

Representations to the BBC Reg 19 Plan 2040

Land to the rear of Church End, Biddenham

29 July 2022

BBC Ref: 907

Our Ref: P911b



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1.0 Introduction

- 1.1 Optimis Consulting presents these representations on behalf of our client the [REDACTED] and in conjunction with a national housebuilder who the landowner is working closely with. Their details are provided on the Response Form as attached.
- 1.2 Optimis promotes this site for inclusion in the Bedford Borough Local Plan 2040 (hereafter referred to as the 'Local Plan'). Details of the proposed allocation can be found at Section 3 of this report.
- 1.3 Section 2 of this report provides formal comments to the general policies of the Local Plan and any associated Technical Documents. This covers the representation against the Spatial Strategy in particular.
- 1.4 Section 3 reflects on the absence of allocations directed to the Urban Area and promotes reconsideration of the most sustainable locations to direct development and asks for this site to be included.
- 1.5 This representation relates to BBC site reference 028, the location of the site is shown below in figure 1 and a full assessment of its credentials is contained in section 3.



Figure 1. Location of the Site (Source: Google Earth)

2.0 Representation to the Overarching Policies of the Local Plan and Associated Technical Documents

Local Plan April 2022 – Regulation 19 Pre-Submission

- 2.1 The emerging Bedford Borough Local Plan 2040 is being prepared in response to Policy 1 of the adopted Local Plan 2030. This required that a review of the adopted Local Plan would commence no later than 1 year after the plan’s adoption. The new Local Plan is presented to secure levels of growth in line with national policy and deliver strategic growth in alignment with ongoing and proposed strategic infrastructure developments, including the Oxford – Cambridge Arc, A421 expressway and the Black Cat junction (A1). Moreover, it will direct additional residential development in line with the standard methodology.
- 2.2 The following representations will demonstrate that the Reg 19 Plan is flawed, that it is presently unsound, but is capable with changes to be sound. The Spatial Strategy does not provide a coherent and effective plan to deliver sustainable development and does not consider all relevant alternative strategies or sites. The proposed trajectory is unsound because it seriously overestimates the level of growth that might be delivered from the proposed sites selection. It fails to have regard to the local circumstances in which sites are located. The plan places too heavy a reliance on the delivery of infrastructure that is outside of the control of the Council and is based on overly optimistic timetables.
- 2.3 We consider that there are fatal flaws with the plan and further allocations must be made to provide flexibility, as a minimum. The trajectory needs to be fully reviewed.

Vision and Objectives of the Plan

- 2.4 The delivery of greener, more sustainable, more attractive, and prosperous places to live and work within the borough is supported and reflects the overarching goals of the National Planning Policy Framework for the delivery of development nationally. These are addressed throughout the themes and objectives of the plan showing clear recognition of their importance in ensuring the delivery of sustainable development to benefit local communities and their economies. Furthermore, the ‘Vision’ sets out a clear intention to enhance the sustainability of the borough in response to climate change, adapting and mitigating to its effect through various means. This is of growing importance in planning policy and presents clear acknowledgement of the issues and the council’s desire to employ a robust response through the themes and objectives that are set.
- 2.5 The value of protecting the open countryside through sensitive development is not disputed, local landscapes throughout the borough are of significant value, providing the setting for sporadic rural settlements surrounding the primary settlement of Bedford Town. It is agreed that appropriate development in rural locations is of value in supporting the delivery of much

needed housing and employment and rural facilities and services, provided the intrinsic character and beauty of the countryside is respected.

- 2.6 The 'Vision' makes very bold statements about the delivery of infrastructure, and this must go further than to simply 'support growth', it must underpin the delivery of the spatial strategy, and be front-loaded so that without it the major strategic allocations do not make a head start and risk overloading the existing substandard network. Major residential development is "*much needed*" but it cannot be reliant on a strategy that places the burden and control over the delivery of infrastructure to outside stakeholders. Lessons from Wixams will tell us that the process of delivering new settlements takes much longer than at first considered and the delivery of key infrastructure must be implemented before work begins.
- 2.7 The 'Vision' stops short of locating development in the most sustainable locations on the edge of the urban area and the most sustainable rural settlements. This is a flawed approach. This is a new plan and whilst regard should be had the recently adopted plan, it must take its own steps to deliver dwellings in the most sustainable locations on the edge of the most sustainable settlements. Presently it does not do that.
- 2.8 In summary, the Vision and Objectives outlined are broadly supported if the applied spatial strategy delivers sustainable development throughout the borough in support of existing settlements, whilst acknowledging the importance of delivering infrastructure in advance of new development especially where it is sensitive to the impacts of development on countryside locations.

