrial heritage associated with the former brickworks and current brickpit landfill activities. Green infrastructure assets include the Green Gateway network of woodlands between Wootton and Kempston, National Cycle Route 51, the Bunyan Trail, Clay Way, the Elstow Brook, and a number of wetland sites associated with flooded brickpits. On the edges of the clay vale, there are a number of ancient woodlands, including Wootton Wood, Kempston Wood, Ramsons Wood, Astey Wood, Hanger Wood and Oxleys.

There are a range of green infrastructure opportunities identified across the area and the proposals have sought to help deliver these, including:

- Increasing woodland links between Wootton Wood and the village;
- Improving access routes to the Bunyan Trail with increased planting and improvements to accessibility;
- Extending the 'Green Gateway' concept

will increase woodland cover and provide long-term managed green space for new and existing residents of Wootton;

- Increasing woodland cover whilst limiting the impacts of new planting on existing higher valued ecology;
- Providing a 'green entrance' and edge to the proposals, particularly along Hall End Road to help reduce visual impact and improve this approach into Wootton which currently has a hard development interface with the countryside;
- Creating new ponds and associated habitats, which is a key aim of wider green infrastructure objectives;
- Reinstating hedgerows and hedgerow trees.

Type of Green Infrastructure	Proposed Provision
New native tree woodland	## square metres
New hedgerow	## metres
New ponds	## square metres
Conserved grassland and managed long-term	3.4 hectares (52% of site)
New pedestrian and cycle links	## metres







# 8.0

## Character Areas

### Introduction

This section describes how the proposals were further developed through a series of character areas studies to assist in the definition of a sense of place. The design process had regard to the context appraisal and design objectives described earlier.

The character areas respond to existing site context, variations in layout density, formality and informality, as well linked to the street hierarchy. The character area parameter plan shows the boundaries of the proposed character areas. They are:

1. Main Street & Core
2. Green Entrance
3. Green Arcadian Edge



Character Areas  
.....

## Main Street & Core

The key characteristics of this area is an attractive pedestrian scale street continuously enclosed and fronted by houses. Parking and garaging is to the rear of properties which allows for narrower streets to give a height of buildings to street width ratio characteristic of the villages and towns in the area.

Key character elements:

1. Over-croft feature maintains strong frontage along the street and is characteristic of the area, usually clad in white timber.
2. Elevation achieves strong sense of symmetry which is prevalent within the surrounding context.
3. Timber cladding in gable ends is typical of the area.
4. Units incorporate a red brick plinths with coloured render for the rest of the elevation.
5. Car ports, Under-croft and rear courtyard parking mitigates on street parking reducing the risk of cars dominating the street.
6. Red brick walls for setting out boundaries along primary streets are prominent within Manningtree, Mistley and Lawford.
7. Units also turn corners maintaining strong frontage onto key/nodal areas.
8. Ornate doors are a common feature

within Manningtree and Mistly.

9. Elevation achieves strong sense of symmetry which is prevalent within the surrounding context.
10. Over-croft feature maintains strong frontage along the street and is characteristic of the area, usually clad in white timber.
11. Colour pallet draws on surrounding context utilising pastel reds, greens, browns and yellows.
12. Jettied first floors and gable ends create visual intrigue and is characteristic of larger focal units.
13. Large distances maintained between the existing mature hedge along Hall End Road and proposed building line to minimise impact on views towards site from public right of way.
14. Enhanced and retained vegetation assist in filtering development in views towards site.

The elevational treatment and street composition have been informed from the existing urban fabric on the opposite page.





1 Orange brick, off white render, 'timber frame', pantiles



2 Timber frame, dormers, cement render and plain clay tiles



3 Brown and orange brick, dressed stone detailing



4 Beckford Road, Wootton



5 Brown and orange brick, flat profiled tiles in red and grey



6 Cement render, brick / stone details, pitched dormers

## Green Arcadian Edge

The Layout for this character area achieves the lowest density for the site providing houses well-spaced to allow for existing and new landscaping to be dominating elements.

Key character elements:

1. Jettied gable feature provides visual intrigue and is in keeping with the architectural form found in the surrounding context.
2. Private garages are evident in the modern developments of Wootton and provide off street parking reducing the risk of cars dominating the street scene.
3. Timber framing mixed with red brick give additional character in-keeping with the more historic character in this part of Wootton.
4. Enhanced and retained vegetation assist in filtering development in views towards site.
5. White painted cement render evident in the inner village character.
6. Simple rectangular plan with pitched roof and the occasional dormer windows orientated parallel to the street.
7. Front and side facing plots on corners to allow safe and overlooked spaces.
8. Trellising on the side of units and garages allows for greening and softening of the landscape.
9. Given the more visually sensitive nature of this area of the site in comparison to other areas a looser urban fabric has been adopted allowing more space between units and avoiding creating strong building line, this also allows

for further planting to be introduced to assist the units in merging with the surrounding landscaping.

The elevational treatment and street composition have been informed from the existing urban fabric on the opposite page.



Green Arcadian Edge Elevation



1  
Timber frame give a more historic character and interest



2  
Yellow brick, white render with brick bay, grey fenestration.



3  
Dormer window details



4  
Trellising and hedgerows allow a green street scene









# 9.0 Access

## Vehicular Access

A new 5.5m wide access road is proposed with suitable geometries to accommodate refuse vehicles and allowing two vehicles to pass.

A visibility splay can be achieved of 2.4m x 50.3m northbound and 2.4m x 49.8m southbound.

The aim of the access strategy is to create both safe and convenient routes for new residents of the site and provide the opportunity for travel by non-car modes. Footpaths and cycleways have been an important part of the masterplan process.

## Pedestrians and Cyclists

A network of footpaths and cyclepaths will afford the most efficient and direct routes to John Bunyan Trail, wider PRow network, surrounding villages and to facilities in Wootton. Existing footpaths are retained and integrated within the layout.

Safe cycle and walking routes are key features of the masterplan that can reduce the need to travel by car. To support the integration of cycling into daily life, secure (communal or private) provision can also be made for cycle parking at key nodes near the access or adjacent to Wootton Upper School.

## The Street Hierarchy

The street hierarchy has been designed to:

1. Provide a legible and permeable framework for development;
2. Ensure that vehicles and pedestrian routes are both well overlooked and busy;
3. Design in and manage traffic speeds through traffic calming;
4. Accommodate a certain amount of on street parking, which brings activity to the street-scene and helps traffic calming.
5. As well as providing access, designed to reinforce legibility and the contrast between character areas.
6. Reflect the importance of routes according to the level of anticipated pedestrian, cycle and vehicular flow and the requirements of accessibility for servicing, refuse, emergency access and bus routing

The detailed design of the streets and spaces, with the exception of the southern link road, will be determined at the reserved matters stage.

Attention to materials, space and planting used in streets and at junctions will not only influence the final character of a place, but movement patterns and priorities by mode of travel.

The layout will incorporate design features that allow for safe access and movement

of service vehicles through the site, and also act to influence safe movement through the development, whether people are on foot, bicycle, car or bus. The general characteristics are set out in the following paragraphs.

### Main Street

The main street will be the most important and legible vehicular route.

Indicative road characteristics within the extent of built development:

1. 5.5 metre road width;
2. 2 metre footpath on both sides;
3. Landscaping (including street trees) and street furniture where appropriate;
4. Landscaped verges at particular nodes and where appropriate.

### Secondary Street

The secondary street is predominantly found where a continuous building line provides the street frontage in the urban areas. It will provide the main form of vehicular access into the residential areas from the main street. Within the urban areas, tight junction radii, streets designed for vehicle tracking rather than to set widths, minimal building line set back and pinch points will help to naturally calm traffic speeds.

This street form accommodates some informal tree planting and on-street parking. The carriageway widths, almost continuous built edges (walls and building) and greater degree of built enclosure, creates a noticeable change to a more

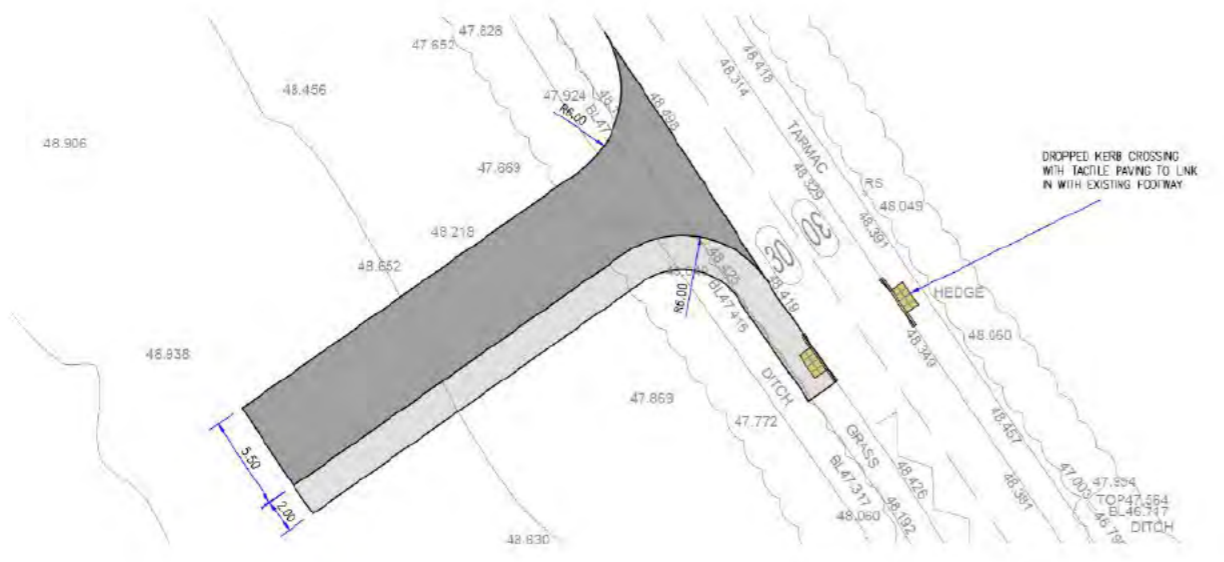
intimate character moving away from the main street. Indicative road characteristics are as follows:

1. 5.5m roadway (on street parking) and shared surfaces;
2. Mix of hard and soft verges;
3. Tree and shrub planting throughout;
4. Direct access to plots.

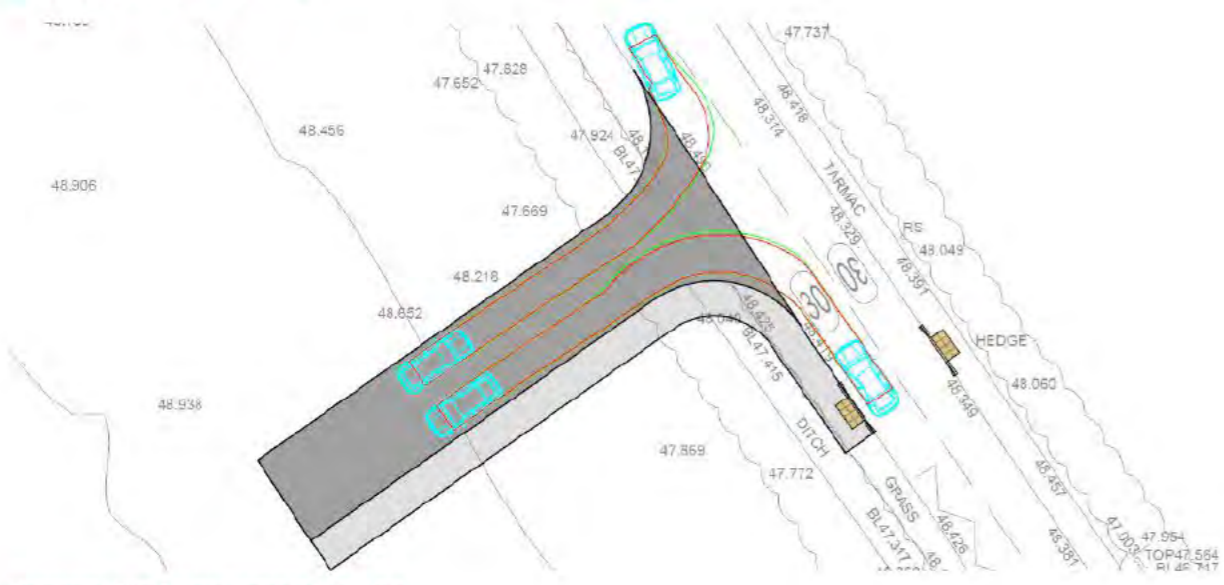
### Lanes

Lanes provide a looser highway structure and reinforce a rural 'edge' character. A footpath will be located on one side of the carriageway for 'busier' lanes. Lanes are prevalent along the edges of the built areas, allowing for active frontages to overlook open spaces. Indicative road characteristics:

1. 3.5 - 7.3m (shared surface) wide with optional footpath along one side of carriageway;
2. Connections to the wider footways and cycleways around the site;
3. Increased landscaping, soft verges and street furniture. Some tree planting in soft verges and areas generally associated with nodal spaces or grading into the perimeter structural landscape areas. Some tree and shrub planting to create smaller landscape nodal points at other locations and integration into the wider landscape.



Proposed Site Access Design



Proposed Site Access Vehicle Tracking



Accessibility Plan





**10.0**  
**Conclusion**

# 10.0

## Conclusion

### Delivering the Vision

The proposal will create a high-quality, sustainable ecology and landscape-led development which would provide a range of much needed housing within an area that has been identified in the emerging Local Plan as a suitable settlement for housing growth. It will deliver a wide range of tenures, types and sizes of homes in addition to affordable housing to meet local needs.

The proposal would integrate with the existing route network within the local area.

The layout shows how the principal elements of the proposals are incorporated in a way that helps retain and enhance the area alongside a series of key benefits.

Key benefits and principles of the proposals include:

- Development would help meet an identified housing need in Wootton and Bedford District and would include high-quality, energy efficient family homes in a sustainable location adjacent to existing housing, a school, and local facilities;
- Provision of much needed affordable housing including rented and discounted properties;
- A long-term management regime for existing ecological assets;
- A positive impact on the special interest of the nearby Conservation Area through a reinforcement of the local character and distinctiveness of the area and a more attractive wooded entrance from this side of the village;
- A landscape strategy of woodland and hedgerow planting, significant protected open spaces and buffers which results in improved green infrastructure in accordance with wider local objectives;
- The protection of existing ecological features and establishment of new native planting, new ponds, protection of local wildlife species and other ecology enhancements that would not otherwise have been secured;
- SuDs features and soft landscaping assisting in minimising surface water run-off;
- A significant boost for the local economy through additional spending power, with spin-off benefits for local businesses;
- The design is integrated into the existing wider PROW network and provides for well-connected street patterns and sustainable walkable neighbourhoods. This delivers high quality, safe and direct walking, cycling and public transport routes;
- Easy access to schools, local shops, services and other community facilities, thereby helping to retain working families and skilled residents in the area;
- Protects the amenity of adjoining and future occupiers by virtue of its design approach influenced by 'Secure-By Design' principles.

