

# Representations to the BBC Reg 19 Plan 2040

Land south of Parkside, Milton Ernest

29 July 2022

BBC Ref: 907

Our Ref: P911a



Tel: 01234 330624

Email: [enquiries@optimis-consulting.co.uk](mailto:enquiries@optimis-consulting.co.uk)

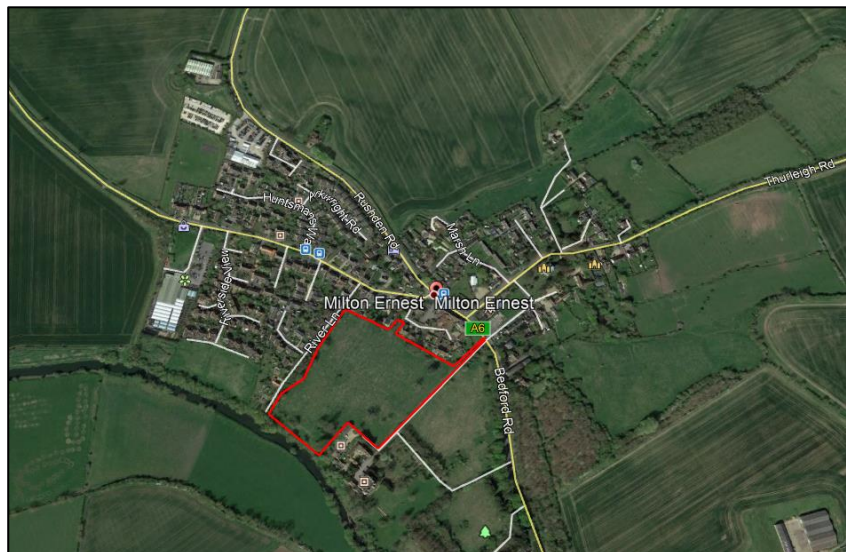
[optimis-consulting.co.uk](http://optimis-consulting.co.uk)

---

## 1.0 Introduction

---

- 1.1 Optimis Consulting presents these representations on behalf of our client [REDACTED] as a Trustee of the Lawton Pension Scheme. Their details are provided on the Consultation Form provided alongside this representation.
- 1.2 Optimis promotes this site for inclusion in the Bedford Borough Local Plan 2040 (hereafter referred to as the 'Local Plan') and details of the proposed allocation can be found at Section 4 of this report which provides a site-specific representation.
- 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 of this report reflects on the absence of any allocations in the Rural Areas and promotes a rethink of the most sustainable locations to direct development.
- 1.5 Section 4 proposes the allocation of this for residential development. This representation relates to BBC site reference 907, the location of the site is shown below in figure 1.



*Figure 1. Location of the Site*

---

## 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 and 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 locations, such as on the edge of the Urban Area, or sustainable rural settlements. 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 sustainable settlements such as Milton Ernest, where 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 of 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 2<sup>nd</sup> 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, 22 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 Flawed Approach to the Rural Area

---

- 3.1 Although reference is made to the role of the rural area in the Spatial Strategy, no formal allocations are made for further development in these locations, other than by reference to new settlements and the two strategic sites at Gibraltar Corner and Willington/Cople. Draft Policy DS2(S) states that development in rural areas will comprise the completion of allocations outlined in the Local Plan 2030 and Neighbourhood Plans. No further development is proposed in these areas as part of the emerging plan. Not only is this a missed opportunity it fails to recognise that the review is intended to apply up to date housing figures from the revised housing needs assessment under the standard methodology and that this applies to 2020 - 2040; not just post 2030. Fundamentally the Council's position is a political one and affords too much protection to existing communities, at the cost of a misconceived approach to sustainable deliverable development. This needs to be reassessed before the plan is tested at an Examination in Public, because there is a serious risk that the plan is found to be unsound.
- 3.2 To add to this point, there is no recognition in the plan that the Neighbourhood plans are only projected to 2030 and therefore there is no reason given as to why allocations in the rural areas cannot be identified for post 2030, through a phased approach to delivery. This concept is discussed below.
- 3.3 The Vision and Objectives seek to promote sustainable growth, and this should be similar to the concept in previous Local Plans in Bedford as the context of the Borough has not changed. It remains a Town and Country Borough with a principle Urban Area and a range of settlements that have different levels of facilities that dictates in a clear hierarchy which are the most sustainable locations for growth.
- 3.4 The Settlement Hierarchy Addendum (2022) supports the emerging Local Plan 2040. The addendum notes that the Key Service Centres and Rural Service Centres identified to deliver growth as set out in the Local Plan 2030, will not change. The Settlement Hierarchy confirms that 6 settlements in the administrative area comprise Key Service Centres. Most of them have allocated around 500 dwellings to be developed in the plan to 2030, all through Neighbourhood Plans. Only Wilstead with zero dwellings and Wootton with 105 dwellings are lower. Wilstead is affected by the role of Wixams whilst Wootton is arguably underprovided given its scale.
- 3.5 Based on the Standard Method for calculating housing need a total of 27,100 new homes are required in the borough over the whole plan period 2020-2040, therefore only 7.8% of housing allocated through the Local Plan 2030, Neighbourhood Plans and the emerging Local Plan 2040 is to be delivered in some of the most sustainable settlements in the borough. Yet allocations in these rural areas would be immediately sustainable, would not be subject to significant infrastructure projects and could be delivered quickly to provide housing in response to current housing need.

