

Email: planningforthefuture@bedford.gov.uk
Our Reference: P911f

29th July 2022

Dear Sir/Madam,

RE: Brick Kiln Field, off Butler Street, Ravensden

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 infrastructure 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 that 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 recognize 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 sites.

There is no flexibility on the policy to deal with any delays. Not only is this indicative of the problem of selecting sites 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 sites 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 sites proposed on the edge of sustainable settlements. It also relies on the allocation of brownfield sites, some of which will be identified on the brownfield register. As indicated by the NPPF (para 23) these sites 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.

Settlement Assessment – Brick Kiln Field, off Butler Road, Ravensden

Situated in the northern section of the administrative area, Ravensden comprises an established rural settlement. Despite its size, the settlement benefits from good public transport links to Bedford and surrounding settlements, a village hall, public house, corner shop, church, primary school and recreational space. Appendix 4 of the Settlement Hierarchy (2030) with Addendum (2022), that support the emerging Local Plan, categorises the settlement as a Group 3 village with a score of 28. It therefore benefits from a higher score than some of the settlements identified for draft allocations in the plan such as Gibraltar Corner, which scores only 8 in the Settlement Hierarchy.

The current level of housing provision allocated in Ravensden does not support the range of services presently available. In order to maintain these services, additional rural residential development would be beneficial in providing additional investment and economic support. On this basis, It is also important to note the value of development in this location in supporting the rural economy in line with the National Planning Policy Framework. Paragraph 84 notes that planning policies and decisions should enable “*sustainable growth and expansion of all types of business in rural areas*” and “*the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship*”. As such, there is clear benefits to the provision of proportionate residential development in Ravensden which will aid in bolstering the existing economy, making full use of the sustainable services available in the settlement.

Whilst the settlement of Ravensden is small and covers several clusters of development, it is in a strategic location regarding its connections to Bedford. The village is situated less than 1km away from the urban boundary of Bedford and, therefore, benefits from good access to the wide range of services, facilities and transport links available in this area. The presence of services within the village and its proximity to Bedford Town, make it a unique locations for the delivery of sustainable rural development.

The Proposed Allocation

Site Details

The site is located off Butler Road at the crossroads onto Bedford Road, Ravensden. The surrounding area comprises of built form on three sides, two of which are residential. Beyond the built form on its northern boundary, the site abuts a green field site. Access to the site is currently gained off Butler Road. The site has not previously been promoted for inclusion in the Local Plan. 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 Locations (Source: Google Earth)

Bedford Road (B660) sits less than 50m from the site’s entrance and runs south in to Bedford Town, reaching its boundary in 4 minutes. The site is located next to a bus stop that services routes to Bedford, Kimbolton and Pertenhall.

The site comprises of an open field lined by trees and hedgerows on three of its boundaries and a fence on either side of its entrance off Butler Road. The site is located in Flood Zone 1 and a Grade II listed building sits to the east of the site comprising the Old White Lion. The site sits outside the Settlement Policy Area for Ravensden and is not included the adopted policy map for the settlement.

Site Assessment

Optimis propose that Brick Kiln Field, off Butler Road, Ravensden 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 for rural housing located within a residential cluster associated with the settlement of Ravensden.

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

As discussed above Ravensden comprises a sustainable rural settlement with unique access to surrounding Group 1 and primary service centres. It is therefore concluded that development in this location provides an opportunity to not only support the existing services within the settlement, thereby enhancing the rural economy, but also delivering increased economic support to existing services further afield.

It is acknowledged that a Grade II Listed building is located to the east of the site on the corner of Bedford Road and Oldways Road. However, the site's position to the rear of development on Butler Road and Bedford Road mean there is no clear sight lines or relationship between it and the listed building. As such, the development of this site is not considered to give rise to any impacts on the setting or appearance of this building.

The site does not present any technical constraint and is therefore a logical and sustainable site for the allocation of rural homes within the emerging Local Plan.

The suggested Policy wording is as follows:

Policy x – Brick Kiln Field, off Butler Road, Ravensden

Brick Kiln Field, off Butler Road, Ravensden 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 Sustainable Urban Drainage Scheme*
- iii. Submission of a biodiversity report with appropriate mitigation and enhancements.*
- iv. Provision of a landscaping and tree planting scheme within the site and along site boundaries to reduce the impact of the development on the wider open countryside*

Figure 3. Proposed Allocation Wording (Authors Own)

Conclusion

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.

Ravensden demonstrates a logical location for development, comprising a range of services and facilities that would benefit from additional economic support. The settlement is also sustainably located amongst other key sustainable settlements. The site outlined above presents a logical option for delivering sustainable rural development and presents negligible constraints preventing its use for this purpose. Development in this location would benefit from policy support 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.

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Senior Planning Consultant
On behalf of Optimis Consulting Ltd

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