Spatial Strategy

- 2.9 Draft Policy DS2(S) sets out the spatial strategy, noting development will be focused within the urban area, at strategic locations adjacent to the urban area and at growth locations within the A421 and East West Rail corridor.
- 2.10 The Spatial Strategy outlines the delivery of development in the urban area through the redevelopment of previously developed land. Whilst the value of this is acknowledged in making effective use of the land, these sites are often challenging to deliver due to the high technical constraints that exist. Contamination, degraded land, ecological issues, legal and title constraints together with leaseholder concerns, together with the high cost of redevelopment often make these sites very difficult to develop, but moreover they cannot be relied upon to be developed in any fixed period. They are all classic windfall sites, or opportunity sites; but they are not suitable for allocation.
- 2.11 The allocation of these brownfield sites for redevelopment overlooks their potential to comprise windfall development throughout the plan period. Windfall sites are generally seen as tools in bolstering identified supply and addressing shortfalls in housing delivery but their allocation means that the Council can no longer fall back on these sites to cover under delivery. Their inclusion in the brownfield register (as they all should be) presents its own 'commitment' as a potential contribution to overall housing delivery numbers, but to allocate

as well is an unsound basis for demonstrating the delivery of 'new' housing requirement for the Borough.

- 2.12 The Spatial Strategy also places significant reliance on the delivery of substantial isolated greenfield sites and new settlements. As outlined in the Stepped Trajectory Topic Paper (2022), that supports the emerging Local Plan, a range of assumptions are made in order facilitate the delivery of these settlements within the plan period. These comprise the delivery of substantial infrastructure projects on which the delivery of new settlements will be wholly reliant. Many of these infrastructure projects have been in the pipeline for a significant period of time and have experienced substantial delays in the past. Their timely implementation cannot be assured and yet the Council rely on this to happen. The reliance placed on the delivery of these strategic greenfield sites and new settlements for the delivery of homes through the Local Plan is considered to comprise significant risk and is highly likely to result in a shortfall throughout the plan period.
- 2.13 However, the real flaw in the planned spatial strategy is that the Council has not considered all reasonable alternatives and has not sought to identify sites in the most sustainable location, that is on the contiguous edge of the Urban Area, or inside the Urban Area. These sites have been overlooked in their assessment and we urge that this is reviewed.
- 2.14 This is the most sustainable location for growth. The Council must include these sites in advance of the identification of new settlement locations, especially where there is clear deliverability and cooperation with landowners and developers to pursue their development.
- 2.15 It is considered that the Spatial Strategy is flawed, overlooking sustainable locations for development in favour of uncertain new settlements and difficult brownfield sites that should be left as windfall opportunities. The Council has not looked closely at the preferred alternative site locations on the edge of or within the Urban Areas, such as the site that this representation relates.

Amount and Timing of Housing Growth (DS3(S))

- 2.16 The plan covers a 20-year period from 2020-2040 and the spatial strategy deployed in this case sees development and delivery of much needed residential units delayed until the latter half of the plan period to facilitate the lengthy preparation, consultation, submission and consideration of planning applications and the delivery of infrastructure to support existing and future residents. Draft Policy DS3(3) sets out the delivery of housing throughout this period, identifying 9,700 units to be delivered in the first 10-year period and 17,000 to be delivered in the second 10-year period. This is a wholly unrealistic breakdown and places extreme pressure on the second half of the plan. On an annual basis the final ten years of the plan expects a rate of delivery that is nearly twice the previous ten years. Moreover, this has never been achieved in Bedford borough, historically.
- 2.17 As context, the Housing delivery test identified that in the past three years, Bedford has delivered 964, 1255, 1371, 1371, 1026, and 1203 dwellings per annum in the past 6 years

respectively. Significantly below the expectation of 1,700 per annum per year over 10 years. There is a very strong likelihood that the delivery in the second half of the period will delay and reduce leaving a potential huge undersupply of homes.

