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Our Reference: P911d

29<sup>th</sup> July 2022

Dear Sir/Madam,

**RE: Land between 34 and 36 High Street, Riseley**

### **Introduction**

On behalf of J.C Gill Development Ltd, I am pleased to formally submit representations to the Bedford Borough Local Plan 2040 Regulation 19 (Pre-submission) consultation together with the Response Form accompanying this letter.

We object to the spatial strategy set out in the draft Local Plan as matter of principle because it does not propose to allocate the most suitable site's in the most suitable locations. The approach taken by the Council is flawed, not only because it fails to recognise the more sustainable locations for growth, but also because it overly relies upon the delivery of site's that are in less sustainable locations and rely on the delivery of substantial infrastructure projects that are uncertain and likely to cause delay. The full details of the objections are presented in this representation.

In order to assist the Council in preparing a sound and credible plan we advocate those additional site's are allocated in locations that are sustainable, meet the vision and objectives set out in the plan and present a significantly more deliverable and robust housing allocation.

### **Summary of Representations**

#### **Visions and Objectives**

We support the broad intentions set out in the 'Vision and Objectives' in so far as they seek to deliver a greener, more sustainable and more attractive place to live, but there are overly optimistic statements about infrastructure delivery. Furthermore, the vision for new settlements is flawed and there is no recognition of the importance growth located on the edge of the most sustainable locations, the urban area and larger existing sustainable settlements.

#### **Spatial Strategy (DS2(S))**

The reliance on brownfield site's as housing allocations is a flawed approach as it overlooks the role that brownfield site's have as windfall opportunities. Their inclusion on a brownfield register, also negates the need to allocate as they are by definition acceptable for redevelopment. They should not be included in the plan to deliver new development.

The Plan relies too heavily on new settlements. They are not the most sustainable locations, take a very long time to emerge from conception to implementation and rely on significant new infrastructure. The Plan promotes new infrastructure opportunities but until these are in place there should be no reliance on their delivery because they are largely influenced by control outside of the Council.

The Plan fails to recognise the importance of small and medium sized site's, which is specifically supported by the NPPF. Moreover, there are many site's that are located on the edge of the contiguous edge of the Urban Area, or on the edge of existing sustainable communities in the rural area. These site's are more sustainable and more deliverable than the proposed new settlements and offer a better solution to deliver essential new homes into the borough.

Neighbourhood plans expire in 2030 and yet this plan is until 2040. There is a 10 year gap, at the very least where no development is proposed for much of the rural area, amounting to an embargo on development. This will have an impact on those communities as their need for homes increases whilst supply is not provided.

### **Amount and timing of Housing Growth (DS3(S))**

The flawed approach to the identification of suitable site's leads to a policy that delivers almost the entire requirement of this plan into the last ten years at an annual rate which is unrealistic. The rate for the last ten years is almost double that of the first five years, on an annual delivery basis.

The most recent evidence (Housing delivery test 2021) in Bedford suggests the highest rate historically is 1371 dwellings per annum. If 1,400 is achieved every year for 10 years this leaves a deficit of 3,000 dwellings that cannot be made up from any other sources of site's. All the brownfield site's will have been built out and there is an embargo in the rural areas in that 10 year period.

Given the lack site's from which dwellings are being delivered, this places huge pressure on the timing of infrastructure and the delivery of each of the allocated site's.

There is no flexibility on the policy to deal with any delays. Not only is this indicative of the problem of selecting site's that have a longer than average lead-in time, it places pressure on the plan to succeed immediately given the lead-in time for the large site's that must deliver their first units in 2030, only 7 years after the likely adoption of this plan.

The plan does not take into account the significant delays that exist in preparing infrastructure for development and the process of getting new settlements into a position when they can maximize their output.

The Wixams case study is a case that the Council need to analyse and reflect upon. The plan system is based on a manage and monitor protocol and therefore reflecting on the past is an important approach.

In short, the Wixams project took from 1997, when it was first adopted to 2006 to achieve a planning permission. The first completion was in 2009, meaning that it took 12 years from adoption to the first completion. The new settlements in this plan, if adopted in 2023, would not see a completion until 2035.

The Wixams was built out by multiple developers and yet the initial phases of development have failed to deliver the number of dwellings anticipated. As of 2016 of the original first phase of 2,250 homes only 1,259 had been completed, the equivalent to 178 dwellings per annum over 7 years.

Based on the Wixams example the likelihood of an undersupply of homes across two new settlements is seriously likely to occur as it did with Wixams.