- 3.6 The same conclusion can be drawn for Rural Service Centres in the borough, of which there are 10. Whilst it is acknowledged that these settlements are smaller, the settlement hierarchy confirms they still score reasonably high on the rankings. They have good road and public transport links and reasonable levels of service provision. Milton Ernest is the 12<sup>th</sup> most sustainable rural settlement in the Borough and yet it has an allocation of 25 dwellings through a Neighbourhood Plan, amounting to just over 1.25 dwellings to be delivered per annum over the entire plan period. This is a significantly underprovided for the local need of Milton Ernest as well as its important role in the Borough as a whole.
- 3.7 More recognition of the importance of rural settlements in meeting housing need over the entire 20-year period is required in this plan. The strategy proposed places emphasis on the use of large strategic sites located in isolated countryside locations, in some cases near to or adjacent to settlements that are in the lower rural settlements and are simply not sustainable.
- 3.8 The allocation of housing on the edges of existing sustainable rural settlements presents a multitude of benefits both to the settlement and the borough through ensuring quick delivery of housing contributing to housing supply and bolstering the sustainable nature and vitality of smaller settlements in the borough. National Policy recognises this stating *“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.”*

#### A phased approach to delivery

- 3.9 As stated above, the council has sought to protect the settlements in the rural area where an existing NP exists. These NPs cover the period to 2030, therefore there is an opportunity to identify land in these communities post 2030. This can either be through a NP review or and for greater certainty we advocate that specific allocations are made in this plan as Post-2030 allocations. This is a phased approach that it is not uncommon, for example Rochford District Council in Essex applied a two phased approach with a policy that allowed the post-2021 sites. For flexibility these could also be brought forward early under certain triggers such as a lack of a five-year land supply.
- 3.10 The reason why this would work in Bedford Borough is that it would protect the delivery of the NPs and give time for the forward infrastructure delivery of other key strategic sites to make progress and come forward. These Post-2030 sites can then be identified for inclusion in any future LP or NP or be part of a process of delivering dwellings post-2030 alongside other strategic sites.
- 3.11 It should be noted also that the requirement for 2020-2040 is to deliver an annual 1355 dwellings per annum over the 20 year period (based on 27,100 homes in the period 2020-2040). This requirement begins at 2020 and is higher than the requirement set out in the adopted plan for the same year which is 970 per annum (based on 14,550 homes in the period 2015-30). This demonstrates that in the early years of this plan there is a significant uplift required (385 per annum) before the strategic sites contribute and the best location for this

is in the Rural Areas. This should be read alongside the evidence that in 2020 the Housing Delivery Test demonstrated that the deliver was between 1026 and 1203 dwellings in 2020 and therefore the plan in 2020 is already underdelivering against a requirement of 1355 per annum.

- 3.12 The period 2030-2040 in this plan already looks like a daunting challenge and that period does not have any small to medium sites proposed and an opportunity is being missed to deliver sites that are capable of early releases of housing. This approach will allow a greater number and diversity of sites releasing housing across all of the Borough with all capable of contributing to land supply without the issues of an over concentration in one place.
- 3.13 If this site is not considered an acceptable site for the first ten years of this plan, as we believe it should be we would ask that it is considered as an inclusion in a phased strategy post 2030.