In summary, the proposal provides a wide range of benefits in accord with the various relevant parts of the NPPF and local policy requirements.



Axonometric looking south-eastwards







Access for habitat management

New Native tree woodland planting

School Extension Allocation Site

Conserved and managed meadows

SUDs

New native tree woodland planting, green infrastructure and habitat connectivity around and through site

Hall End Road

Residential

New native tree woodland planting and green infrastructure (Marston Vale Forest Plan Objectives)

LAP

Habitat Connectivity

New Pond

Conserved and managed meadows

New Pond

Existing Pond

School



EP3

REASON: To ensure an energy efficient and sustainable development in accordance with Policies CP21 (and CP26) of the Core Strategy and Rural Issues Plan 2008, Policy AD2 of the Allocations and Designations Plan 2013, saved Policy BE8 of the Bedford Borough Local Plan 2002 and the Policy Statement Update - Housing Standards 2015.

5. **APPLICATION NO: 19/00894/MAO**    **RECOMMENDATION: Permit subject to a Planning Obligation**    **(FORMERLY DEFERRED FOR SITE INSPECTION)**

**OFFICER:** Mr Alastair Wren

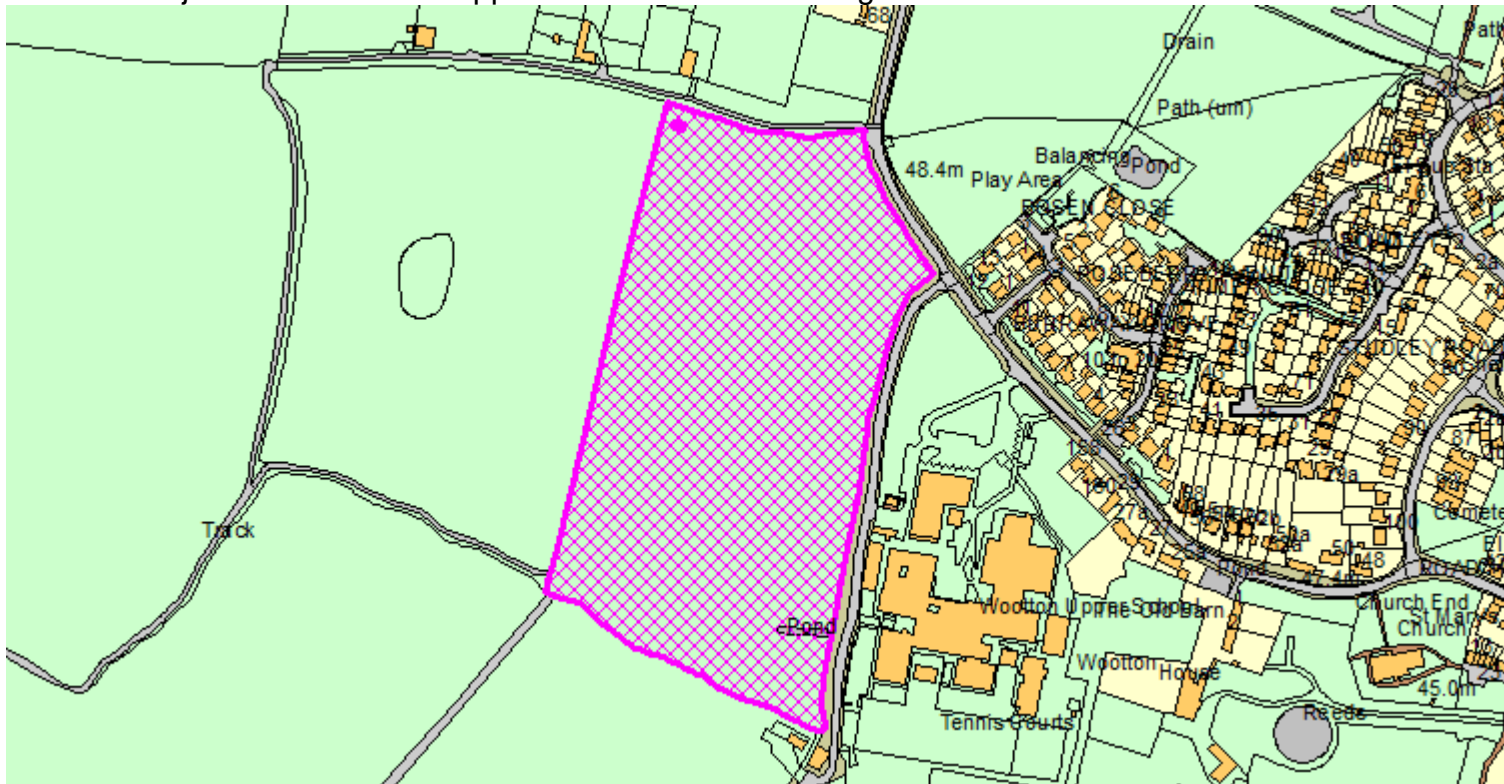
**APPLICANT:** Hollins Strategic Land LLP

**EXPIRY DATE:** 22 July 2019

**LAST DATE FOR COMMENTS:** 24 September 2019

**PROPOSAL :** Outline application with all matters reserved except access for the erection of up to 81 dwellings.

**LOCATION :** Land Adjacent To Wootton Upper School And Arts College Hall End Road Wootton Bedfordshire



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## **SITE DESCRIPTION and PROPOSED DEVELOPMENT**

The site is located on land to the western side of Wootton Village and is approximately 6.5 hectares in size. It is currently being used for grazing of horses and is not considered to be previously developed land. The site is a designated County Wildlife Site and is to the southern side of Wootton wood which is an ancient woodland. Wootton is identified as a Key Service Centre within the Growth Area for the Borough as set out in Policies CP3 and CP4 of the Core Strategy and Rural Issues Plan (2008).

Adjoining land uses to the east of the site, across a tarmac driveway, is Wootton Upper School which contains a mix of education buildings built mainly in red brick, flat roofed in design and up to two storeys in height. The access track also serves Wootton Park Farm comprised of a range of buildings set to the south of the site. To the southern side is also Wootton Wood. To the North East of the site, the settlement of Wootton has recently been expanded towards this site with the construction of 58 dwellings (planning ref no. 14/02939/MAF) which was allocated through the local plan process by Policy AD3 of the Allocations and Designations Plan. Adjoining that and opposite the application site is a triangular parcel of land which is allocated by the same policy for a school extension site which is currently undeveloped. To the northern edge runs a public bridleway on the opposite side of a mature hedge beyond which is further agricultural land and a row of houses which front Hall End Road. To the west is further paddock/farmland.

Public right of way (PROW) Wootton 4 (A and B) runs within the site along the northern and western field boundaries. This bridleway joins with Hall End Road via a gate to the northeast boundary of the site and continues as bridleway Wootton 5(A) via a gate to the south west of the site and then along the northern edge of Wootton Wood. PRoW Wootton 11 (A), the long distance John Bunyan Trail, runs to the north of the site on the opposite side of the northern field boundary. Footpath Wootton 4 (B) runs on the western side of the site boundary within the field immediately to the west of the site. This joins with Wootton 4 (B) within the site via the field gate to the northwest corner of the site.

The National Cycle Route 51 follows Hall End Road.

The village of Wootton is located to the south west of Bedford and is served by a rural road network. The site lies outside the Settlement Policy Area for the village, although it immediately adjoins it. The site is located within the boundaries of the Forest of Marston Vale.

## **RELEVANT PLANNING HISTORY WITHIN THE LAST 5 YEARS**

14/01907/FUL	Application Permitted	Erection of agricultural tractor shed
14/01974/FUL	Application Permitted	Single storey front extension.
17/02714/FUL	Permitted (CIL liable)	Conversion of agricultural barn to dwellinghouse, including new access track onto Hall End Road.

## **RELEVANT PLANNING POLICIES**

<b><i>Policy:</i></b>	<b><i>Description:</i></b>	<b><i>Document:</i></b>
AD3	Land at Hall End Road Wootton	Allocations and Designations Local Plan
CP3	Location of Development in Growth area	Core Strategy & Rural Issues Plan
BE23	Protection of Archaeology	Bedford Borough Local Plan
BE24	Protection of Ancient Monuments	Bedford Borough Local Plan
BE25	Recording of Archaeology	Bedford Borough Local Plan
CP1	Spatial Strategy	Core Strategy & Rural Issues Plan
CP2	Sustainable Development Principles	Core Strategy & Rural Issues Plan
CP4	Key Service Centres in the Growth Area	Core Strategy & Rural Issues Plan
CP5	Sequential approach to the allocation of	land for residential and employment development in the growth area. Core Strategy and Rural Issues Plan 16th April 2008
CP6	Scale pace of housing development in GA	Core Strategy & Rural Issues Plan
CP7	Meeting housing needs	Core Strategy & Rural Issues Plan
CP8	Affordable housing in the borough	Core Strategy & Rural Issues Plan
CP12	Settlement policy areas	Core Strategy & Rural Issues Plan
CP13	The countryside & development within it	Core Strategy & Rural Issues Plan
CP21	Designing in quality	Core Strategy & Rural Issues Plan
CP22	Green infrastructure	Core Strategy & Rural Issues Plan
CP23	Heritage	Core Strategy & Rural Issues Plan
CP24	Landscape protection and enhancement	Core Strategy & Rural Issues Plan
CP25	Biodiversity	Core Strategy & Rural Issues Plan
CP26	Climate change and pollution	Core Strategy & Rural Issues Plan
CP29	Accessibility	Core Strategy & Rural Issues Plan
CP30	Developer contributions	Core Strategy & Rural Issues Plan
CP31	Plan, monitor and manage	Core Strategy & Rural Issues Plan
AD25	Forest of Marston Vale	Allocations and Designations Local Plan
AD24	Green Infrastructure Opportunity Zones	Allocations and Designations Local Plan
AD36	Pedestrian routes	Allocations and Designations Local Plan
AD39	Cycling	Allocations and Designations Local Plan
NE03	County Wildlife Sites	Bedford Borough Local Plan
NE04	Retention trees, hedges, woodland	Bedford Borough Local Plan
NE06	Woodland	Bedford Borough Local Plan
NE10	Nature Conservation	Bedford Borough Local Plan
NE12	Early Landscaping	Bedford Borough Local Plan
NE13	Landscape Safeguards	Bedford Borough Local Plan

NE16	Flood Plain & Habitat Protection	Bedford Borough Local Plan
NE20	Landscape/environmental benefits	Bedford Borough Local Plan
NE24	Water Resources	Bedford Borough Local Plan
BE08	Energy Efficient Layouts	Bedford Borough Local Plan
BE11	New Development in Conservation Areas	Bedford Borough Local Plan
BE09	Character of Conservation Areas	Bedford Borough Local Plan
BE21	Setting of Listed Buildings	Bedford Borough Local Plan
BE23	Protection of Archaeology	Bedford Borough Local Plan
BE24	Protection of Ancient Monuments	Bedford Borough Local Plan
BE25	Recording of Archaeology	Bedford Borough Local Plan
BE29	Promotion of Good Design	Bedford Borough Local Plan
BE30	Control of New Development	Bedford Borough Local Plan
BE31	Urban Design Principles	Bedford Borough Local Plan
BE32	Development in the Urban Fringe	Bedford Borough Local Plan
BE35	Achieving Quality in Residential Layouts	Bedford Borough Local Plan
BE38	On and Off Site Landscaping	Bedford Borough Local Plan
H26	Housing in the Open Countryside	Bedford Borough Local Plan
T15	Car Parking Standards	Bedford Borough Local Plan
AD28	Provision open space built facilities new dev	Allocations and Designations Local Plan
BE40	Trees	Bedford Borough Local Plan
AD28	Provision open space built facilities new dev	Allocations and Designations Local Plan
CP30	Developer contributions	Core Strategy & Rural Issues Plan

## **CONSULTATION RESPONSES**

### **Wootton Parish Council**

#### **Objects:**

The site has not been put forward during any Bedford Borough Council Call for Sites consultations and does not feature in the Borough Council's emerging Local Plan 2030. The same Local Plan 2030 details no further development within Wootton. This site is large and development in this location would be out of character with the immediate built form of Hall End Road, Wootton extending the built form out of the village. The application is premature pending the adoption of the Wootton Neighbourhood Development Plan. Parking issues will increase in an area already suffering with congestion and poor infrastructure in terms of highways - demonstrating a highway safety issue. Vehicular access to/from the proposed site (close to a blind bend) raises health and safety issues - demonstrating a further highway safety issue. Due to its distance from the village centre and likely highway issues, it is not considered to be suitable for residential development.

The proposal will have an adverse effect on the street scene. The proposal will have an adverse effect on noise and air pollution levels. The proposal will lead to a loss of important trees (Wootton Woods) - demonstrating a nature conservation concern as the area is recognised as a County Wildlife Site.

**Archaeological Officer**

No objection subject to conditions. This application has been identified by the Bedford Borough Historic Environment Team (Archaeology) as being located in an area with archaeological interest. The application is accompanied by a desk-based assessment prepared by CgMs Consulting together with a report detailing the results of a geophysical survey undertaken by SUMO Services Ltd.

Checking the current Historic Environment Record shows that the entry for ridge and furrow on this site has been removed following completion of the recent Bedford Borough National Mapping Programme (NMP) project for this area (an analysis of historic and modern aerial photographs) which failed to identify the earthworks as being substantially intact here. In addition to this a recent survey of ridge and furrow in Bedford Borough has been undertaken (Albion Archaeology 2017) and this site was visited during the survey. The site visit identified some trace elements of surviving ridge and furrow in the western part of the field however the condition was described as being very poor.

Only trace elements of the former ridge and furrow earthworks in this field now survive. These remains can be considered to have minimal heritage significance and do not represent a constraint on development of the site.