- 2.18 Whilst the Council can demonstrate a 5-year housing land supply at this time, this stepped approach that sees housing unevenly distributed throughout the plan period may quickly lead to an under supply. The need for this plan to identify and allocate additional small and medium sites to deliver early homes within the plan period is essential to prevent later delays.
- 2.19 The STPP trajectory provides an overoptimistic estimation for the delivery of HOU14, HOU16 and Little Barford in particular. To consider that these are reliant on rail and road infrastructure delivery including East West Rail and the infamous A1 'Black cat' roundabout works suggest that first completions are expected in 2030 is simply not realistic. That in year 1, each of those sites are proposed to deliver a minimum of 100 units in the first year is also unrealistic, even if they start on 1st April 2030. To suggest that they might achieve completions of 200 plus from year 2 reaching a staggering 600 units per annum in 2037 at Little Barford is without credibility. Wixams has only delivered around 180 per annum on average over its entire period of delivery.
- 2.20 It is worth noting that there are three major sites that are relying on the infrastructure being in place for completions to start on site in 2030, therefore it only takes one of those sites to fall-behind and the trajectory is quickly undermined. Although spreading the risk might be considered a benefit on one hand it also increases the risk of partial failure as there are three chances of that happening.

Reliance on outside bodies to deliver vital infrastructure

- 2.21 The Stepped Trajectory Topic Paper (April 2022) that supports this plan has sought to justify the approach applied to housing delivery in the draft Local Plan. This document notes that *"development at the scale required by the Standard Method requires investment at a commensurate scale to unlock growth"*. Whilst it is acknowledged that the Standard Method identifies high demand for housing and a comprehensive approach in response to this is required, it is considered that the provision of strategic greenfield development and two new settlements exacerbates this need for investment. Furthermore, if the logic is that large new settlements is an essential long-term solution to the high requirement, then pragmatically the delivery of those settlements should be phased over multiple Local Plans and not compressed into one. History shows that new settlements take more than 20 years to evolve and then complete and this significantly longer than the present plan timetable.
- 2.22 The STTP at para 2.2 identifies *"in particular"* both East West Rail and strategic highway improvements need to be delivered to successfully meet the trajectory proposed. These two constraints are extremely difficult to predict and rely on delivery outside of the control of Bedford Borough Council and the land promoters of the sites that rely on their delivery. To base 88% of all allocations in this plan on the delivery further rail, road and other strategic

investment, there needs to be an acknowledgement of the past and a trajectory that builds in flexibility and has a cautious approach to delivery.

Recognising comparable cases (Wixams)

- 2.23 One of the many rail infrastructure requirements is the new station at Wixams, apparently proposed to be operational by 2024. Assuming this is a correct estimation, and this will no doubt be tested at EiP, one only has to look at how the estimation for this being delivered have over time been delayed; from being an essential requirement and justification for the original designation of the Wixams new settlement, the station has become an afterthought, and will be delivered significantly later than expected. (see Wixams a pertinent case study overleaf – Figure 2).
- 2.24 This is the credibility of evidence that the Council needs to reflect upon as they build their trajectory and their basis for identifying strategic sites. Knowledge of the past flawed predictions should be taken as a warning to avoid future failure. Wixams is a case that demonstrates the difficulty of making predications on the delivery of key infrastructure that rely on outside control.

The STPP trajectory is flawed

- 2.25 In short, the trajectory lacks realism, both in terms of the start date for completions and the annual delivery and is therefore highly risky. Reliance on infrastructure provision that is itself reliant on outside bodies undermines the soundness of the trajectory. The STPP lacks realism and there is no recognition to the experiences of the past, such as Wixams, and failing to have regard to such an important understanding of the issues that are faced undermines the credibility and soundness of this plan.