---

## 4.0 The Proposed Allocation

---

### Settlement Assessment

- 4.1 Milton Ernest is a settlement and civil parish in Bedfordshire. It is approximately 8km north of Bedford town centre. The village is located on the east bank of the River Great Ouse and is well serviced with easy access to Bedford and Luton to the south and Rushden to the north. The A6 comprises a major road link for the area and runs directly through the settlement. Milton Ernest is therefore located on a key access route to and from Bedford and is well placed in this context.
- 4.2 There are a range of local facilities available in Milton Ernest. The village received a score of 58 within the Settlement Hierarchy Addendum (2022) provided in support of the emerging Local Plan. The Settlement Hierarchy classifies Milton Ernest as a Group 2 settlement, rural service centre. Bedford Borough Local Plan 2030 identifies rural service centres as centres that *“provide a more localised convenience and service role to meet the day to day needs of residents and businesses in the rural areas”*. Rural service centres have good or reasonably good road and public transport links to Bedford. Growth in these settlements is not opposed where it helps to support local services.
- 4.3 The Milton Ernest Neighbourhood Plan (2021) has identified a site at Rushden Road for the allocation of a maximum of 25 units. The Local Plan 2030 has provided evidence to support the allocation of up to 50 dwellings within the plan period to 2030. On this basis, it is reasonable to assume that Milton Ernest can accommodate at least a further 25 residential units throughout the next 10 years, based on the old methodology for calculating objectively assessed need. Further development beyond 2030, the expiry of the Neighbourhood Plan, is also needed to accommodate the needs of the emerging Local Plan 2040.
- 4.4 To conclude, Milton Ernest is well located in the context of surrounding rural and major settlements and comprises a sustainable location for additional residential development. This conclusion has previously been reached by the Council, leading to its promotion for additional development in the adopted Local Plan 2030, however, it is not considered that its potential has been fulfilled and no further development has been considered or proposed as part of the emerging plans beyond the period of 2030 or to account for the under provision in the Neighbourhood Plan.
- 4.5 The settlement can accommodate further growth and it is reasonable to consider that based on the need objectively assessed need for the borough that the settlement of Milton Ernest might accommodate at least a further 50-75 new dwellings, over and above the Neighbourhood Plan allocation. This is made up of the shortfall 25 dwellings in the Neighbourhood plan to 2030 and 50 for the period 2030 -2040. This doesn't take account for the increase in need across the Borough, which could arguably double this number.

### Site Details

- 4.6 The site is located south of Parkside in Milton Ernest, a Group 2 settlement within the Bedford Borough administrative area, and is approximately 4.2 ha in size. Vehicular access to the site is available from Parkside, a cul-de-sac to the north of the site. The location of the site is shown in figure 3 below and a Site Identification Plan is provided in Appendix 1.



*Figure 3. Site Location (Source: Google Earth)*

- 4.7 The site is on an open field comprising scattered tree cover and bounded by trees on its southern and western boundaries. The existing settlement of Milton Ernest bounds the site with residential development on its northern and western boundary. To the south, the site is defined by the River Ouse. Milton Ernest Hall Care Home and Stable Block are situated to the south east of the site and comprise Grade I and Grade II buildings. An open field lies to the east. The site is therefore well contained. In terms of the topography of the site, it declines 5 metres from north to south and there is a clear drop from the edge of the site down to the floodplain several metres below.
- 4.8 The site sits outside the settlement policy area but has no policy designations that restrict its potential for development in the context of the Local Plan.

### Site Assessment

- 4.9 Optimis proposes that this site is allocated for residential development. The site was submitted for Representations by Optimis responding to Bedford Borough Councils 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.
- 4.10 The site is capable of delivering between around 50 dwellings alongside accessible open space. Given the site's location in the context of the settlement it has the potential to form a well-



connected, logical extension to the settlement, with good access to existing services and facilities. Its location in the context of the surrounding settlement is shown below in figure 4.

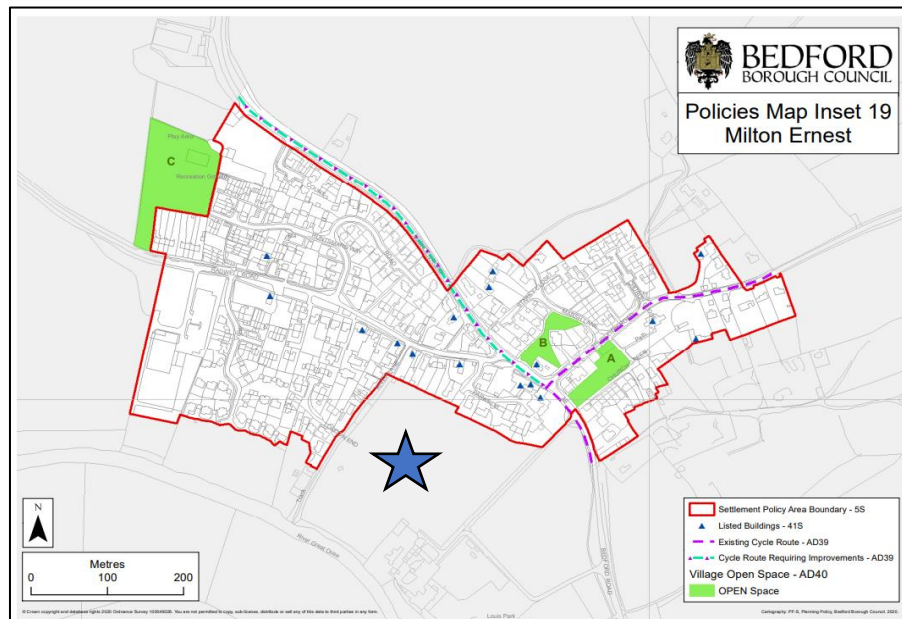


Figure 4. Milton Ernest Policy Map and location of the site (Blue star) (Source: Local Plan 2030)