The geophysical survey was done which identified the ridge and furrow earthworks and failed to highlight any significant focus of archaeological activity in the proposed development site. The results indicate that the development site is unlikely to contain remains of such significance as to prevent development of the site it should be highlighted that geophysical surveys can be misleading. As such a further stage of intrusive trial trench evaluation is still required here.

**Anglian Water**

Desktop analysis has suggested that the proposed development will lead to an unacceptable risk of flooding downstream. We therefore highly recommend that you engage with Anglian Water at your earliest convenience to develop in consultation with us a feasible drainage strategy.

The foul drainage from this development is in the catchment of Bedford Water Recycling Centre which currently does not have capacity to treat the flows the development site. Anglian Water are obligated to accept the foul flows from the development with the benefit of planning consent and would therefore take the necessary steps to ensure that there is sufficient treatment capacity should the Planning Authority grant planning permission

**HECS (Env Health & Trading Standards)**

**British Horse Society**

No objection to the application.

Comments: The application site is bounded on one side by a Bridleway (BW4) and part of the John Bunyan Trail.

Currently there is a gate at the access point from Hall End Lane to the Bridleway from the road. As the designation of the field will be changing to residential and no livestock would be present, we therefore request that the gate be removed to allow easier access for all equestrians and other users. It is noted from the application documents that the landscaping scheme incorporates tree planting on the boundary of the site. Please be aware that any tree planting must not obstruct the line of the bridleway or reduce the width in any way. If it is necessary to divert any part of the bridleway then a diversion order must be made. It is the responsibility of the Borough council to ensure that the bridleway surface is not compromised or changed without consultation to the Rights of Way team and the BHS. The most ideal surface is grass, however if the bridleway becomes shielded by tree canopy then it may stay wet and become boggy. This would then need to be addressed.

Please ensure that during the construction phase of the development that full access is maintained to the bridleway and that consideration is given to passing horses (ridden or driven), both by those using the bridleway and on the passing road as the amount of large vehicles will increase during this time.

**Conservation Officer**

The proposal site currently makes a very minor contribution to the significance of the Wotton Conservation Area and St Mary's Church. Both assets are best experienced in close proximity and both benefit from an enclosed character formed by natural screening and the nature of the road network. Additionally, intervening development has reduced the contribution made by the site to the significance of these assets. Therefore, providing that development is set back from Hall End Road on the approach to these assets and is domestic in scale, the proposal is unlikely to result in harm. The indicative plans show this to be the case, and whilst improvements could be made (more effective screening along northern boundary) no harm is likely to occur.

The application is therefore in line with Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990; policy CP23 of the Bedford Borough Core Strategy & Rural Issues Plan and saved policies BE11 and BE21 of the Bedford Borough Local Plan 2002, as well as chapter 16 of the NPPF.

**Drainage Engineer**

Do not wish to restrict the grant of planning permission: There is sufficient room on site to accommodate Sustainable Drainage Systems on site. There is mention of discharging surface water to the adjacent ditch. In any reserved matters application it should be established whether the ditch has a connection to a watercourse, or is only a longitudinal soakaway.

**Environment Agency**

No objection to the application.

The application states that the method of foul drainage is "unknown". If a connection to the mains sewer is not proposed we would wish to be re-consulted in order to object to this planning application.

The water environment is potentially vulnerable and there is an increased potential for pollution from inappropriately located and/or designed infiltration (SuDS). We consider any infiltration (SuDS) greater than 2.0 m below ground level to be a deep system and are generally not acceptable. If the use of deep bore soakaways is proposed, we would wish to be re-consulted. All infiltration SuDS

require a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels. All need to meet the criteria in our Groundwater Protection: Principles and Practice (GP3) position statements G1 to G13.

Advice offered on pollution prevention measures.

**Highways (Development Control) Officer**

No objection subject to conditions:

Details of junctions will need to be conditioned

Links to the public rights of way will be required

Bus stop improvements will be required

The indicative layout is not acceptable however as this is not being considered the reserved matters will need to revise this.

The access to the site will require a raised table area, parking restrictions for 25m on Hall End Road opposite the site entrance, a new low level pedestrian crossing point from the site and bollards to prevent people walking along the highway verge.

With these measures the implementation of the proposed development would not have a severe negative impact upon the highway network when considering traffic across the day however there are issues at the busiest times of day (often in relation to the adjacent school) which need to be addressed in order to make access to and from this development safe and practical for pedestrians and motorists entering and leaving the site. This includes a raised access junction on Hall End Road incorporating uncontrolled/informal pedestrian crossing facility (to access the only footway into the village & school) and parking restrictions to the north-west of the proposed access.

The Board has no comments to make with regard to this planning application.

**Beds/River Ivel Internal Drainage Board  
Forest Of Marston Vale**

The site is a County Wildlife site which raises concerns about the loss of the neutral grassland. There is also the potential impacts on the adjacent woodland. The proximity could result in predation from cats of ground nesting birds, small mammals and amphibians. The Forest have strong concerns regarding the negative impacts this application will have on the County Wildlife Site.



**Ramblers Association  
Scientific Officer**

No comments received.

No objection subject to conditions: the submitted desk top study concludes that further works are recommended with intrusive ground investigations comprising trial pits and lab testing. This should be secured prior to development.

**Arboricultural Officer - HER  
Team**

In the respect of existing 'trees' and the potential for them to be compromised by development, the indicative layout suggests that this is not an issue, as large buffer areas have been indicated around the periphery allowing for development to occur a significant distance outside of any Root Protection Area.

The proposed access into the site requires the removal of a section of hedgerow, as the land is currently agricultural, intact and over 20m in length therefore all hedgerows fall under the hedgerow regulations 1997 and an assessment under the eight criteria needs to be provided prior to the access being agreed. While it is accepted this is an outline application once the principle of planning has been approved there will be nothing to prevent the total removal of the hedgerows on the site once reserved matters are processed.

There is scope for a robust landscaping scheme for the site which will be important due to the character of the area being rural. Where trees are planted within close proximity to built structures and within areas of hard landscaping the tree pit design needs to be incorporated as part of the infrastructure planning and design stage of any new development.

**The Wildlife Trust**

The current National Planning Policy Framework (NPPF) states that all new developments must result in measurable net gains for biodiversity (paragraph 170) and we would consider the proposals, albeit extensive, do not go far enough with regard to the semi-improved grassland, which is also recognised as part of a County Wildlife Site (CWS).

We are broadly supportive of all the measures proposed in the Ecological Appraisal but there are certain points that we would like to highlight. The Ecological Appraisal briefly mentions that the retained and new ponds will be protected from pollution and sedimentation during construction through implementation of best practice and the appropriate method statements. We would like to see more detail about what these best practice measures are in the CEMP given that the existing pond is of NERC Act (2006) Priority habitat status and it is an important component of the habitat mosaic in the wider area. 2019 records show the presence of indicator plants of good quality habitat including a species of stonewort (*Chara vulgaris*) found in the pond.

**Education (Planning) -**

From a pupil place planning and education perspective, it is always desirable that lower school places are provided locally. As such, Education Officers wouldn't encourage applications that result in pupils having to attend a school where there is a necessity to provide ongoing school transport provision.

It is however accepted that capacity may be available within neighbouring villages although this would require young children to travel to school, which would be inconvenient for families, create additional traffic on rural roads and have financial implications for the borough council due to the need for school transport.

The solution albeit not ideal is to seek CIL contributions towards Education infrastructure and a separate s106 contribution for transport costs. On this basis, Education would seek financial contribution for the pupil yield multiplied by the annual cost of transport for the period of years pupils would be expected to attend school outside of the village.

**Police Architectural Liaison Officer**

Bedfordshire Police object to this application, which appears to substantially conflict with Secured By Design, the NPPF, and county-wide agreements between the force and the local planning authorities. The application doesn't appear to make any reference to community safety which is surprising given the inherent crime risk which can be associated with 81 dwellings. The indicative layout would appear to be a permeable perimeter block layout, which compounds this further.

**Access Officer**

Recommends a condition to secure 10% Mobility housing,

**THIRD PARTY COMMENTS**

The application was advertised by site notices and neighbour letters.

71 letters of objection were received to the consultations (some are duplicate) and none in support.

An E petition with 8 signatures was received through the Council web site.

Wootton Academy Trust also objects to the proposal.

Issues raised are grouped under several categories below.

General:-

- \* Over development of a small rural village (Fields Road north and South already taken place).
- \* Encroaches into a natural boundary between Wootton and Hall End.

- \* Wootton does not have the facilities or infrastructure to support more houses, the shop that is there runs out of basics. New shopping facilities under existing planning permissions have not yet been built. Until such time as they are available no new planning permissions should be granted, lack of education spaces, access to medical facilities are stretched already with the existing population.
- \* The village has had more than its share of development both domestic and commercial and the infrastructure does not exist to support any more.
- \* Loss of beautiful field.
- \* Increase in noise and air pollution levels for residents, students and staff.
- \* Plans are not accurate and include land in private ownership. There is no right of access from the site to the east.
- \* As this is outline houses could move within the site.

#### Policy:-

- \* Not in the 2030 local plan allocation and was not put forward in the 'call for sites' site is entirely speculative.
- \* Site is a designated County Wildlife Site (Wootton Wood).
- \* It is outside of the Settlement Policy Area and in open countryside.
- \* Neighbourhood Plan - Wootton Parish has made good progress with the NDP therefore this application is premature pending adoption.
- \* The Parish Council has already carried out the site assessments and liaised with landowners and is preparing for the pre-submission consultation on the Neighbourhood Development Plan.
- \* Brownfield land should be preferenced over this green field site.
- \* The Council's Policy (AD43 Urban Open Spaces and Gaps) states that County Wildlife Site are considered to be 'urban open spaces' and "development will not be permitted on land designated as urban open space and gaps unless it can be demonstrated that the reasons for designation are not compromised or that other material considerations outweigh the need to retain the urban open space and gaps undeveloped." The proposed development will compromise the County Wildlife Site and there are no material considerations which outweigh the need to retain this County Wildlife Site.
- \* Application is premature pending the Neighbourhood Plan.

#### Education:-

- \* Lack of school capacity the schools cannot take more children.

#### Sustainability:-

- \* Site is 1km from the village centre and is not a sustainable location for development

#### Highways:-

- \* Traffic issues already exist with the school with congestion at peak times.
- \* Increased parking issues in the area which already suffers congestion, roads are narrow, deviate and often congested.
- \* There is the potential for increased inconsiderate and nuisance parking - affecting safety and the ability of parents to drop off and pick up children.
- \* Safety concerns for school children due to traffic increases due to this and school allocation site
- \* Safety of horse riders.
- \* The road surfaces are degrading, the roads are almost permanently being dug up and are in dire need of major resurfacing.
- \* Should the development go ahead the Section 106 Agreement should include necessary traffic/pedestrian safety measures.
- \* Any future planning permissions must include adequate parking to prevent additional parking on Hall End Road which currently takes place, causing additional hazards.
- \* Whilst there is only proposed pedestrian access from this development on to WAT land, over land owned by Wootton Farm, onto WAT's "Service Road", this road is nonetheless a private road.
- \* No buses serve the site.

#### Ecology:-

- \* Proximity to the ancient woodland.
- \* Area is regularly used by dog walkers and is home to wildlife.
- \* Loss of neutral grassland once grassland/pasture is removed it is difficult to repair.
- \* Proposal does not contribute to the Forest of MV in meaningful way.
- \* No indication of who will maintain ecological enhancements proposed.
- \* Loss of important trees.
- \* The proximity of the proposed development to ancient woodland is likely to incur adverse impact on the woodland and its fringe habitats due to increased disturbance and loss of grassland.
- \* Rabbits, deer, owls, hares, hedgehogs, badgers will be forced from their homes.
- \* GC Newts are documented within half a mile.

#### Heritage:-

- \* Loss of local historic interest brick making reported to have once taken place on the site.
- \* The Planning Statement refers to there being no evidence of ridge and furrow across the field. This is factually incorrect. On the ground there is clear visible evidence of ridge and furrow on site.
- \* The Wootton Conservation Area is the last bastion of what is left of the old village and should be preserved. Already the school traffic is eroding both this environment along with quality of life for residents.

#### Footways:-

- \* Impact on views over Hall End.
- \* Impact on Bridle path and the John Bunyan Trail and bridleway which is adjacent to the site.

#### Agricultural Land:-

\* The site is classified Grade 3 agricultural land. Although it is accepted that some loss of Grade 3 agricultural land locally is likely to be necessary to meet the likely allocated housing allocation, there are other sites closer to the village centre which are more sustainable with less visual and landscape impacts and with safer access options than this proposed site.

#### Character:-

- \* Out of character with the surrounding area.
- \* Development would link the Hamlet of Hall End with Wootton village.

#### Flooding:-

- \* Whilst expert comments indicate there is no flooding risk, our service road does flood in the autumn, winter and spring when there is heavy rainfall when there is heavy rainfall already. This water runs onto the school site and into the staff car park. The removal of green fields opposite the school will reduce the standing area for water and will inevitably exacerbate the situation.
- \* Concern is that water will naturally fall through into the southern area (which is shown on the plans with two additional ponds being created) which will then continue into land within our ownership to the south of the site (being Wootton Wood which is part of the County Wildlife Site).
- \* Any proposed drainage will need careful consideration to ensure that existing flooding and drainage problems are not escalated.

#### Other matters:-

- \* People are struggling to sell houses due to the new developments.
- \* Wootton does not need more houses.
- \* Told no more new houses before 2030.
- \* Loss of Countryside views.
- \* Should the development go ahead the Section 106 Agreement should stipulate either a local shop or a financial contribution to another shop within the village.
- \* Water mains bursting is becoming more frequent as infrastructure cannot cope. Water pressure is often low.

- \* Crime rate in Wootton has gone up with new houses.
- \* Council tax is increasing to support tackling crime.

## **ASSESSMENT OF APPLICATION**

### **1. CONTEXT & POLICY CONSIDERATIONS**

1.1 The application is reported to the Planning Committee for determination at the request of Councillor Wheeler, as neighbour objections have been received and because the site size, at 6.5 hectares, exceeds the threshold (set out in the Planning Committee's Scheme of Delegation) below which applications may be determined by officers.

1.2 The planning application seeks outline permission for the erection of up to 81 dwellings. The overall site size is 6.5ha with the developable area identified as being 3.02ha located towards the northeast of the site towards Hall End Road. At this time the size and scale of the properties proposed are not known. An indicative layout has been submitted to illustrate how the development could be laid out incorporating access, amenity and open space, ecology areas and landscaping on the site. The layout is however for illustrative purposes and all matters except the site access are reserved for future approval if outline permission is to be granted.