Distribution of Growth (DS5(S))

- 2.26 Through application of the Standard Method for calculating housing need, a total of 27,100 new homes are required in the borough over the plan period 2020-2040. The Local Plan Review, therefore, needs to facilitate the provision of a further 12,275 residential units through allocations beyond those previously allocated in the Local Plan 2030, adopted in July 2021, and Neighbourhood Plans. This comprises a total increase of 40% in comparison to the housing growth outlined in the Local Plan 2030.
- 2.27 Draft Policy DS5(S) of the emerging Local Plan 2040 sets out proposals for a total of 13,550 residential units through proposed allocations in line with the Spatial Strategy, resulting in an over delivery of 1,274 units throughout the plan period. The over provision outlined implies shortfalls in delivery with the identified approach are already anticipated and this does add some flexibility, but it is unclear what this is based on. Nonetheless, 1,274 units will not be sufficient in overcoming the potentially significant delays in the delivery of new settlement because of identified risks pertaining to infrastructure delivery and delays in the planning process.

2.28 The draft Policy also refers to the remaining rural areas and villages, however, identifies no additional residential land in these locations. As such, it is not considered relevant to note this within the policy as it does not relate to the distribution of growth as set out in the emerging Local Plan.

The delayed delivery of Wixams – a pertinent case study

We consider that at the heart of our objection to the identification of new settlements in the Plan is the slow delivery of Wixams. Why did it take 30 plus years to deliver homes and is it not sensible and relevant for the Council to have serious regard to this. The history of its emergence and ultimate delivery is as follows:

- The origins of the new settlement of Wixams in planning delivery terms was conceived in the early 1990's, but it was Policy 33 of the BCC 2011 Structure Plan that identified the opportunity for the new settlement when it was adopted in 1997.
- An adopted Development Brief was produced for the Elstow New Settlement in September 1999. The strategy was to deliver 975 dwellings by 2006 and 4,500 by 2011.
- It was first identified in an adopted Local Plan in the Bedford Borough Local Plan 2002 as Elstow New Settlement. It was recognised as Wixams in 2008 Core Strategy, to deliver 2,250 dwellings in BBC (50% in CBC) within the plan period to 2021. The plan also (CP28) allocated the delivery of the Wixams railway station, intended to be delivered between 2002 and 2011.
- Planning permission was granted in outline on 2nd June 2006 (99/01645) for a development of 4,500 homes across BBC and CBC. The application had taken 7 years to progress, despite the background of Structure Plan, Local Plan and an adopted Development Brief.
- The first residents moved in during 2009 – ten years after the original application was submitted, 12 years after it was first allocated in an adopted Plan.
- In 2016 the Annual Monitoring Report indicates that 1,259 of those original 2,250 identified in Bedford Borough remain undelivered (nearly 56%), and even less so in CBC. The delivery of the housing for the new settlement has been delayed far greater than was envisaged by BBC at any of the stages since its allocation in 1997.

Based on past delivery rates, the original phase of 2,250 might be delivered by 2027. This might be longer given the issues of the railway station which was a key feature of the new infrastructure links to the settlement.

Following ongoing issues with funding, the Council has recently committed the money required for the project's delivery. The railway station proposals were published for public consultation in June 2022 and are yet to achieve planning consent for their development. Although there are indications its development might be as early as 2024, this is still a significant delay and should NOT be used as a basis for further growth at Wixams, until it is actually completed and operational – in the next full Local Plan at the earliest.

Wixams is not a completed project it remains work in progress and has fundamentally failed to be delivered in the timescales envisaged, despite a stable economic period of over 5 years the houses and the infrastructure are not being delivered in anywhere near the expectation of the BBC, when it was formulated in the last century.

If it was conceived in 1994 and the final units of the first phase of 2,250 dwellings are completed by 2027, then it will have taken 33 years from start to finish. The average rate of delivery of Phase 1 is only 125 dwellings per annum, despite being developed by multiple developers alongside one another.

