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Our Reference: P911e

29<sup>th</sup> July 2022

Dear Sir/Madam,

**RE: Land at Cranfield Road, Wootton**

### **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 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.

### **Settlement Assessment - Wootton**

Located in the southern portion of the administrative area, Wootton is a rural settlement. The Settlement Hierarchy (2030) with Addendum (2022) designates Wootton as a Key Service Centre within the Marston Vale growth area, classified as a Group 1 village. Wootton benefits from a number of services including a post office, public house, coffee shop, a number of schools, recreational and sports facilities, a convenience store and GP surgery. It benefits from good main road and public transport links to Bedford and has generally improved levels of service provision when compared to settlements that score lower in the rankings. The nature in which Group 1 settlements are distributed across the administrative area means that they can serve their surrounding rural area independently.

The Settlement Hierarchy (2030) with Addendum (2022) places Wootton as the 3<sup>rd</sup> highest in the ranks against all settlements in the Group 1 bracket, scoring 72 within Appendix 4. As one of the highest scoring settlements in Group 1 key service centres, Wootton is considered well-established and has good connections within Bedford Borough. Its strategic location and range of facilities make it a logical location for housing, capable of supporting a growing community. Its proportionate expansion would not only provide economic and social support for the settlement in isolation but also facilitate further improvements to these facilities through financial contributions and investment to the benefit of surrounding rural settlements that rely on the services it provides.

Paragraph 2.23 of the Local Plan 2030 addresses recent growth and change within the Borough. Wootton is described as a '*growth area*' despite being allocated only 105 dwellings in the Neighbourhood Plan within the plan period. The settlement is able deliver significantly more development than this in the context of its sustainability. Only 105 dwellings over 20 years amounts to 5.25 dwellings per annum and is significantly disproportionate to the size and importance of the settlement.

## The Proposed Allocation

### Site Details

The site is located off Cranfield Road, south of Wootton. Despite not being promoted previously for inclusion in the Local Plan, it could prove valuable in quickly delivering short term housing need following assessment of the draft document. The site is approximately 5.3ha and is situated south of Wootton, a Group 1 settlement. The site is accessed directly off Cranfield Road, on its southern corner and its location is shown below in Figure 1. The site identification plan is available in appendix 1.



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

The site comprises of an open field with a cluster of structures in the south-western corner. On three of its boundaries, the site is lined by trees and hedgerows. The site abuts existing residential development and Maple Tree Cottage self-catering accommodation on its southern edge creating a defensible boundary to the south. Residential development adjacent to the eastern boundary of the site beyond Cranfield Road was permitted in 2018 (LPA Ref. 15/02060/MAF) for the Erection of 600 dwellings, including vehicular access, pedestrian and cycle links, public open space, car parking, landscaping, drainage and associated infrastructure works. This demonstrates that substantial strategic development has been considered and approved on the boundary of Wootton, confirming its suitability as a settlement for expansion. Further south on Cranfield Road is additional residential development.

The site and its surroundings are located in Flood Zone 1. As shown in figure 2 below, the site is not within the Settlement Policy Area however is closely related to existing residential development on the southern boundary of Wootton. The site is not located in a conservation area and is not covered by any further policy designations. There are no listed buildings within the vicinity of the site.