1.3 No Pre application advice was sought on the site.

1.4 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that proposals should be determined in accordance with the development plan unless material considerations indicate otherwise. For the purpose of this application the development plan comprises:

- The saved policies in the Local Plan (2002)(BBLP);
- The Core Strategy and Rural Issues Plan (2008) (CSRIP);
- The Allocations and Designations Local Plan (2013) (ADLP).

1.5 Other material considerations which also need to be taken into account include the National Planning Policy Framework (NPPF) (2019) and the associated Planning Practice Guidance (PPG) (first published in March 2014 but regularly updated), the Council's draft Local Plan 2030 (currently at the modifications stage), as well as Bedford Borough Council's adopted parking standards for sustainable communities Supplementary Planning Document (SPD) 2014, adopted design guidance Residential Extensions, New Dwellings and Small Infill Developments 2000, Open Space SPD 2013, Planning Obligations SPD 2014 and Achieving Quality in Residential Layouts SPD 1997.

1.6 Other material considerations can also be taken into account in decision making, such as planning history, but material considerations can encompass many things so are therefore determined on a case by case basis.

1.7 During the course of the application a revised transport assessment (Dated July 2019) and framework Travel plan was received to address initial Highway Officer concerns which have been re-advertised.

## 2. MAIN ISSUES ARISING

### Principle of Development

2.1 Wootton is identified as a Key Service Centre in the Growth Area by current Policy CP4 of the CSRIP. This identifies the village as a focal point for the provision of homes, jobs, facilities and services. Policy CP3, however, restricts growth to 'within the defined limits of the key service centre'. The site itself is located outside of defined limits of Wootton, which is the Settlement Policy Area (SPA) for Wootton. The SPA boundary for the village adjoins the site to the east and is tightly drawn around Wootton Upper School. So despite Wootton being within the growth area, by virtue of the site itself being outside the SPA it is located in the open countryside in policy terms. Policy CP13 states that development in the open countryside will only be permitted if it would be consistent with national policy.

2.2 Paragraph 77 of the NPPF (2019) states that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Paragraph 78 states that to promote sustainable development in rural areas, new housing should be located where it will enhance or maintain the vitality of rural communities.

2.3 Paragraph 79, however, is much more restrictive and seemingly draws a distinction between homes proposed in or close to rural settlements and those more remote. Paragraph 79 states that the development of isolated homes in the countryside should be avoided except where one of the closed list of circumstances applies, as follows:

- a) an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;
- b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;
- c) the development would re-use redundant or disused buildings and enhance its immediate setting;
- d) the development would involve the subdivision of an existing residential dwelling; or
- e) the design is of exceptional quality, in that it:

- is truly outstanding or innovative, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and
- would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.

2.4 It is therefore necessary to consider in the first instance whether the proposal is isolated. There is no definition of isolated in the NPPF but the recent Court of Appeal decision *Braintree District Council v SSCLG* [2018] EWCA Civ 610' has clarified that the term "isolation" simply connotes a dwelling that is physically separate or remote from a settlement because settlements are the preferred location for new housing development in rural areas. However, as settlement is also undefined in the NPPF, whether a proposed new dwelling is, or is not, "isolated" in this sense will be a matter of fact and planning judgment for the decision-maker in the particular circumstances of the case in hand (Braintree Paragraphs 29-31).

2.5 In assessing the application site in terms of 'isolated' the land falls immediately adjacent to Wootton Upper School on the edge of Wootton Village and is located in close proximity to housing on the north eastern side of the site. Wootton is also defined as a key service centre village (which is the preferred location for new rural housing pursuant to Policy CP14). The site therefore cannot be regarded as physically or functionally isolated from the settlement; as such the exceptional circumstances noted in Paragraph 79 of the NPPF do not need to be considered. It remains, however, that the principle of residential development in the rural area is still to be considered against the advice in Paragraphs 77 and 78.

2.6 Both Paragraphs 77 and 78 indicate that some villages should be able grow as long as the development is responsive to local circumstances and where the development will enhance or maintain the vitality of rural communities.

2.7 Wootton is considered to be a sustainable location (hence being a growth area) and there is no reason to argue that the development would not in principle enhance or maintain the vitality of the village. However, it has undergone a considerable growth in the last few years, in particular along Fields Road where there are still houses under construction, and for this reason the emerging local plan has resolved not to allocate any additional housing for the village. The emerging Local Plan 2030 was submitted for examination in December 2018 and the hearings have now finished and the consultation on proposed modifications has just been completed; it is therefore at a fairly advanced stage and is anticipated for adoption within the next 2-3 months.

2.8 Despite the lack of allocation for Wootton, this does not mean that development should not occur. Windfall sites are to be considered on their merits and it also remains open to the Neighbourhood Plan Group to allocate their own sites (or not), which is an option supported by the emerging Local Plan.

2.9 The Wootton Local Neighbourhood Plan Group has started work on the neighbourhood plan however this is still at a fairly early stage with no public consultation having taken place and it has not been through an examination and therefore at this time this cannot be given weight in the planning balance.



2.10 Notwithstanding, as noted in Section 1, Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that proposals should be determined in accordance with the adopted development plan unless material considerations indicate otherwise. The NPPF is a notable material consideration and Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development. It adds that for decision-taking this means:

“c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

2.11 While adopted Policies CP3 and CP13 identify that residential development outside settlement policy areas like this should be restricted, unfortunately those policies are considered to be out of date by virtue of the fact that the Council is unable to demonstrate a 5 year supply of housing delivery sites, which means that Paragraph 11(d) of the NPPF applies in this case, which means that the balance at the start of the assessment must now be tilted in favour of approval unless the application of policies in the NPPF that protect areas or assets of particular importance provide a clear reason for refusing the development proposed or the adverse impacts arising from development would significantly and demonstrably outweigh the benefits (i.e. tip the scales the other way) to justify a refusal of planning permission.

2.12 A consideration of all the relevant issues surrounding the development of this site is therefore required in order to undertake this balancing exercise.

### Character and Appearance

2.13 Paragraph 170 of the NPPF states that the open countryside should be recognised for its intrinsic character and beauty. Landscape considerations will therefore play a significant part in the determination of planning proposals and consideration will need to be given to the impact of proposals on the surrounding area in terms visual intrusion and loss of landscape features.

Policies BE29 and BE30 of the Bedford Borough Local Plan (2002) and CP21 of the Core Strategy and Rural Issue Plan (2008) expects all new development to be designed to the highest standards whilst Policy BE30 sets out a list of twelve (12) material considerations against which all applications will be considered including the visual impact of development, relationship with townscape and landscape, scale, density, massing, height, materials and layout, quality of public spaces, traffic impacts, accessibility, access arrangements, noise, smells and health and safety, neighbourhood disturbance, waste and the adequacy of existing infrastructure.

2.14 The Council's CSRIP document advises that landscape enhancement is an important issue in the rural area of the borough where there are smaller villages and the impact of development could have a detrimental impact on the landscape if not appropriately controlled. Local Plan Policy BE32 states that where new development is permitted on the edges of the rural or urban area, or of villages, it should be carefully designed to minimise the impact of development on the surrounding land. Policy CP24 also seeks to ensure that new development protects and enhances the character of the landscape.

2.15 Neighbours have objected to this proposal on the basis of the loss of the rural character, encroachment of built development into the Countryside and also the closing of the gap between Wootton and properties in the hamlet of Hall End.

2.16 A landscape and visual impact assessment has been submitted with the application to assess the impact of the development (dated 8th April 2019) on the landscape and character of the area. The assessment looking at the existing landscape outlines, based on the Bedford Borough Landscape Character Assessment. This identifies that the southern section of the proposed site lies predominantly within the general Landscape Character Type 5: Clay Vales and specifically within the North Marston Clay Vale Landscape Character Area. The northern section of the site lies just within the general Landscape Character Type 1: Clay Farmland and specifically the Cranfield to Stagsden Clay Farmland Landscape Character Area. The overall landscape strategy for the Cranfield to Stagsden Clay Farmland character area is to 'enhance and renew the landscape and conserve its rural agricultural character' and the overall landscape strategy for the North Marston Clay Vale Landscape Character area is 'to continue to enhance and renew this post-industrial landscape'.

2.17 The applicants have assessed the site from viewpoints within a 2.5km radius of the site looking at the landscape sensitivity. The site has been described as:

"generally featureless, apart from a small pond and associated vegetation to low lying ground towards the southeast boundary. Lengths of temporary paddock fencing, a water trough and a small and slightly dilapidated shed to the northern section of the site are associated with horse grazing."

2.18 In assessing the impacts of the development the report identifies that the residential receptors and the potentially most sensitive group are the nearest houses which are the closest to the site. These will have views of the development over the hedge. Views from these properties are currently predominantly rural in the direction of the site. These properties have been categorised as having a

High Sensitivity with those further away or with more oblique views including within Hall End being categorised as having a medium sensitivity. The indicative layout shows the development closest to the northeast corner of the site and the change for those residents will be from an open rural scene (albeit within the context of the existing school building) to a view onto a built residential edge behind a landscape buffer.

2.19 There are footpaths immediately adjoining the site (PRoWs) including the John Bunyan long distance trail which will also be impacted by the development. These are categorised as having a high sensitivity to the development. The report concludes the development is going to be visible to users of the pathways but it will be viewed as a natural extension to the settlement of Wootton as it will sit adjacent to the school, the recently completed housing development and opposite the school expansion site. The 100m gap proposed from Wootton Wood will maintain a large gap to the development from the wood.

2.20 The impact on Wootton Upper School is classified as Medium to Low Sensitivity with views from the School grounds. Road users have been identified as having a medium sensitivity. It is highlighted that the site will be viewed within the context of the new residential development and school.

2.21 Taking into account the Landscape and Visual Appraisal report and assessing the site it is clear that there will be a change in character of the land from open paddock to a developed site. It will however sit within the context of surrounding built development being enclosed by the new housing to the north east, Wootton Upper School to the east and Wootton Wood to the South. The land is aligned visually and geographically with the built edge of the settlement of Wootton.

2.22 The indicative layout Cranfield to Stagsden Clay Farmland LCA identifies erosion of hedgerows and hedgerow trees as a strategic sensitivity within this landscape, as well as the potential neglect and mismanagement of woodland. The proposal retains hedgerow boundaries and reinforces vegetation here with native tree and woodland planting to the perimeters of the developable area. The developable site area is pulled away from the northern edge of Wootton Wood and the buffer space between allocated as an open, managed meadow land area.

2.23 Visual sensitivities associated with the LCA include long ranging views to wooded horizons and across lower lying rural landscape of the North Marston Vale (5d). The applicants have demonstrated how the developable area would be aligned with the edge of Wootton and have little impact on the long ranging views to the east.

2.24 Elements identified as contributing to future change in the landscape include the potential further linear expansion of development along road corridors. The illustrative layout shows how only a small section of the developable area is aligned with Hall End Road, and this area is set well back with a landscape buffer and SUDs zone. These features would also contribute to the avoidance of potential coalescence between the new development and the hamlet of Hall End to the north of the site.

2.25 The North Marston Clay Vale LCA also identifies the needs to conserve and enhance the green infrastructure of the many PRow in the area. The Masterplan demonstrates how a new landscaped footpath fringes the development site and connects the new homes with built form to the edge of settlement. The proposed development will not obstruct the existing PRow within the northern and western site boundaries; this bridleway will be managed to ensure it remains suitable for use, with users encouraged to respect the areas of protected Meadow land.

2.26 Visual sensitivities of this LCA include views from areas that border the prominent landform of the Cranfield Ridge and how contrasts here between the landform, woodland and undeveloped lower slopes should be maintained, and development which obstructs from these views should be avoided. Setting the built form back from Hall End Road and incorporating a strong landscape buffer of native tree and woodland planting to the east of the site, would help to ensure a predominantly green view is maintained towards the Cranfield Ridge from the east.

2.27 The presence of existing large vegetation groups surrounding the site, the adjacency of a settlement edge and a rising topography to the west means that the development of the site would have limited visual influence on the surrounding environment.

2.28 The incorporation of a landscape buffer to the perimeter of the site as well as potential for larger tree species planting within the development here will further break up the visual mass of built form and screen views of the development as it matures over time.

2.29 Carefully assessing the site from the surrounding area and the submitted Landscape and Visual Appraisal it is concluded that the development, whilst resulting in a change in the character of the area from the rural landscape to a residential one, would not cause a demonstrable harm to the wider character of the area or Wootton which would justify a refusal of planning permission. The development will be viewed within the context of the existing school, the new housing development and the future school expansion site. It is bound by Hall End Road and is screened to the south by Wootton Wood.

2.30 A high number of neighbours have objected to the development on the loss of the rural character of the area and the impact on views across the site, however as set out the proposal tries to retain the rural character edge, and the loss of a particular view to residents is not a planning consideration.

#### Amenities of Neighbours

2.31 The nearest residential properties to the site are located on the opposite side of Hall End Road and further to the north in Hall End separated by agricultural fields with boundary hedges. Whilst an indicative layout has been submitted at this stage only limited weight can be given to this as the details are not being agreed. It does however demonstrate that up to 81 dwellings could be accommodated on the site along with suitable boundary treatments and landscaping, to ensure that there is suitable separation from the existing neighbours to prevent any unreasonable loss of privacy, impact on daylight or sunlight or being overbearing.

The additional traffic being generated by this development within the context of the existing traffic on Hall End Road would not be unreasonable.

2.32 The proposed access to the site is opposite land which is allocated for a school expansion site which development of the application site would not compromise and will not have an impact on amenity.

2.33 Based on the information submitted to date it has been demonstrated that the proposal could accord with policies BE29, BE30 and BE37 of the Bedford Borough Local Plan (2002) and CP21 of the Core Strategy and Rural Issue Plan (2008).

2.34 A condition is proposed for a construction management plan which would control the delivery of materials and parking within the site; however, an element of noise is inevitable as with any new development during the construction phase and noise during construction is not a sufficient ground for refusing the proposal. The actual construction on site and any noise generated however falls outside of the planning remit and would be controlled by on site management and Environmental Health legislation if for example builders were working outside of reasonable daytime hours. The Council's Environmental Health Officer whom would investigate any complaints under Environmental Legislation has been consulted on the application and raises no objection.

2.35 In this case the application seeks outline planning permission with only the site access being agreed. An indicative layout has been submitted which demonstrates that a layout for 81 properties is possible which would meet all of the Councils standards in terms of privacy distances and daylight and sunlight therefore no objection is raised on this basis.