Figure 2. The delayed delivery of Wixams – a pertinent case study

3.0 A Proposed Allocation at Church End Biddenham

Potential for development within the Urban Area

- 3.1 Biddenham comprises part of the Urban Area of Bedford Town, and it is approximately 2.5km from Bedford Town Centre.
- 3.2 Given that Biddenham is within the Urban Area of Bedford Town, it is not assessed within the Settlement Hierarchy (2030) and Addendum (2022), however, Bedford comprises the primary settlement in the borough and is therefore the most sustainable settlement. It provides an array of services with unrivalled access to surrounding road networks and public transport services. Development sites on or within its boundaries, therefore, comprises the most logical and sustainable option for the delivery of new growth in the Borough.
- 3.3 Open land to the west of Biddenham has, however, been allocated as Urban Open Space, despite its clear potential to provide some of the most sustainable residential development in the borough. The imposition of this designation in this location is counterproductive to the principles of housing delivery. Residential schemes should be focused within or adjacent to the most sustainable areas within Local Planning Authority areas and the use of designations to limit development in these locations does not conform with the general approach applied to housing delivery nationally.
- 3.4 The concept of Urban Open Spaces and Gaps was outlined in Policy AD43 of the Allocations and Designations Plan (2013). This states that *“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**”*. In the context of the 27,100 units required to be delivered throughout the plan period, as outlined by the Standard Method for assessing housing need, the overall need to deliver significant levels of housing in sustainable locations is considered to outweigh the protection of this land. Freeing up this land for the delivery of housing would avoid the use of substantial areas of open countryside poorly related to existing settlements for the use of residential development when suitable, sustainable and connected sites are available elsewhere. The value of keeping isolated open countryside underdeveloped outweighs the importance of limiting the use of valuable sites on the edge of urban areas. This does not mean to say development in these locations cannot be sensitively developed in the context of urban open space but the option for the delivery of residential development alongside this should not be neutralised.
- 3.5 Whilst a number of sites are located adjacent to Bedford within the Local Plan 2030, including some on the edge of Biddenham, the emerging Local Plan 2040 fails to acknowledge further sites of this nature and instead focuses on housing delivering in large areas of open countryside through the development of strategic greenfield sites and new settlements. The single exception to this is Draft Policy HOU5, which allocates Abbey Field, West of Elstow.

Similarly, to land on the edge of Biddenham, this land had been designated as Urban Open Space, nonetheless, its development for residential development alongside this has not been precluded. This approach should be more actively applied in relation to available sites within the Bedford Urban Area.

- 3.6 Land to west of the settlement, north of the site that is the subject of this report, is allocated for development under the Local Plan 2030 Policy 18 (Land at Gold Lane, Biddenham). This allocation seeks to deliver 160 dwellings as well as strategic open space alongside additional public transport, pedestrian and cycle connections further contributing to the sustainability of the area, reflecting the approach applied in Draft Policy HOU5. The location of this allocation in the context of the site is provided in figure 2 for clarity. This provides clear acknowledgement that this location is considered capable of supporting further residential development.

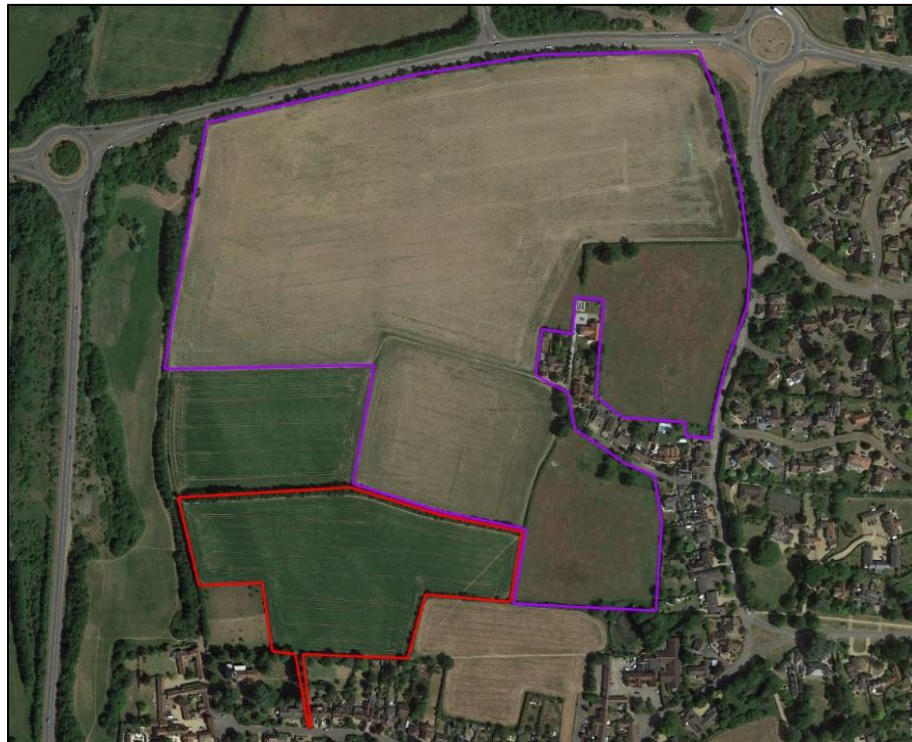


Figure 3. The Site (Red) and land allocated under Policy 18 of the Local Plan 2030 (Purple)