### **Distribution of Growth (DS5(S))**

The approach to rely on new settlements to deliver homes in the latter part of the plan is flawed as has been addressed, as it holds back 88% of the new allocations for the second half of the plan placing incredible burden on the first 10 years to deliver no less than might be needed.

Whilst it is noted that the distribution of growth identifies an excess of 1,274 dwellings above the requirement this does not go far enough to counter the very likely under supply from the new settlement strategy.

The distribution of growth policy reinforces the absence of any site's proposed on the edge of sustainable settlements. It also relies on the allocation of brownfield site's, some of which will be identified on the brownfield register. As indicated by the NPPF (para 23) these site's should not be allocated in the plan where they are identified in the register. Potentially this allows a redistribution of up to 1,200 units to the rural areas or the edge of the Urban Area to deliver vital homes in the first ten years of this plan.

### **The Proposed Allocation**

#### Site Details

The site is located between no.34 and no.36 High Street, Riseley. It has not previously been promoted for inclusion in the Local Plan, however, following assessment of the draft document it is considered it could prove valuable in quickly delivering short term housing need. The site, approximately 0.65ha, is located in the southern area of Riseley, a Group 3 village. Access is available directly from High Street on the northern corner of the site. The satellite location plan of the site is shown in figure 1 below and the site identification plan is available in appendix 1.



*Figure 1. Site Location (Source: Google Earth)*

The site comprises of an open field, lined by trees and hedgerows on three boundaries and post and rail fencing on the south eastern boundary. It adjoins existing residential development on its north eastern and south western edges and a Police Station and further residential development to the north west beyond High Street. Land to the south east, beyond post and rail fencing, comprises open countryside. This site slopes from the highest point on the south east down to the High Street.

The site is located within Flood Zone 1, with areas of Flood Zone 2 abutting the north western edge as a result of Riseley Brook. It is located outside of the settlement policy area, has been identified as a key view and forms part of the Riseley Conservation Area as outlined in the Local Plan 2030 Policy Map shown in figure 2.

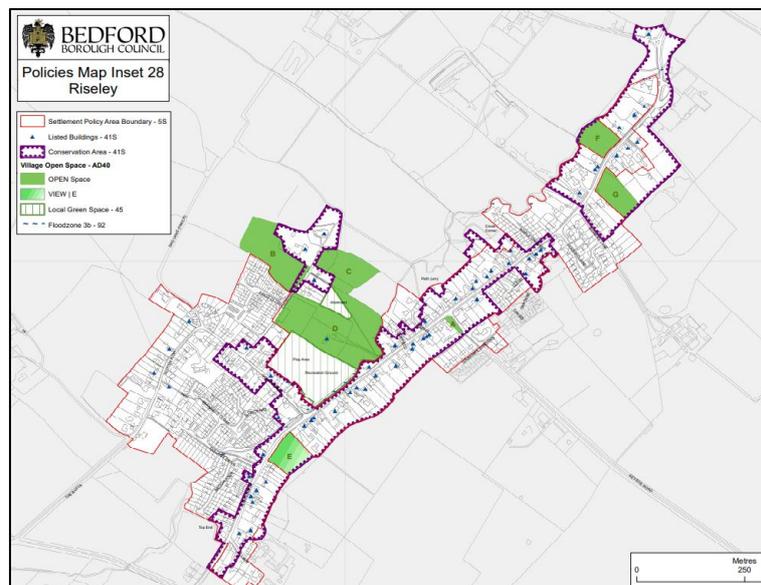


Figure 2. Riseley Policy Map (Local Plan 2030)

### Site Assessment

Optimis propose that the land between no.34 and no.36 High Street, Riseley be allocated for residential development. The site has not previously been considered as part of the Bedford Borough Local Plan but presents a logical development opportunity within an established, sustainable settlement.

Whilst the site is currently located outside the Settlement Policy Area, it presents a logical infill to the village well located to existing built form on three sides. Through the creation of a strong boundary on the south eastern edge the site could be contained, and any future development could easily be incorporated in to the existing pattern of development.

It is acknowledged that the site is currently allocated as an important view. Upon review of the site from High Street, the north western boundary comprises established trees and hedgerows providing comprehensive screening. This thereby limits views into the countryside significantly and potential impacts on the visibility of the landscape are not considered to be adverse. Nonetheless, further assessment of landscape impacts and consideration of these throughout the design of the scheme could be facilitated through the site's allocation. It should also be noted that rural settlements such as Riseley have many sections where views extent into the countryside. This site is not of any great importance and its designation is not sufficient to prevent the much needed delivery of homes in sustainable locations such as this. Form this site, public footpaths extend into the wider landscape where long distance views are afforded.