#### Highway Access and Parking Layout

2.36 BBLP Policies BE30 and CSRIP Policies CP2, CP28 and CP29 of the Core Strategy seek to ensure that new developments provide adequate and sustainable transport infrastructure. In support of the planning application the applicant has submitted a Transport Assessment, Safety Audit and a Travel Plan. The application seeks approval of the access arrangements for the development (although the internal roads and parking courts are not being considered at this time). The application site would be accessed from the south-west side of Hall End Road which is an adopted unclassified road subject to a 30mph speed restriction. On the south-west side of the carriageway there is a grass verge and ditch.

2.37 A large number of the objections received to this development relate to the highways and parking situation and in particular the close proximity to Wootton Upper School and the traffic generated at drop off and pick up times which can reduce the carriageway of Hall End Road to single lane only. The School has expressed concerns about pupil safety resulting from the additional traffic generated by this development. The British Horse Society has raised a concern about safety during construction.

2.38 The submitted Transport Assessment (TA) provides traffic flow information advising that the average daily traffic flow on Hall End Road is around 1,000 vehicles per day which is considered a relatively low flow, albeit with its highest concentration of existing traffic around each end of the school day.

2.39 The TA indicates that the trip generation that would result from the development would be around 45 and 42 vehicle movements in the AM and PM peak hours respectively. The peak hours in relation to traffic generation due to the development are 8AM to 9AM and 5PM to 6PM. The daily total would be in the order of 395 trips. This would be 1 additional vehicle every 2 to 3 minutes on average across the day (with around 1.4 vehicles per minute in the am/pm peak hours) on any particular section of Hall End Road.

2.40 Of the traffic entering or exiting the site it is stated that there would be an approximate 50 / 50 split of traffic heading north-west towards Keeley Lane and Bedford and south-east towards the centre of Wootton, but even if the split were different it would not have a detrimental effect on junction capacities.

2.41 The TA provides the results of capacity calculations for the following junctions:

Site access with Hall End Road;  
Bedford Road, Cranfield Road and Church Road; and  
Bedford Road and Fields Road.

Each of the junctions was assessed for the year 2025 with baseline traffic, currently committed developments and the proposed development.

2.42 The report concludes that all of the junctions would operate within capacity with the development in place with the two existing junctions only having a small reduction in available capacity due to the proposed development. The junction with Hall End Road with Keeley Lane has not been assessed but the additional vehicle every 2 or 3 minutes would not have a significant impact upon its operation.

2.43 The application has been carefully assessed by the Highways Development Control Officer who advises that subject to highways mitigation measures the implementation of the proposed development would not have a severe negative impact upon the highway network when considering traffic across the day however there are issues at the busiest times of day (often in relation to the adjacent school) which need to be addressed in order to make access to and from this development safe and practical for pedestrians and motorists entering and leaving the site.

2.44 There are already existing parking restrictions in proximity of the Wootton Upper School access and the new housing development junction opposite. There are however currently no parking restrictions by the proposed site access section of Hall End Road and parents have been observed parking there. Due to the parking that occurs in the vicinity of the bend to the north-west of

the access which results in single-file around the bend with minimal visibility it would be potentially unsafe for traffic turning left out of the new development junction which may then be forced to reverse back if encountering oncoming traffic overtaking parked cars which at busy times of day would not be safe. Furthermore, any parking opposite the junction would affect access to and from the site.

2.45 Consequently to make the access safe and acceptable double yellow lines are required which would extend from the existing double yellow lines on the road on the north-east side of the Hall End Road, and from the end of the School Keep Clear zig-zag markings on the south-west side around the bend to a point approximately 25m past the farm access on the outside of the bend. This can be conditioned but will have implications for parents dropping off pupils at the school.

2.46 The Highways Development Control Officer has identified that as part of this development a new dropped kerb pedestrian crossing point will also be required linking the development to the existing footpath on the northern side of Hall End Road. To prevent residents attempting to walk along the narrow verge from the development to the school this will also require bollards to be installed along the front of the site and the school on highways land. The traffic will also need to be slowed down which will require a raised junction table at the site access. This would both slow traffic down entering the village and provide the level crossing point. This can improve safety for the school.

2.52 A Framework Travel Plan has been produced and a full Travel Plan will be required prior to occupation with targets and specific dates for the actions and include the latest version of the Bedford and Kempston Walking and Cycling Map along with reference to the Travel Bedford website.

#### Rights of Way connections

2.47 There is public right of way in the form of a bridleway within the site alongside the western and northern boundaries as well as rights of way running on the opposite side of those boundaries with connections between them. The footpath on the north side of the northern boundary (Footpath 11) is part of the promoted John Bunyan Trail. Convenient direct connections (dedicated as public highway) from the development will therefore be required to the PRow in the north-west and south-west corners of the site as part of the reserved matters application.

#### Public Transport

2.48 The Transport Assessment makes reference to the location of bus stops and provision of bus services. There are existing bus stops on Cause End Road around 530m from the site entrance and hence most of the proposed dwellings would be over 700m, which is significantly more than the normal maximum distance of 400m. However; the bus service at the stops is frequent and the stops have been recently upgraded. There are also request stops by The Chequers Inn on Hall End Road that are around 360m from

the site entrance. These request stops do not have pole, timetable or shelter. These bus stops therefore require some upgrading. A section 106 contribution would be required for £10,000 in accordance with advice from the Public Transport Team.

2.49 Having carefully assessed the application with access to be agreed as part of this proposal the Highways Development Control Officer has raised no technical objections to the proposal subject to all of the mitigation measures highlighted in the report (double yellow lines, dropped kerb crossing, installation of bollards and a traffic table being installed) and has suggested conditions to secure the final details.

2.50 Should Members not be satisfied with the Highway improvement works required to make the access acceptable then this application would have to be refused as access is being considered at this time and therefore should not be conditioned to be repositioned elsewhere.

### Archaeology

2.51 Policies BE23, BE24 and BE25 (Archaeology) state that proposals which would have an adverse effect on scheduled ancient monuments and other important archaeological sites and monuments, and their settings, will not be permitted except in circumstances where the adverse impact of a proposal can be overcome and the site or monument physically preserved in situ and that the Borough Council will have regard to the need to protect, enhance and preserve sites of archaeological interest and their settings. A neighbour has raised concerns about the impact of the development on ridge and furrow features on the site.

2.52 This application has been identified by the Bedford Borough Historic Environment Team (Archaeology) as being located in an area with archaeological interest. The application has been accompanied by a desk-based assessment prepared by CgMs Consulting together with a report detailing the results of a geophysical survey undertaken by SUMO Services Ltd.

2.53 The Officer advises that the current Historic Environment Record shows that the entry for ridge and furrow on this site has been removed following completion of the recent Bedford Borough National Mapping Programme (NMP) project for this area (an analysis of historic and modern aerial photographs) which failed to identify the earthworks as being substantially intact here. In addition to this a recent survey of ridge and furrow in Bedford Borough has been undertaken (Albion Archaeology 2017) and this site was visited during the survey. The site visit identified some trace elements of surviving ridge and furrow in the western part of the field however the condition was described as being very poor. No objection is therefore raised due to impact on the ridge and furrow.

2.54 The NMP Project also identified the cropmark of a probable Iron Age ditched banjo enclosure (BBHER22049) located c.230m to the west of the proposed development site. The cropmark is sub-circular, with a diameter of c.100m and has parallel double-ditches extending south-east from the south-east facing entrance. Its location in relatively close proximity to the site can be considered to increase the likelihood of contemporary remains surviving here.



2.55 The geophysical survey succeeded in identifying the below ground remains of the ridge and furrow earthworks and did not to highlight any significant focus of archaeological activity in the proposed development site. Whilst the results provide an indication that the development site is unlikely to contain remains of such significance as to prevent development of the site, a further stage of intrusive trial trench evaluation is still required here.

2.56 The present site does not appear to have been subject to recent development and there is therefore potential that should archaeological remains be present that they will be undisturbed and well preserved. Groundworks associated with the proposed development will have the potential to destroy or disturb important archaeological deposits and features associated with the nearby Iron Age cropmark site and the nearby settlement at Church End, Wootton which may survive here.

2.57 It is therefore recommended that should planning permission be granted an archaeological strategy should be submitted to the planning authority before development commences. This can be secured via a condition.

#### Heritage

2.58 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a statutory duty on Local Planning Authorities to have special regard to the desirability of preserving listed buildings and their settings and any features of special architectural or historic interest they may possess. BBLP Policy BE21 reflects this duty. Policy CP23 of the CSRIP requires that development must protect and, where appropriate enhance, the character of listed buildings. Paragraph 193 of the NPPF sets out that great weight should be given to the asset's conservation in a manner proportionate to the significance of the heritage asset irrespective of the level of harm to its significance.

2.59 The application has been assessed by the Council's Heritage Team and they have identified the development would result in a very low level of less than substantial harm which could be removed all together with suitable siting and screening of the development. The nearest heritage assets are being Wootton Conservation Area, St Marys Church (Grade 1 listed, Wootton House (Grade 11 listed), Wootton House Stables (Grade 11 listed) and others within the village including Ivy Cottage and its barn, 48 Church Road, The Chequers Inn and 41-45 Hall End Road. They have advised that the site makes very limited contribution to the significance of the identified heritage assets or Wootton Conservation Area given the more modern development which has taken place in between the site and those assets.

2.60 The application is therefore in accordance with Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990; policy CP23 of the Bedford Borough Core Strategy & Rural Issues Plan and saved policies BE11 and BE21 of the Bedford Borough Local Plan 2002, as well as chapter 16 of the NPPF.

## Ecology

2.61 The site falls within a designated County Wildlife Site (Wootton Woods) totalling about 13% of that total designated area. A County Wildlife Site is a non statutory designated site for nature conservation that has been recognized as important for wildlife when assessed against a set of criteria. The selection guidelines consider aspects of the site such as Size, Diversity, Rarity, Fragility, Typicality and Recorded History. It contains hedgerows, a pond and trees and is close to the mature woodland of Wootton Wood.

2.62 Recognition as a County Wildlife site does not confer protection on the site, or right of access, however for any significant change of land use such as that proposed in this application it is expected the wildlife interest will be taken into account alongside other normal planning considerations.

2.63 The NPPF paragraph 170 sets out that Planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)

2.64 CSRIP Policy CP25 sets out objectives for the biodiversity and geodiversity of the Borough to be protected and enhanced where appropriate. The development clearly has the potential to impact on the ecology and biodiversity of the site and surrounding area.

2.65 The application has been accompanied by a phase 1 Habitat Survey and Ecological Report prepared by ERAP dated April 2019. This identifies that the CWS comprises of ancient semi-natural broadleaved woodland, neutral grassland and hedgerows. Priority Habitats at the site comprise the pond (to be retained and brought into appropriate management) and the boundary hedgerows.

2.66 The Habitat Survey has confirmed the presence of Great Crested Newts in the existing pond on site (protected under European and UK law) and the presence of Badgers on the land, although no setts were identified within the site.

2.67 The development is proposing mitigation for the loss of habitat with Habitat creation /compensation benefits (hedgerow planting, pond excavation and hibernacula creation) to achieve a significant net gain in length of native hedgerow, great crested newt breeding ponds and enhanced habitat connectivity through the site; and habitat creation within the built environment to provide opportunities for fauna such as roosting bats and nesting birds, particularly Priority Species.

2.68 The Wildlife Trust has been consulted on the application and they do not object to the development. They advise (3rd June 2019) that conditions are required to ensure that there is a minimum of a 10% biodiversity net gain across the site if the development is approved. This should be done using the DEFRA biodiversity Metric.

2.69 They have commented that nearly half (47.7%) of the existing semi-improved grassland within the site is to be developed, a significant amount is proposed to be enhanced to Lowland Meadow Priority Habitat. This is not considered to be meet biodiversity gain factoring in it takes a minimum of 12 years for Lowland Meadow Priority Habitat to establish.

2.70 They therefore recommend that the measures proposed in the Ecological Appraisal are implemented and delivered through a Construction Environment Management Plan (CEMP) and a Landscape and Habitat Management and Monitoring Plan (LHMMP) with adequate funding provided in perpetuity and secured by a suitably worded planning condition. Additional measures that should be added to the management plans include:

Details of how pollution and sedimentation of the pond network will be prevented both during construction and into the future with adequate monitoring to ensure that the quality and quantity of water in the ponds is maintained. Tests should be carried out prior to and during construction to collect baseline levels, as well as, at regular intervals during operation. Incorporation of swift bricks with an average allocation of two boxes in every other dwelling or three boxes in every third dwelling. The management plans should adhere to the following conditions provided in Biodiversity –Code of Practice for Planning and Development (BS 42020:2013).

2.71 Taking into account the submitted Ecology report and the advice from the Wildlife Trust it is recognised that the site is a designated County Wildlife site which has been locally designated for its ecological benefits. Any scheme which will impact on this ecological value must therefore result in a net biodiversity benefit across the development and the site. In this case the Wildlife Trust has not objected to the development based on the highlighted improvements subject to conditions securing these benefits in to the future.

2.72 It is therefore concluded that the scheme will result in an improvement to the biodiversity value of the site and that the benefits to be achieved and secured by the scheme outweigh the estimated loss of c. 3.1 hectares of the neutral grassland at the CWS to achieve compliance with the NPPF, Policy NE3 of the Bedford Borough Local Plan and Policy CP25 of the Core Strategy and Rural Issues Plan.

2.73 Natural England have been consulted and advise they have no comments to make on the application although they highlight they have not assessed the application for impacts on protected species.

2.74 The developer will require a specific licence from Natural England to carry out works which affect the GCN habitat.

## Drainage

2.75 Policy U2 (Flood Plain) states that the Council will not permit development that compromises the capacity of the floodplain, balancing ponds, drainage pipes, channels and other flood defences. Residents and the School have raised concerns about flooding at the site and in particular surface water runoff which is reported to have caused flooding issues. The site however falls within Flood Zone 1 which is not an area identified as being at flood risk.

2.76 Whilst the details of the proposal being considered are not yet known it is proposed to incorporate a SUDS scheme which can be conditioned. The Council's Flood Investigation officer has no objection to the surface water disposal proposals in the Flood Risk Assessment subject to conditions requiring full drainage details.

2.77 Anglian Water has confirmed they have capacity for waste water and foul sewerage however they have to manage this capacity. They have highlighted that a public sewer is shown on record plans within the land identified for the proposed development which will require a 3m easement. This will need to be addressed at the reserved matters stage.