Site Details

- 3.7 The site proposed for allocation is approximately 3.42ha, is located to the rear of development on Church End in the western area of Biddenham. The location of the site is shown in figure 4 overleaf and a Site Identification Plan is provided in Appendix 1.
- 3.8 The site comprises an agricultural field bounded by established trees and hedgerows on all boundaries aside from the southwestern corner of the site which sits adjacent to a cemetery gifted by the landowner to the church. The existing settlement of Biddenham and associated built form abuts the site on its southern boundary and the Gold Lane development being built by Dandara dominates the land to the north. Two smaller parcels of land to the north and east of our site (blue and green stars above), owned by the same landowner are also available

for development and also comprise agricultural land. These two parcels are likely to be presented under separate representations, but we can advise that our landowner and the adjoining landowner of these two parcels are in direct discussions about a joint approach to the delivery of a combined site.



Figure 4. Site Location (Source: Google Earth)

- 3.9 The wider residential area and associated facilities are located to the east of the site. The site is therefore set amongst existing and upcoming development and can be considered well contained. Biddenham St James Church is located to the southwest of the site and comprises a Grade I listed building. Public rights of way are located on the northern, eastern and western boundaries.

Site Assessment

- 3.10 Optimis propose that this site is allocated for residential development in conjunction with land allocated to the north and east of the site. Representations for the site have previously been submitted to the Council for their consideration under the Bedford Borough Council consultation on the Regulation 19 Local Plan: Plan for Submission in 2018 and remains a logical site for development in the context of the emerging Local Plan.
- 3.11 The site is capable of delivering up to 80 dwellings alongside publicly accessible Urban Open Space at a density of 23d/ha. Given the location of the site in the context of the settlement it has the potential to form a well-connected and logical extension to the settlement that will build on allocations previously made in a proportionate and sensitive manner.
- 3.12 An extract of the emerging Local Plans draft policy map is shown below in figure 5 with the site highlighted for context.

- 3.13 It is acknowledged that the development site is located on land identified as Urban Open Space, however, for the reasons discussed previously, this should not preclude its use for the delivery of residential development. A low-density residential scheme sensitive to this allocation can still be delivering in line with the approach applied in relation to Policy 18 and Draft Policy HOU5 of the adopted and emerging Local Plans.

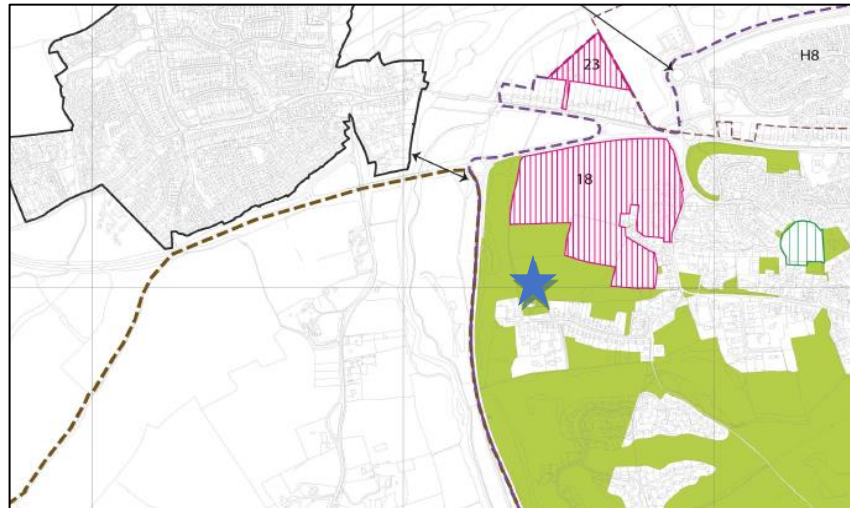


Figure 5. Extract from draft Policy Map for the emerging Bedford Borough Local Plan 2040 with site highlighted (Blue star).