- 4.11 The site abuts the Settlement Policy Area to the north and west. The main access point to the site is located within the Settlement Policy Area at Parkside and, therefore, provides a logical expansion in geographical terms. A revised settlement boundary would also be robust in physical terms due to the contained nature of the site.
- 4.12 The site was assessed as part of the Milton Ernest Neighbourhood Plan Site Assessment Report (Updated 2019). The site’s availability, capacity, access to surrounding services and facilities, limited impact on the countryside and the site’s well connected relationship with the existing settlement were all confirmed acceptable throughout its assessment. The Neighbourhood Plan Site Assessment Report concluded:
- “The site is a good extension to the existing settlement as in keeping with the existing settlement pattern, however the presence of the Grade I Listed Building to the south of the site and associated Grade II Listed Buildings, as well as the Flood Zones means development to the south of the site is limited”.*
- 4.13 The presence of Flood Zone and Listed buildings to the south of the site is acknowledged and a reduced level of residential development is suggested on this basis. Isolating development in the northern area of the site, adjacent to the settlement, and providing open space to the south provides a strong settlement edge and a green buffer zone to protect future development from Flood Zone and the setting of existing listed buildings to the south east. Therefore, whilst the site is subject to some constraints, it is considered that these can be overcome through sensitive design and management and this has been assessed by qualified experts in ecology, heritage, highways and drainage.

### Proposed Development of up to 50 dwellings

- 4.14 The site has the potential to supply a range of residential development in response to the 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 Milton Ernest.
- 4.15 The proposed development (in a sketch format at Figure 5 below) at the land south of Parkside of around 50 dwellings would be able to deliver a range of benefits for the local community, including:
- Upgrading cycle facilities in the area,
  - Provision of cycle routes,
  - Publicly accessible open space,
  - Contribution and provision of community facilities,
  - Provision of, or contribution towards, existing play facilities,
  - Affordable housing,
  - Provision of bungalows
  - Biodiversity Enhancements



*Figure 5 – proposed illustrative layout for around 50 dwellings*

- 4.16 The site is contained by strong defensible boundaries and connects well to Milton Ernest on its northern edge, therefore, any future development could be easily absorbed within the existing development pattern. In addition to the primary access route on Parkside, there is the potential for further cyclist and pedestrian routes into the site.
- 4.17 In order to maintain a buffer between residential units, flood risk and listed buildings, the scheme would be designed sympathetically and pay due regard to these features throughout the planning process. All significant existing trees are to be retained and reinforced where

necessary as part of an enhanced public open space to provide an attractive river side setting for the community to enjoy.

4.18 The suggested Policy wording is as follows:

**Policy x – Land at Parkside, Milton Ernest**

*Land at Parkside, Milton Ernest will be developed for the provision of residential development of around 50 dwellings together with public open space. 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.*

Figure 6. Proposed Allocation Wording (Authors Own)

### Conclusion

- 4.19 As discussed in this report, the Emerging Local Plan pays little 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. The draft Local Plan should afford more consideration to the potential allocation of sites adjacent to existing key and rural service centres acknowledging their importance in meeting housing need.
- 4.20 Milton Ernest presents a logical location for development, comprising a sustainable settlement within 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.
- 4.21 The site is well connected to the settlement boundary and therefore, if allocated, would create a logical extension to the settlement. Given its close proximity to a range of facilities, the site would be well-serviced for future occupiers. There are no constraints identified that cannot reasonably overcome through assessment and sensitive design and the site provides an opportunity to deliver a sustainable and proportionate scheme to the settlement alongside valuable enhancements and fit for purpose open space.
- 4.22 The site outlined above presents a sound option for delivering development of this nature and should be considered by the Council for allocation alongside other extensions to existing sustainable settlements in the borough to alleviate reliance on substantial strategic sites throughout the plan period. The site has the capacity to deliver around 50 residential units,

and this complies with the growing housing requirement set in this review. Furthermore, if the Council is concerned that the allocation of the site might undermine the recently made Neighbourhood Plan, the Council could allocate the site post 2030, when the Neighbourhood Plan will cease to have any effect.