2.78 There is no reason to believe that the scheme could not meet the requirements and it will be for the future developer to demonstrate this at the reserved matters stage this.

## Sustainability/Energy

2.79 Policy CP26 Climate Change and Pollution requires amongst other things that development achieve a minimum of 10% reduction in carbon emissions. This can be secured via a condition.

## Trees Hedges and Landscaping

2.80 The site is outside the conservation area and is not subject to a Tree Preservation Order. The proposed access into the site requires the removal of a section of hedgerow, and as the land is currently agricultural, intact and the development proposes removal of around 20 metres in length it falls under the Hedgerow Regulations 1997. The applicant has identified that the hedge is a priority habitat and therefore its loss would result in harm. To mitigate this loss the development is proposing a significant increase in hedgerow planting across the site (up to 490 metres) which is considered to adequately mitigate for the section to be lost forming the junction.

2.81 The site is considered agricultural under rough grazing management, for this reason a majority of the trees are situated within the hedgerows except for a small group located in the South East corner. Therefore in the respect of 'trees' the indicative layout indicates that they are unlikely to be compromised by the development, as large buffer areas have been indicated around the periphery allowing for development to occur a significant distance outside of any Root Protection Area.

2.82 There is scope for a robust landscaping scheme for the site which will be important due to the character of the area being rural. Where trees are planted within close proximity to built structures and within areas of hard landscaping the tree pit design needs to be incorporated as part of the infrastructure planning and design stage of any new development.

2.83 Using innovative products to incorporate planting pits into the water management for a site while providing the rooting environment required needs to be demonstrated. This is to ensure sustainability and longevity for the approved landscape scheme to establish and deliver within the new development. The use of root barriers, cellular systems and alternatives to achieve this must be demonstrated.

2.84 A comprehensive pallet of trees needs to complement any development and provide structure and diversity both in height and species taking into consideration their arboricultural features and characteristics. Where fruit trees are to be included local varieties need to be included for local distinctiveness and promote local biodiversity. These details can be required as part of the reserved matters on landscaping.

2.85 The British Horse Society has commented they would not want planting to affect the width of the bridleway which can be addressed at the reserved matters stage.

#### Forest of Marston Vale

2.86 The site is located within the boundary of the Forest of Marston Vale which is one of 12 nationally recognised Community Forests. ADLP Policy AD25 states that the Council will expect proposals to address the aims of the project and seek contributions towards its implementation, including a target of 30% woodland cover for the area. Off-site planting schemes in the Forest of Marston Vale will be required through a section 106 agreement

2.87 At present the tree coverage on the site is very low being a field. There is the potential to significantly increase the tree cover within the site and any developer will need to demonstrate how policy AD25 will be met at the reserved matters stage. At this time there is sufficient land on the site to enable this to be achieved.

2.88 The Forest Officer has also commented on the impact moving residential development closer to Wootton Woods will have on wildlife particularly in relation to potential predation from cats. This is a consideration the developer will have to address as part of the biodiversity enhancements and measures proposed for the site. The illustrative layout shows a 100m separation buffer between the potential houses and the woodland which gives space for mitigation. The Council are not proposing a restriction on pet ownership for occupiers of the development and this is not considered to be a reason to refuse planning permission.

## Affordable Housing

2.95 CS RIP Policy CP8 requires 30% provision of affordable housing on sites of 15 units and over, except in exceptional circumstances. The submitted Planning Statement confirms that it is proposed to provide 30% affordable housing across the site. This will need to be secured through a s106 agreement.

## Contamination

2.89 The application has been accompanied by a desk based study which has concluded that further intrusive ground investigations will be required. The Council's Contaminated Land Officer has raised no objection to the findings of the report which recommends full intrusive investigation (and any required mitigation) is undertaken. Subject to a condition to require this investigation the proposal is considered acceptable in terms of contaminated land.

2.90 The Council's Environmental Health Team has raised no objections to the application.

## Loss of Agricultural Land

2.91 Paragraph 170 of the NPPF states that decisions should contribute to enhancing the natural environment by, amongst other things, recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital, ecosystem services including the economic and other benefits of the best and most versatile agricultural land. Paragraph 171 of the NPPF states that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of higher quality. The framework defines best and most versatile agricultural land as land in grades 1, 2 and 3a of the Agricultural Land Classification. The NPPF fails to define what significant development of agricultural land constitutes. The submitted agricultural land assessment states that the land comprises of grade 3a land. Officers consider that the proposed development constitutes a significant loss of grade 3a agricultural land. No assessment has been submitted with the application to demonstrate that the development could not be located on poorer quality land. The development would therefore be contrary to policies CP1 and CP2 which seek to ensure sustainable levels, locations and forms of development and to ensure resources are used efficiently. Subsequently, the proposal is considered to conflict with paragraph 170 of the NPPF.

## Utilities

2.92 Neighbours have objected to the proposal due to potential impact on water pressure and the local network. A Utilities report accompanies the application which has concluded that there are no issues. Connection to the sewerage network would be dealt with at the Building Regulations stage and Anglian Water has a statutory obligation to make foul connections available.

## Play and Open Space

2.93 Policy AD28 of the Bedford Borough Allocations and Designations Local Plan 2013 (ADLP) requires new housing development to provide on-site open space in accordance with the adopted standards. This will be secured as park of the reserved matters.

## Education

2.94 The site is immediately next to Wootton Upper School and opposite an allocated school expansion site. The Education Department has however confirmed that pupil yield arising from additional development within Wootton could not be supported with the current local lower school capacity.

2.95 From a pupil place planning and education perspective, it is always desirable that lower school places are provided locally. As such, Education Officers wouldn't encourage applications that result in pupils having to attend a school where there is a necessity to provide ongoing school transport provision.

2.96 It is however accepted that capacity may be available within neighbouring villages although this would require young children to travel to school, which would be inconvenient for families, create additional traffic on rural roads and have financial implications for the borough council due to the need for school transport.

2.97 The solution albeit not ideal is to seek CIL contributions towards Education infrastructure and a separate s106 contribution for transport costs. On this basis, Education would seek financial contribution for the pupil yield multiplied by the annual cost of transport for the period of years pupils would be expected to attend school outside of the village.

## CIL

2.98 The site falls within Wootton where the CIL rate is £100 per square metre (plus currently 36% indexation) for residential development and this will be payable.

## NHS Services

2.99 Bedfordshire CCG has confirmed that on applications for 50 – 150 dwellings and greater there will need to be a s106 contribution for Primary Care General Medical Services which equates to primary care GMS, Community and Mental Health contributions with the usual methodology rationale for those costs. These requests would total £1,122.50 per dwelling so for this development of 81 houses this equates to £90,922.50 to be secured via a legal agreement for health care provision.

## Other Matters

2.100 Some neighbours have objected to the development on the basis of a loss of a view. This is not a matter which can be given any weight in the planning balance.

2.101 Objections have been received on the basis that the level of development within Wootton is making existing houses difficult to sell. This is not a consideration which can be given any weight in the planning system.

2.102 Residents have raised a lack of facilities within Wootton as being a concern. This proposed development is not of a scale which would justify the requirement for the developer to provide an additional shop; however, it can aid the viability of an additional shop should one come forward as a planning application.

2.103 A neighbour has raised issues of land ownership in relation to the track and verges running between the site and Wootton Upper School. The applicant has confirmed that at this stage they are only seeking the main access to Hall End Road and not a pedestrian link shown on an indicative plan. The development will therefore not encroach on the adjoining land. Ownership of land however is a civil matter and cannot be considered as material to the planning decision.

## Planning Balance

2.104 Section 38(6) PCPA 2004 states that “if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”. The proposed development is contrary to the development plan, being major residential development, in the open countryside, within the growth area but outside of the defined limit (Settlement Policy Area) boundary. The development will also result in building on a designated County Wildlife site, loss of 20m of hedgerow and will result in the loss of 3a Agricultural land.

2.105 The NPPF (2019) is a material planning consideration and its presumption in favour of sustainable development as set out in paragraph 11 of the NPPF applies given that Bedford Borough Council currently cannot demonstrate a 5 year supply of deliverable housing sites, meaning that its housing related policies are out of date.

2.106 As set out in this report Paragraph 11(d) of the NPPF is set out in two parts. Part (i) states that permission should be granted unless the application of policies in the Framework that protect areas or assets of particular importance (set out in Footnote 6 of the NPPF) provide a clear reason for refusing the development proposed. As set out Footnote 6 does not apply to this site as it is not one of those protected sites listed. If, however, the restrictive policies do not provide a clear reason for refusing the development, then Part (ii) must be considered. Part (ii) must also be considered if none of the restrictions in Footnote 6 apply.



2.107 Part (ii) engages the 'Tilted Balance' and states that permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

2.108 Harm has been identified in terms of the loss a grade 3a agricultural land, a section of hedgerow and the loss of part of the County Wildlife Site. There would also be a notable change in character from grazing land to residential built form. Individually those harms are considered to be of a minor nature, but in sum they would amount to moderate harm. Such moderate harm, however, would not significantly and demonstrably outweigh the benefits in the form of additional market and affordable dwellings which would contribute towards remedying the 5 year land supply deficit, the associated support to the local economy, ecological enhancement to the site, public open space provision and highway improvement works to slow traffic near the school.

2.109 On balance the scales tip in favour of approval.

#### Prematurity

2.110 Paragraph 49 of the NPPF states that "in the context of the Framework – and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:

- 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 that are central to an emerging plan; and
- b) The emerging plan is at an advance stage but is not yet formally part of the development plan for the area."

2.111 Paragraph 50 of the NPPF also states that refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination; or – in the case of a neighbourhood plan – before the end of the local planning authority publicity period on the draft plan. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how granting permission for the development concerned would prejudice the outcome of the plan-making process.

2.112 The emerging local plan is at an advanced stage but nothing about this proposal is central to the emerging plan that its approval would result in the emerging plan being undermined.

2.113 It is also noted that Wootton Parish has started neighbourhood plan preparation but has yet to complete a site allocation assessment; as a result, the neighbourhood plan is not sufficiently advanced to establish whether the aspirations of the Parish are achievable or whether any sites (additional or larger sites) will be allocated through that process. As a result, it is considered that limited weight should be given to the emerging neighbourhood plan and that a reason for refusal based on prematurity would not meet the requirements of Paragraph 49 of the NPPF.

#### Pre-commencement conditions

2.114 Pursuant to the Town and Country Planning (Pre-commencement Conditions) Regulations 2018, the local planning authority must obtain the written agreement of the applicant to the terms of any pre-commencement condition recommended before it can be imposed on any planning permission granted. In this case, the applicant's agent has been requested to provide agreement to the pre-commencement conditions recommended at the end of this report and an update on any agreement will be given at the committee meeting.

### 3. CONCLUSION

In line with Section 38(6) PCPA 2004 determinations must be made in accordance with the development plan unless material considerations indicate otherwise. The subject site lies within the Growth Area but beyond the settlement boundary area for Wootton and is therefore regarded as open countryside for planning policy purposes. The Council's adopted Core Strategy aims to direct new housing to key service centres where housing, services and facilities can be provided close together. Wootton is a key service centre, however the proposal conflicts with Policies CP3 and CP13 in so far as the site is outside of the limits of the growth area. Notwithstanding, the Council cannot demonstrate a 5 year supply of deliverable housing sites and therefore those Core Strategy policies are deemed out of date.

Having applied the tilted balance assessment required by Paragraph 11(d), officers consider that as there are no notable reasons for recommending refusal, the benefits of the proposed development by virtue of the provision of the additional housing tilts the balance in favour of granting planning permission.

It is therefore recommended that outline planning permission is granted subject to a S106 agreement to secure the affordable housing, tree cover and NHS contributions and highways improvements works and subject to the conditions as set out in this report.

**RECOMMENDATION: Permit subject to a Planning Obligation subject to the following conditions:-**

01. The development hereby approved shall be carried out in accordance with the plans and documents listed on this notice, unless required otherwise by a separate planning condition of this permission.  
REASON: To provide certainty on what is being authorised by this permission.
02. Development shall not commence other than construction of the access road until details of the following matters (in respect of which approval is expressly reserved) have been submitted to and approved in writing by the Local Planning Authority: (1) Appearance (2) Landscaping (3) Layout (4) Scale (5) Access (internal road and footpath details). The development shall be carried out in strict accordance with the approved details.  
REASON: In accordance with Section 92 of the Town and Country Planning Act
03. Application for approval of the reserved matters shall be made to the Local Planning Authority in writing before the expiration of 3 years from the date of this permission.  
REASON: In accordance with Section 92 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning Compulsory Purchase Act 2004, to prevent the accumulation of unimplemented planning permissions.
04. The development hereby permitted shall be begun before the expiration of 2 years from the date of the last of the reserved matters to be approved.  
REASON: In accordance with Section 92 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning Compulsory Purchase Act 2004.
05. The submission of reserved matters for layout shall include details for triangular pedestrian visibility at all vehicular accesses within the site that cross a footway. The splays on both sides of each access shall measure 1.8 metres x 1.8 metres within the land being accessed adjacent to the rear edge of the footway. The splays shall be provided before the access to which the splays relate is first brought into use. All parts of the splays shall thereafter be kept free of all obstructions over a height of 0.6 metres above ground level.  
REASON: In the interests of highway and pedestrian safety and in accordance with saved policy BE30 iv), v) and vi) of the adopted Bedford Borough Local Plan 2002.
06. Notwithstanding the details shown on plan no. 533.0001.002revC, beyond the first 15m of the access road details the submission of reserved matters for layout shall include details of the site's internal roads, footways/paths and cycleways. No building shall be occupied until the roads, footways/paths and cycleways which provide access to it from the existing highway have been laid out and constructed in accordance with the approved plans.  
REASON: In order to minimise danger, obstruction and inconvenience to users of the highway and of the proposed estate road in accordance with saved policy BE30, iv), v) and vi) of the adopted Bedford Borough Local Plan 2002.
07. The submission of reserved matters for layout shall include details of bin storage/collection point(s) in accordance with Bedford Borough Council guidance 'Waste & Recycling Operational Policies' or any superseding guidance. Storage and collection of bins shall be provided in accordance with the approved scheme and thereafter retained.  
REASON: In the interest of amenity and in accordance with saved policy BE30 vi) of the adopted Bedford Borough Local Plan 2002 and Bedford Borough Council guidance 'Waste & Recycling Operational Policies'.