- 3.14 In addition to this, the presence of listed buildings to the south of the site is noted. The Parish Church of St James, a grade I listed building is the only one considered to have a relationship with the site. Nonetheless, through provision of landscaping and separation between the church and new residential development, it is considered impacts can be managed and mitigated in line with the protection that is afforded to this heritage asset. It is recognised a detailed Heritage Impact Assessment will need to be completed for the site and future proposals to assess the extent of harm.



Figure 6. One possible access arrangement for Land to the rear of Church End, Biddenham

- 3.16 The provision of housing on a site well related to an existing highly sustainable settlement in response to housing need alongside the delivery biodiversity net gain and localised green infrastructure, associated contributions and further public benefits identified throughout the design process could reasonably overcome any harm to the heritage assets in the area.
- 3.17 Access is achievable from several alternative positions, and this can be explored with Dandara and adjacent landowners as required. An indicative scheme to deliver an extension to the Dandara scheme to the north has been discussed and is considered below as one alternative.
- 3.18 The site has the potential to supply a range of residential development in response to identified need and the client is willing to cooperate with Bedford Borough Council and the Parish Council to provide the type of housing scheme that is required in this area of Biddenham alongside the provision of enhanced Urban Open Space in response to the existing designation.
- 3.19 The suggested Policy wording is as follows:

Policy x – Land to the rear of Church End, Biddenham

Land to the rear of Church End, Biddenham will be developed for the provision of residential development alongside strategic open space. Key principle for development:

- i. Provision of a range of housing types and sizes.*
- ii. Provision of pedestrian and cycle routes at appropriate locations throughout the development.*
- iii. Provision of a Transport Assessment detailing the impact on surrounding highways and mitigation measures;*
- iv. Assessment of impact on landscape and submission of a comprehensive landscape scheme;*
- v. Development should protect, preserve and where opportunities arise enhance heritage assets and their setting, including:
- Biddenham Conservation Area and listed buildings within, particularly Grade I listed St. James Church, and other local heritage assets;*
- vi. Pre-determination archaeological evaluation;*
- vii. Contribution to the preservation/enhancement of Biddenham Village Pond and the habitats it provides;*
- viii. Assessment of the nature and extent of ground contamination and preparation of a remediation strategy for the site including methods of disposing of contaminated material, measures to prevent the pollution of surface and ground water, and provisions for future monitoring, to be approved by the Council.*
- ix. Provision of a strategically designed and phased Sustainable Urban Drainage Scheme*
- x. Submission of a biodiversity report with appropriate mitigation and enhancements.*

Figure 7. Proposed Allocation Wording (Authors Own)

Conclusion

- 3.20 As discussed in this report, the Emerging Local Plan pays no regard to the importance of sites that are well related to existing sustainable settlements in delivering housing in line with

identified need. Rather, the plan places emphasis on the use of substantial strategic sites and new settlements in large areas of open countryside to deliver housing need, overlooking existing settlements for expansion as is clear from the Spatial Strategy outlined in section 2. It is considered the draft Local Plan should afford more consideration to the potential allocation of sites adjacent to or within the existing the Urban Area.

- 3.21 This site is located within the identified Urban Area of Bedford Town and therefore comprises one of the most sustainable areas for development in the district. It has the potential to provide an uplift on previous allocations in the area but has been overlooked in favour of Urban Open Space and this should not preclude the site from development. The Standard Method for assessing housing need has identified significant demand for housing in the area. On this basis, the overall need to deliver significant levels of housing in sustainable locations is considered to outweigh the protection of this land, freeing it up for the delivery of housing that would avoid the use of substantial areas of open countryside poorly related to existing settlements.
- 3.22 Whilst is acknowledge that the site is located in close proximity to designated heritage assets, it is concluded that impacts in this respect can be identified and overcome through detailed assessment and sensitive design. Furthermore, discussions regarding vehicular access are ongoing with the landowner and a workable solution is in place to facilitate this.
- 3.23 The site outlined above presents a sound option for delivering development of this nature and should be considered by the Council as a preference to the proposed allocations in the plan.