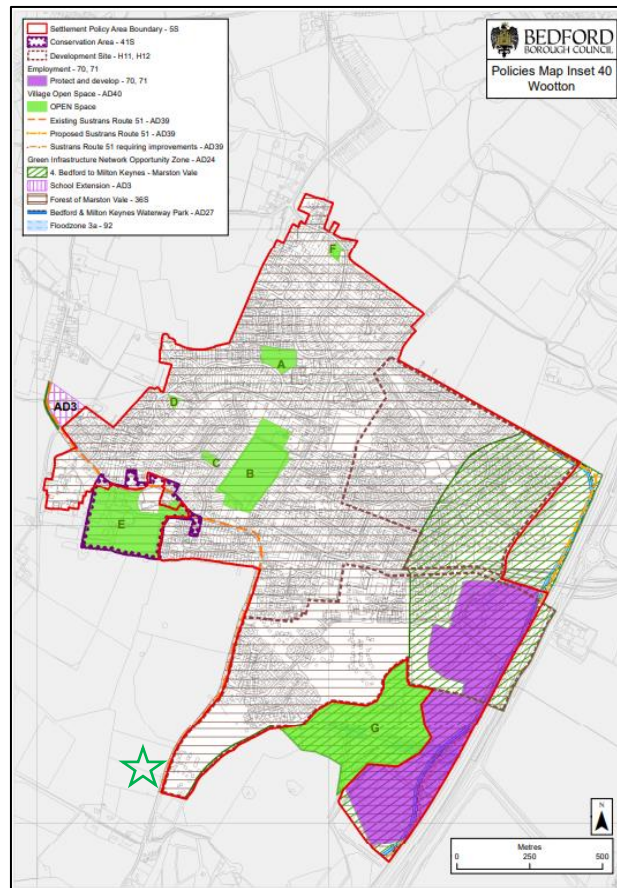


Figure 2. Wootton Policy Map (Local Plan 2030) – Site Identified with green star

### **Site Assessment**

Optimis propose that Land at Cranfield Road, Wootton be allocated for residential development. The site has not previously been considered as part of the Bedford Borough Local Plan however it has been assessed as part of the Wootton Neighbourhood Plan. Wootton has been recognised as a strategic area for development that has the potential to bolster the sustainability and growth objectives as set out in the previous and emerging Local Plan. The site presents a logical development opportunity adjacent to the built area of an established, sustainable settlement.

Although the site sits outside the Settlement Policy Area, it would create a proportionate extension to the existing development located off Cranfield Road acting as a gateway into the settlement of Wootton, particularly if delivered alongside land to the north which is Council owned. Land to the north of the site was assessed within the Wotton Neighbourhood Plan also. The allocation of this site would create a more sustainable gateway development into Wootton as opposed to the existing ribbon development that creates a scattered appearance with dwellings that have no succinct relationship and pattern. The site would create an extension that is logical for a settlement of its nature and scale.

The site is not located within any conservation areas and has not been allocated any policy designation and the site would therefore not pose any major policy constraints to residential development. The landscaping on three boundaries of the site provides valuable screening limiting the potential impacts of future development on the surrounding landscape and open countryside.

The provision of housing on a site in a high scoring settlement is a logical response to the housing need. The delivery of biodiversity net gain, associated contributions and additional public benefits identified throughout the design process would deliver further benefits to this settlement, enhancing its sustainability

The site presents no technical or legal constraint for the delivery of residential development and it is a logical option for allocation within the plan.

The suggested Policy wording is as follows:

**Policy x – Land at Cranfield Road, Wootton**

*Land at Cranfield Road, Wootton will be developed for residential use. Key principle for development:*

- i. Provision of a range of housing types and sizes.*
- ii. Provision of a strategically designed and phased Sustainable Urban Drainage Scheme*
- iii. Submission of a biodiversity report with appropriate mitigation and enhancements.*
- iv. Cohesion with the adjacent residential development to the eastern boundary of the site on Cranfield Road for the promotion of a sustainable gateway for Wootton*
- v. Provision of a landscape buffer to the west and south of the site to protect views from long distance and the amenity of adjacent residents.*

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 western and southern boundary and residential development to the north eastern corner of the site to meet existing residential development on Cranfield Road.



Figure 4. Indicative Parameter Plan

**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 sustainable settlements such as Wootton to meet the housing need has been overlooked which will have extensive implications on the timescales for housing delivery throughout the plan period.

Wootton demonstrates a logical location for development, comprising one of the highest scoring Group 1 settlements in the south-western area of the borough that would benefit from policy support for further housing. The site outlined above presents a logical option for delivering development of this nature and should be considered by the Council for allocation to alleviate reliance on substantial strategic site's throughout the plan period.

Yours Sincerely,

[Redacted signature]

[Redacted contact information]