08. The submission of reserved matters for layout, appearance and scale shall include plan details with dimensions, materials, finishes and colours of all boundary treatments, screen walls and fences to the perimeter and individual plot gardens, including a timetable for carrying out the works. The works shall be carried out in accordance with the approved details and timetable.  
REASON: To ensure a satisfactory standard of development and in accordance with saved Policy BE30 of the Bedford Borough Local Plan 2002 and Policy CP21 of the Core Strategy and Rural issues Plan 2008.
09. Details submitted in respect of the reserved matters for layout shall make provision for 10% of the total number of dwellings to be built in accordance with the Mobility Standards set out in the document produced by Bedford Borough Council entitled 'Mobility Housing' (2000) or such replacement document or policy which exists at the time of the development commencing. The submitted details shall specifically indicate which dwellings are to be built to these standards and the relevant dwellings shall be built and retained in accordance with the approved details.  
REASON: To improve the accessibility of housing to the whole community and particularly disabled people and in accordance with 'saved' Policies BE30 and BE48 of the Bedford Borough Local Plan 2002 and CP21 of the Core Strategy and Rural Issues Plan 2008.
10. No development shall take place until a scheme for car and cycle parking with access thereto in accordance with Bedford Borough Council's Parking Standards for Sustainable Communities: Design and Good Practice 2014 has been submitted and approved in writing by the Local Planning Authority. The approved scheme shall be implemented and made available for use before the development is occupied and the car and cycle parking areas shall not thereafter be used for any other purpose.  
REASON: To ensure a satisfactory standard of development in accordance with saved policy BE30 iv), v) and vi) of the adopted Bedford Borough Local Plan 2002 and policy CP2 vii of the Core Strategy and Rural Issues Plan 2008.
11. No development shall take place until an archaeological strategy for evaluation and if necessary, a further mitigation strategy based on the outcome of the evaluation, has been submitted to and approved in writing by the Local Planning Authority. The archaeological mitigation strategy shall include a timetable and the following components (the completion of each to the satisfaction of the Local Planning Authority will result in a separate confirmation of compliance for each component):-  
(i) fieldwork and/ or preservation "in situ" of archaeological remains;  
(ii) a post-excavation assessment report (to be submitted within six months of the completion of fieldwork);  
(iii) a post-excavation analysis report, preparation of site archive ready for deposition at a store approved by the Local Planning Authority, completion of an archive report, and submission of a publication report (to be completed within two years of the completion of fieldwork). The archaeological mitigation strategy shall be carried out in accordance with the approved details and timings.  
REASON: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely preservation and/or investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Saved Policies BE24 & BE25 of the Bedford Borough Local Plan 2002, Policy CP23 of the Bedford Borough Core Strategy and Rural Issues Plan (2008) and according to national policies contained in the National Planning Policy Framework (MHCLG,2019). The Local Planning Authority is satisfied that the timing of compliance is fundamental to the development permitted and that the permission ought to be refused unless the condition is imposed in this form.

12. No development shall take place, including any works of demolition, until a Construction Management Plan, associated with the development of the site, has been submitted and approved in writing by the Local Planning Authority which shall include information on:
- (A) The parking of vehicles
  - (B) Loading and unloading of plant and materials used in the development
  - (C) Storage of plant and materials used in the development
  - (D) The erection and maintenance of security hoarding / scaffolding affecting the highway if required.
  - (E) Measures on site to control the deposition of dirt / mud on surrounding roads during the development.
  - (F) Footpath/footway/cycleway or road closures needed during the development period (to include all proposals for road closures or traffic diversions prior to the adoption of roads within the development)
  - (G) Traffic management needed at the interface with the public highway during the development period
  - (H) Times, routes (to include specific measures such as delivery ticket instructions and location of signage) and means of access and egress for construction traffic and delivery vehicles (including the import of materials and the removal of waste from the site)
- The approved Construction Management Plan associated with the development of the site shall be adhered to throughout the development process.
- REASON: In the interests of safety, protecting the amenity of local land uses, neighbouring residents and highway safety and in accordance with saved policy BE30 iv) and vi) of the adopted Bedford Borough Local Plan 2002. The Local Planning Authority is satisfied that the timing of compliance is fundamental to the development permitted and that the permission ought to be refused unless the condition is imposed in this form.
13. No development shall take place until a surface water drainage scheme for the site which accords with the Council's adopted Sustainable Drainage Systems (SuDS) SPD 2018, has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be subsequently implemented in accordance with the approved details before the development is occupied.
- REASON: To prevent the increased risk of flooding by the development proposals and to ensure the satisfactory drainage of the site and in accordance with saved Policies BE30, NE16 and U2 of the Bedford Borough Local Plan 2002, Policy CP26 (criterion viii) of the Core Strategy and Rural Issues Plan 2008 and the Council's Sustainable Drainage System (SuDS) SPD 2018. The Local Planning Authority is satisfied that the timing of compliance is fundamental to the development permitted and that the permission ought to be refused unless the condition is imposed in this form.
14. No development shall take place until details of the proposed arrangements for future management and maintenance of the proposed streets & paths within the development have been submitted to and approved by the local planning authority. The streets and paths shall thereafter be maintained in accordance with the approved management and maintenance details until such time as an agreement has been entered into under Section 38 of the Highways Act 1980 or a private management and maintenance company has been established.

REASON: To ensure that the estate streets serving the development are completed and maintained to the approved standard, and are available for use by the occupants, and other users of the development, in the interest of highway safety; to ensure a satisfactory appearance to the highways infrastructure serving the approved development; and to safeguard the visual amenities of the locality and users of the highway, in accordance with Policy BE30 of the Bedford Borough. The Local Planning Authority is satisfied that the timing of compliance is fundamental to the development permitted and that permission ought to be refused unless the condition is imposed in this form.

15. No development shall take place until detailed drawings showing the pre development ground levels and the proposed ground levels have been submitted to and approved in writing by the Local Planning Authority unless the existing and proposed levels details are submitted and approved as part of any reserved matters application. The development shall be implemented in accordance with the approved details or particulars.

REASON: To ensure that the effects of the proposal in relation to existing and proposed levels are fully assessed and in accordance with Policy BE30 of the Bedford Borough Local Plan 2002. The Local Planning Authority is satisfied that the timing of compliance is fundamental to the development permitted and that the permission ought to be refused unless the condition is imposed in this form.

16. No development shall take place until a scheme for the enhancement of the site for biodiversity purposes, in accordance with the submitted Ecology Report authored by ERAP Consultant Ecologists dated April 2019 has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include timescales for implementation and future management, and shall be implemented in accordance with the approved details and thereafter so retained.

REASON: To identify and ensure the survival and protection of important species and those protected by legislation that could be adversely affected by the development, having regard to Policy CP25 of the Core Strategy and Rural Issues Plan (2008). The Local Planning Authority is satisfied that the timing of compliance is fundamental to the development permitted and that the permission ought to be refused unless the condition is imposed in this form.

17. No development shall take place until an energy audit (including timetable) has been submitted to and approved in writing by the Local Planning Authority. The energy audit shall demonstrate how the development will achieve a 19% improvement in the Dwelling Emission Rate over the Target Emission Rate as defined in The Building Regulations Approved Document L1A: Conservation of Fuel and Power in New Dwellings (2013) and shall include:

- An assessment of the predicted carbon dioxide emissions of the development once occupied.
- A review of alternative methods for reducing the predicted carbon emissions of the development once occupied and their anticipated effectiveness.
- Proposals for measuring the effectiveness of the chosen methods for reducing the predicted carbon dioxide emissions of the development once occupied.
- Consideration of how the layout, orientation, design and materials used in the development can affect the consumption and use of energy.

The development shall be carried out in accordance with the approved energy audit.

REASON: To ensure an energy efficient and sustainable development in accordance with Policies CP21 (and CP26) of the Core Strategy and Rural Issues Plan 2008, Policy AD2 of the Allocations and Designations Plan 2013, saved Policy BE8 of the Bedford Borough Local Plan 2002 and the Policy Statement Update - Housing Standards 2015. The Local Planning Authority is satisfied that the timing of compliance is fundamental to the development permitted and that the permission ought to be refused unless the condition is imposed in this form.

18. No development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following.
- a) Risk assessment of potentially damaging construction activities.
  - b) Identification of "biodiversity protection zones".
  - c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
  - d) The location and timing of sensitive works to avoid harm to biodiversity features.
  - e) The times during construction when specialist ecologists need to be present on site to oversee works.
  - f) Responsible persons and lines of communication.
  - g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
  - h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

REASON: In the interests of safety, protecting the amenity of local land uses, neighbouring residents and highway safety and in accordance with saved policy BE30 iv) and vi) of the adopted Bedford Borough Local Plan 2002. The Local Planning Authority is satisfied that the timing of compliance is fundamental to the development permitted and that the permission ought to be refused unless the condition is imposed in this form.

19. No development shall take place, including demolition, ground works and vegetation clearance, until a biodiversity monitoring strategy has been submitted to, and approved in writing by, the local planning authority. The purpose of the strategy shall be to establish the effectiveness of protection, mitigation and compensation measures for biodiversity and inform contingency and/or remedial measures if necessary. The content of the Strategy shall include the following.
- a) Aims and objectives of monitoring to match the stated purpose.
  - b) Identification of adequate baseline conditions prior to the start of development.
  - c) Appropriate success criteria, thresholds, triggers and targets against which the effectiveness of the various conservation measures being monitored can be judged.
  - d) Methods for data gathering and analysis.
  - e) Location of monitoring.
  - f) Timing and duration of monitoring.
  - g) Responsible persons and lines of communication.
  - h) Review, and where appropriate, publication of results and outcomes.

A report describing the results of monitoring shall be submitted to the local planning authority at intervals identified in the strategy. The report shall also set out (where the results from monitoring show that conservation aims and objectives are not being met) how contingencies and/or remedial action will be identified, agreed with the local planning authority, and then implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.

The monitoring strategy will be implemented in accordance with the approved details.

REASON: To identify and ensure the survival and protection of important species and those protected by legislation that could be adversely affected by the development, having regard to Policy CP25 of the Core Strategy and Rural Issues Plan (2008). The Local Planning Authority is satisfied that the timing of compliance is fundamental to the development permitted and that the permission ought to be refused unless the condition is imposed in this form.

20. No development shall take place until an ecological design strategy (EDS) addressing mitigation, compensation, enhancement and creation works for biodiversity has been submitted to and approved in writing by the local planning authority.

The EDS shall include the following.

- a) Purpose and conservation objectives for the proposed works.
- b) Review of site potential and constraints
- c) Detailed design(s) and/or working method(s) to achieve stated objectives.
- d) Extent and location/area of proposed works on appropriate scale maps and plans.
- e) Type and source of materials to be used where appropriate, e.g. native species of local provenance.
- f) Timetable for implementation demonstrating that works are aligned with the proposed phasing of development.
- g) Persons responsible for implementing the works.
- h) Details of initial aftercare and long-term maintenance.
- i) Details for monitoring and remedial measures.
- j) Details for disposal of any wastes arising from works.

The EDS shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter.

REASON: To identify and ensure the survival and protection of important species and those protected by legislation that could be adversely affected by the development, having regard to Policy CP25 of the Core Strategy and Rural Issues Plan (2008). The Local Planning Authority is satisfied that the timing of compliance is fundamental to the development permitted and that the permission ought to be refused unless the condition is imposed in this form.

21. No development shall take place until a contaminated land assessment and, if necessary, associated remedial strategy, together with a timetable of works, has been submitted to the Local Planning Authority for approval. The assessment shall comprise the following:

- a) The Contaminated Land Assessment shall include a desk study and site reconnaissance exercise to produce a conceptual model of the site. This shall be used to propose a site investigation strategy, which shall be approved by the Local Planning Authority prior to the investigations commencing on the site.



- b) The site investigation shall include relevant soil, soil gas, surface and groundwater sampling, in accordance with the quality assured sampling and analysis methodology of the Contaminated Land Reports as well as other appropriate guidance where necessary. This shall include risk assessment based on the Contaminated Land Exposure Assessment Model or where appropriate other guidance providing adequate justification can be provided for such use.
- c) The site investigation report shall detail all investigative works and sampling on site, together with the results of analysis, risk assessment to any receptors and a proposed remedial strategy. The Local planning Authority shall approve this remedial strategy as proposed prior to any redemption commencing on site. The work shall be of such a nature so as to render harmless the identified contamination, given the proposed end use of the site and surrounding environment including any controlled waters. Any laboratories used for sampling shall be compliant with United Kingdom Accreditation Service or an equivalent approved accredited quality control scheme.
- d) The remediation work as outlined in the approved strategy shall be carried out in full on site under a quality assurance scheme to demonstrate compliance with the proposed methodology and best practice guidance. If during any works, contamination is encountered which has not previously been identified, including new hotspots uncovered by demolition; then the additional contamination shall be fully assessed and an appropriate remediation scheme submitted to the Local Planning Authority for approval. All works will be made available for witnessing by an appropriate Council Officer.

Upon completion of works, this Condition shall not be discharged until a validation report has been submitted to and approved in writing by the Local Planning Authority. The validation report shall include details of the proposed remediation works and the quality assurance certificates to show that the works have been carried out in full accordance with the approved methodology. Details of any post remediation sampling to show the site has reached the required clean-up criteria shall be included in the closure report together with the necessary documentation detailing what waste materials have been removed from the site. No part of the development shall be occupied until such works have been completed.

REASON: In order to control pollution of land and water in the interests of both the environment and public safety. To ensure the effective investigation and remediation of the contaminated land sites and in accordance with saved Policy BE30 of the Bedford Borough Local Plan 2002 and Policy CP21 of the Core Strategy and Rural issues Plan 2008.

22. There shall be no development above slab level until details of the provision of a raised table at the proposed site junction with Hall End Road incorporating informal/uncontrolled pedestrian crossing facility with dropped kerbs and tactile paving and a line of bollards along the highway verge between Wootton Upper School's two vehicle accesses have been submitted to and approved in writing. The development shall not be occupied until the raised junction table and crossing facilities provided have been completed in accordance with the approved plans.

REASON: In the interests of highway safety and for the convenience of pedestrians in accordance with saved policy BE30 iv) and vi) of the adopted Bedford Borough Local Plan 2002.