It is also acknowledged that the site is located within the Riseley Conservation Area. The heavily landscaped north western boundary has the potential to provide significant screening, aiding in the mitigation of visual impacts on the Conservation Area. It is recognised that the site would still be likely to give rise to less than substantial harm on a designated heritage asset and sufficient public benefits should accompany any future scheme to outweigh this. The provision of housing on a site well related to an existing sustainable settlement in response to housing need alongside the delivery biodiversity net gain, associated contributions and further public benefits identified throughout the design process could reasonably overcome this.

Constraints identified in relation to this site are therefore not detrimental to its development and could be overcome throughout the design process to ensure the scheme is deliverable without resulting in adverse harm.

The suggested Policy wording is as follows:

**Policy x – Land between no.34 and no.36 High Street, Riseley**

*Land between no.34 and no.36 High Street, Riseley will be developed for residential use to deliver housing.  
Key principle for development:*

- i. Provision of a range of housing types and sizes.*
- ii. Provision of a landscaping and tree planting scheme within the site and along site boundaries to reduce the impact of the development on wider views and in particular minimise impacts on heritage assets.*
- iii. Provision of a strategically designed and phased Sustainable Urban Drainage Scheme*
- iv. Provision of a flood risk assessment in the context of areas of flood zone 2 to the north of the site.*
- v. Submission of a biodiversity report with appropriate mitigation and enhancements.*
- vi. Provision of a heritage statement that addresses the impact of the development on designated and non-designated heritage assets.*
- vii. Provide a viewpoint with seated area on the southern edge of the development to allow views of the wider countryside.*

Figure 3. Proposed Allocation Wording (Authors Own)

The below indicative parameter plan has been prepared to demonstrate how the site could be developed, identifying landscaping and green space on the site's northern and southern boundary and residential development enclosed in the centre of the site's in line with existing residential development on High Street.

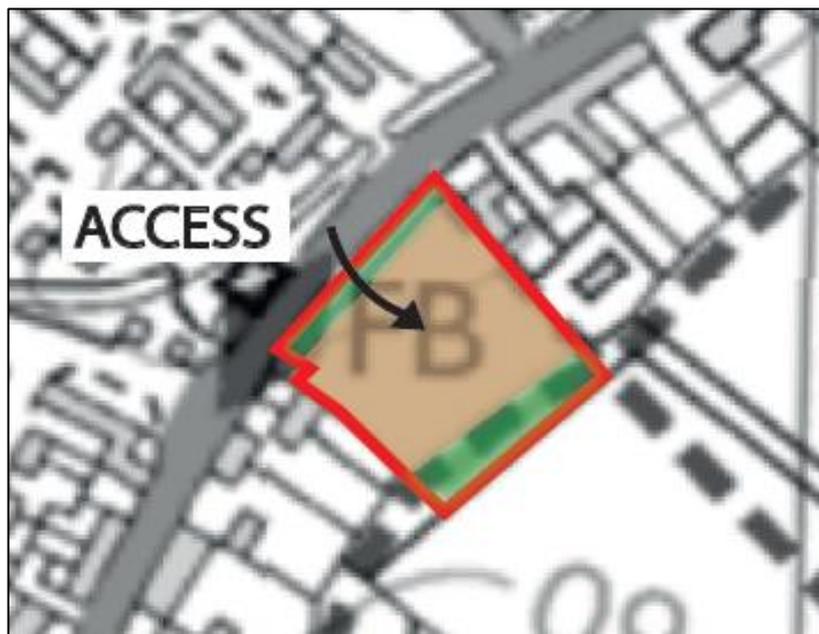


Figure 4. Indicative Development Layout

**Conclusion**

To conclude, it is considered that the emerging Local Plan 2040 and the proposed distribution of housing within it presents an over-reliance on substantial strategic site's and new settlements. The potential of smaller sustainable settlements throughout the borough in meeting housing need has been overlooked in favour of this, having extensive implications on the timescales for housing delivery throughout the plan period.

Riseley presents a logical location for development, comprising one of the most sustainable settlements in the northern area of the borough that would benefit from policy support. Additional but proportionate development in this location could be delivered quickly and provide valuable economic, social and environmental benefits to an existing community. The site outlined above presents a logical option for delivering development of this nature and should be considered by the Council for allocation alongside other extensions to existing sustainable settlement in the borough to alleviate reliance on substantial strategic site's throughout the plan period.

Although designated in the Local Plan as an open view from the village, we consider that the scheme can be developed to retain views from the wider countryside from the southern edge of the site through the positioning of a sensitive viewpoint.

Yours Sincerely,



**Leila Mann** BSc MSc  
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