23. Visibility splays shall be provided at the junction of all proposed access points with the public highway prior to the use of the relevant access point(s). The splay lines shall be not less than 4.5m for HGV access points and 2.4m for car access points measured along the centre line of the proposed access from its junction with the channel of the carriageway and not less than 43m measured from the centre line of the proposed access along the line of the nearside channel of the carriageway. All parts of the splays shall thereafter be kept free of all obstructions above the adjacent carriageway level.  
REASON: In the interests of highway and pedestrian safety and in accordance with saved policy BE30 iv), v) and vi) of the Bedford Borough Local Plan 2002. The Local Planning Authority is satisfied that the timing of compliance is fundamental to the development permitted and that the permission ought to be refused unless the condition is imposed in this form
24. No development shall take place until a scheme for on-site foul water drainage works, including connection point and discharge rate, has been submitted to and approved in writing by the Local Planning Authority. Prior to the occupation of any phase, the foul water drainage works relating to that phase must have been carried out in complete accordance with the approved scheme.  
REASON: To prevent the increased risk of flooding by the development proposals and to ensure the satisfactory drainage of the site and in accordance with saved Policies BE30, NE16 and U2 of the Bedford Borough Local Plan 2002, Policy CP26 (criterion viii) of the Core Strategy and Rural Issues Plan 2008 and the Council's Sustainable Drainage System (SuDS) SPD 2018. The Local Planning Authority is satisfied that the timing of compliance is fundamental to the development permitted and that the permission ought to be refused unless the condition is imposed in this form.
25. Prior to the construction above damp proof course , a scheme for on-site foul water drainage works, including connection point and discharge rate, shall be submitted to and approved in writing by the Local Planning Authority. Prior to the occupation of any phase, the foul water drainage works relating to that phase must have been carried out in complete accordance with the approved scheme.  
REASON: To prevent the increased risk of flooding by the development proposals and to ensure the satisfactory drainage of the site and in accordance with saved Policies BE30, NE16 and U2 of the Bedford Borough Local Plan 2002, Policy CP26 (criterion viii) of the Core Strategy and Rural Issues Plan 2008 and the Council's Sustainable Drainage System (SuDS) SPD 2018. The Local Planning Authority is satisfied that the timing of compliance is fundamental to the development permitted and that the permission ought to be refused unless the condition is imposed in this form.
26. Prior to the occupation of any dwelling served by the roads hereby permitted a scheme of measures to provide for: (1) the provision of restrictions on service margin and footway parking within the site (2) restriction on parking on the carriageway within the site and on both sides of Hall End Road from the end of the parking restrictions to the south-east of the proposed access to a point 25m north of the junction of Public Footpath 11 and Hall End Road (3) the limitation of vehicle speeds to 20mph (including additional physical measures) and (4) a delivery strategy including timetable of implementation, shall be submitted to and approved in writing by the Local Planning Authority. The provisions of the scheme thereby approved shall be complied with in full.  
REASON: In the interests of the avoidance of congestion and of highway safety and in accordance with Policy BE30 of the Bedford Borough Local Plan.
27. No building shall be occupied until an energy statement has been submitted to and approved in writing by the Local Planning Authority. The energy statement shall include:

- An assessment of the actual effect on carbon dioxide emissions demonstrating the measures previously agreed as part of the energy audit have achieved a reduction of at least 10% in carbon emissions below the normal requirement set by the Building Regulations.

- A statement of how the layout, orientation, design and materials used in the development have actually been influenced by the energy audit.

REASON: To ensure an energy efficient and sustainable development in accordance with Policies CP21 (and CP26) of the Core Strategy and Rural Issues Plan 2008, Policy AD2 of the Allocations and Designations Plan 2013, saved Policy BE8 of the Bedford Borough Local Plan 2002 and the Policy Statement Update - Housing Standards 2015.

28. The development shall not be occupied until a detailed travel plan has been submitted to and approved in writing by the local planning authority. The travel plan shall include:

\* A baseline survey of site occupants (if known) or a timetable to undertake a baseline survey of occupants (within 6 months of first occupation) to establish current/proposed travel patterns;

\* Details of existing and proposed transport provision and facilities, to include links to pedestrian, cycle and public transport networks and conformity with the local planning authority's car and cycle parking standards;

\* Proposals and measures to minimise private car use and facilitate walking, cycling and use of public transport;

\* A detailed set of Travel Plan targets with relevant target dates;

\* A detailed 'Action Plan' to include specific timetabled measures designed to promote travel choice;

\* Proposed plans/methods to monitor and undertake annual reviews of the Travel Plan and its targets for a period of 5 years. After each of the five annual reviews, local planning authority for information;

\* Details of site specific marketing and publicity information to be provided to all occupiers of the development, to include:

o Site specific travel and transport information;

o Incentives to encourage sustainable modes of travel (e.g. travel vouchers);

o Details of relevant pedestrian, cycle and public transport routes to/ from and within the site;

o Maps showing the location of shops and other facilities; and

o Copies of relevant bus and rail timetables; and

\* The appointment of a travel plan co-ordinator who will be responsible for the preparation and submission of the Action Plan and of the 5 annual reviews thereof.

The Travel Plan shall be carried out in accordance with the timetable contained therein and shall continue in force for as long as any part of the development is occupied.

REASON: To promote sustainable modes of travel and to reduce the potential traffic impact of the development on the local highway network in accordance with saved policy BE30 iv), v) and vi) of the adopted Bedford Borough Local Plan 2002 and DfT's 'Good Practice Guidelines: Delivering travel plans through the planning system'.

29. The gradient of the vehicular access within the site and across the highway shall not be steeper than 1 in 50 for the first 15m.

REASON: In the interests of the safety of persons using the access and users of the highway in accordance with saved policy BE30 iv), v) and vi) of the adopted Bedford Borough Local Plan 2002.

30. No external lighting shall be installed on the site except in accordance with an external lighting scheme submitted to and approved in writing by the Local Planning Authority. The scheme shall include the type, quantity, height and location of lighting (to include contour plans and technical specifications as appropriate) and identify those areas / features on site that are particularly sensitive for bats roosting, resting and foraging. The lighting installations shall be designed to minimise light spillage beyond the boundaries of the site. REASON: To prevent light pollution in accordance with Policy CP21 of the Core Strategy and Rural Issues Plan 2008 and saved Policy BE42 of the Bedford Borough Local Plan 2002.
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EP4

[REDACTED]

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**From:** planning for the future <planning.forthefuture@bedford.gov.uk>  
**Sent:** 11 August 2021 16:20  
**To:** [REDACTED]  
**Subject:** RE: [External] Call for Sites - Site Assessment Form - Site 371 PFS sep site proformas document attach to site 371

Bedford BC - OFFICIAL-Unsecure

Dear [REDACTED]

I write to confirm your comments have been noted and the document attached to your email has been attached to Site #371.

Regards

[REDACTED]

[REDACTED]

**Planning Policy Team**  
**Bedford Borough Council**

✉ 4th Floor, Borough Hall, Cauldwell Street, Bedford, MK42 9AP

📞 [REDACTED]

🌐 [www.bedford.gov.uk](http://www.bedford.gov.uk)

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**From:** [REDACTED]  
**Sent:** 02 August 2021 10:35  
**To:** planning for the future <planning.forthefuture@bedford.gov.uk>  
**Subject:** [External] Call for Sites - Site Assessment Form - Site 371 PFS sep site proformas document attach to site 371

**Attention: This email originated from outside of Bedford Borough Council. Please be extra vigilant when opening attachments or clicking links.**

Dear Planning Policy Team,

I am writing in regards to the Site Assessment undertaken for Site 371 – ‘Land adjacent to Wootton Upper School, Hall End Road, Wootton’.

There are various questions answered by the planning department that have not taken account of your officers' and statutory consultees' detailed comments on a recent planning application on the site. I attach the Officer's Planning Committee Report which was published for a Planning Committee on 25<sup>th</sup> November 2019. This sets out many of the answers to the questions in Call for Sites site assessment section and the Council should take account of it in its site assessment work to ensure consistency in decision making.

In summary, the following points should be considered for each of the site assessment questions:

**2a** – the report confirms that *"the site falls within a designated County Wildlife Site totalling about 13% of that total designated area...Recognition as a County Wildlife site does not confer protection on the site...The Wildlife Trust has been consulted on the application and they do not object to the development...It is therefore concluded that the scheme will result in an improvement to the biodiversity value of the site and that the benefits to be achieved and secured by the scheme outweigh the estimated loss of c.3.1 hectares of the neutral grassland at the CWS to achieve compliance with the NPPF"*

**2b** – the report summarises that *"The Habitat Survey has confirmed the presence of Great Crested Newts in the existing pond on site...and the presence of Badgers on the land, although no setts were identified...The Wildlife Trust has been consulted on the application and they do not object to the development"*. A significant buffer is achievable to protect the existing pond.

**2c** – the report confirms that *"It is therefore concluded that the scheme will result in an improvement to the biodiversity value of the site and that the benefits to be achieved and secured by the scheme outweigh the estimated loss of c.3.1 hectares of the neutral grassland at the CWS to achieve compliance with the NPPF"*

**2d** – The report states: *"The Masterplan demonstrates how a new landscaped footpath fringes the development site and connects the new homes with built form to the edge of settlement. The proposed development will not obstruct the existing PRow within the northern and western site boundaries; this bridleway will be managed to ensure it remains suitable for use, with users encouraged to respect the areas of protected Meadow land"*. The site also borders a cycle route and can link into a green infrastructure opportunity network.

**4a** – The report states: *"The application has been assessed by the Council's Heritage Team and they have identified the development would result in a very low level of less than substantial harm which could be removed altogether with suitable siting and screening of the development. ... They have advised that the site makes very limited contribution to the significance of the identified heritage assets..."*

**5a** – The report confirms the site would provide *"associated support to the local economy"*

**9b** – The report confirms that the loss of Grade 3a agricultural land on the site would be *"of a minor nature"*.

15f – The site assessment references application 19/00894/MAO which confirms the Highway Authority consider 81 dwellings to be acceptable. No issues have been substantiated on highway or junction capacity.

**Contaminated Land** – The report confirms *"The Council's Contaminated Land Officer has raised no objections to the findings of the [desk based study] which recommends full intrusive investigation (and any required mitigation) is undertaken. Subject to a condition to require this investigation the proposal is considered acceptable in terms of contaminated land"*.

**Environmental Health** – The report confirms *"The Council's Environmental Health Team has raised no objections to the application"*.

Please may I request acknowledgement of my email and confirmation that this will be taken into account in updating the current site assessment work and future assessment.

Kind regards,

[REDACTED]

[REDACTED] [REDACTED]

Land & Planning Director



On behalf of Hollins Strategic Land

Suite 4, 1 King Street, Manchester, M2 6AW | [www.hsland.co.uk](http://www.hsland.co.uk) | [REDACTED]

T: 0161 300 6509 | [REDACTED] | [REDACTED]



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EP5

## Hollins Strategic Land – Delivery Track Record

### August 2021

The table below provides examples of HSL sites with outline consent which are completed, under construction or at reserved matters stage. It takes on average around 12 months to submit a reserved matters (RM) application from outline consent, but in some instances only 2 or 5 months. On average, more recently, building is starting within 2 years from outline consent.

SITE	HOUSEBUILDER	STATUS	OUTLINE CONSENT	RM APP SUBMITTED	BUILD START
Staveley, Derbyshire (400 dwellings)	Barratt	RM pending	28/08/20	JUL '21	JAN '22
Wingates Lane, Westhoughton, Lancashire (58 dwellings)	Hollins Homes	Under construction	30/10/18	05/08/19	APR '20
Patterdown, Chippenham, Wiltshire (72 dwellings)	Wainhomes	Under construction	09/03/18	03/01/19	AUG '20
New Road, Mistley, Essex (67 dwellings)	CALA Homes	Under construction	12/04/19	24/01/20	AUG '20
Bank Hall Farm, Broughton, Lancashire (97 dwellings)	Watkin Jones	Under construction	03/04/18	12/08/19	JAN '20
Woodlands Close, Newton-with-Scales, Lancashire (50 dwellings)	Hollins Homes	Under construction	18/08/17	13/12/17	JUN '19
Dowbridge, Kirkham, Lancashire (170 dwellings)	Story Homes	Under construction	23/01/17	6/3/19	JULY '19
Oxford Road, Calne, Wiltshire (83 units)	David Wilson Homes	Completed	04/7/16	8/7/17	JUNE '18
Hill Lane, Blackrod, Bolton (110 units)	Rowland Homes	Completed	26/4/16	19/12/16	NOV '17
The Street, Bramley, Hampshire (65 units)	Taylor Wimpey	Completed	25/5/16	05/02/18	SEP '18
Southwell Road, Farnsfield, Nottinghamshire (48 units)	Bellway	Completed	12/4/16	24/2/17	DEC '17
Hoyles Lane, Preston (48 units)	Jones Homes	Completed	02/10/15	03/01/17	OCT '17
Chester Road, Whitchurch, Shropshire (57 units)	Hollins Homes	Completed	17/12/14	10/12/15	APR '18
Kepple Lane, Garstang (130 units)	Barratt	Completed	11/12/14	11/08/15	DEC '16
Hathern Road, Shepshed, Leicestershire (270 units)	Persimmon	Completed	07/11/14	12/04/17	OCT '17
Cookes Lane, Northwich (74 units)	Stewart Milne	Completed	23/10/13	03/11/14	NOV '17
Forest Grove, Barton, Preston (65 units)	Rowland Homes	Completed	13/7/13	05/12/13	OCT '14
North of Eastway, Preston (140 units)	Barratt	Completed	13/03/14	10/06/16	JUL '17
Eastway, Fulwood, Preston (22 units)	Hollins Homes	Completed	5/12/13	29/10/14	JAN '16
Lightfoot Lane, Preston (70 units)	Persimmon (Charles Church)	Completed	27/10/11	06/07/12	APR '14
Crewe Road, Alsager, Cheshire (65 units)	Miller Homes	Completed	18/01/13	28/3/13	MAY '15
Wheelock, Sandbach (41 units)	Taylor Wimpey	Completed	-	-	-
Hesketh Bank, Lancashire (35 units)	Rowland Homes	Completed	-	-	-
Grove Farm, Chorley (75 units)	Bellway	Completed	-	-	-

In addition, HSL can contractually or legally oblige housebuilders to submit RM much quicker than would normally be the case if the housebuilder gained the outline consent themselves. This can be for several

reasons: open marketing is a much more competitive process and performance is key as well as landowners seeking a return sooner.

It is in HSL's interest to have reserved matters submitted as quickly as possible, either ourselves through our sister company Hollins Homes or by contractual arrangement with a chosen housebuilder. HSL will also oversee and input our expertise into any RM application so the process is smoother and faster.