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Our Reference: P911c

29<sup>th</sup> July 2022

Dear Sir/Madam,

**RE: The Walled Garden, Church End, Willington**

### **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 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 - Willington**

Willington is located in the eastern portion of the administrative area and is an established rural settlement. There are a number of advantages in allocating residential development in Willington such as good public transport links to Bedford, a post office, public house, church, coffee shop, primary school, memorial hall, and recreational space. Appendix 4 of the Settlement Hierarchy (2030) with Addendum (2022) categorises the settlement as a Group 2 Rural Service Centre. The Council states that Group 2 villages have *“good or reasonably good road and public transport links to Bedford and have better levels of service provision than settlements lower in the rankings”*. On this basis, the settlement is considered sustainable, presenting a logical location for proportionate residential development. Willington as 5<sup>th</sup> highest ranking settlement under the Group 2 bracket, scoring 54.

The Bedford Local Plan 2030 describes Rural Service Centres as settlements that provide a *“more localised convenience and service role to meet the day to day needs of residents and businesses in the rural area”*. Policy 4S of the Local Plan 2030 addressed the amount and distribution of housing development in the Borough allocating Willington 25-50 homes throughout the plan period. This allocation suggests that Willington therefore presents a logical location for delivering housing in the eastern area of the borough which has been significantly overlooked for the provision of new homes throughout the adopted and emerging plans.

### **The Proposed Allocation**

#### **Site Details**

The site is located to the southwest of Church End in Willington. It has not previously been promoted for inclusion in the Local Plan, however, following assessment of the draft document it is considered it could prove valuable in quickly delivering short term housing need.

The site, approximately 0.46ha, is located in the western area of Willington, a Group 2 village. The potential for site access is available from a private road to the north of the site. The site is relatively flat and has not previously been developed. The satellite location plan of the site is shown in figure 1 below and the site identification plan is available in appendix 1

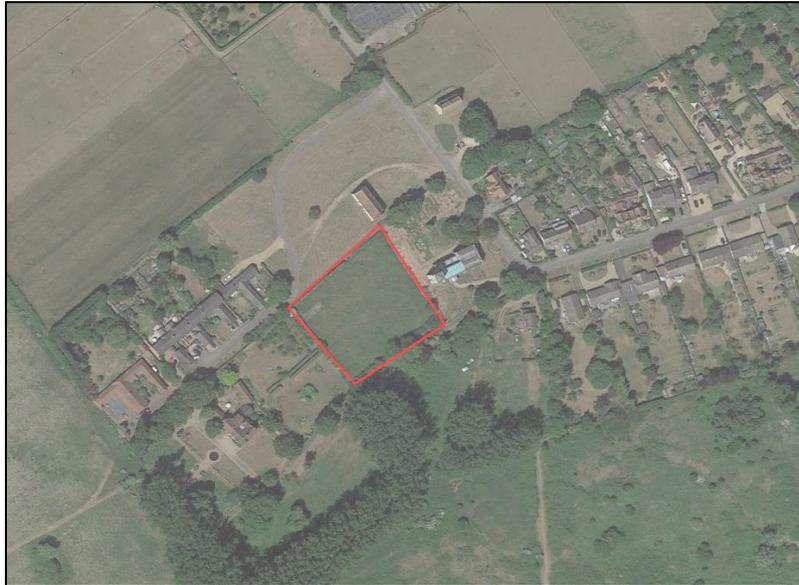


Figure 1. Site Locations (Source: Google Earth)

The site currently comprises open land, lined by walls and landscaping on all boundaries. Landscaping containing established trees and hedgerows is denser on the southern boundary of the site. St Lawrences Church and associated grounds abut the site’s eastern boundary, Willington Stables sits to the north of the site and Manor Farmhouse is situated to the south west. Existing residential development is located to the west of the site and either side of Church Road extending east away from the site.

Willington Stables comprises a Grade I listed building and St Lawrences Church and Manor Farmhouse comprise Grade II listed buildings and wall structure. The site is located within Flood Zone 1 and it sits outside the Settlement Policy Area. The Local Plan 2030 Policy Map is shown in figure 2.

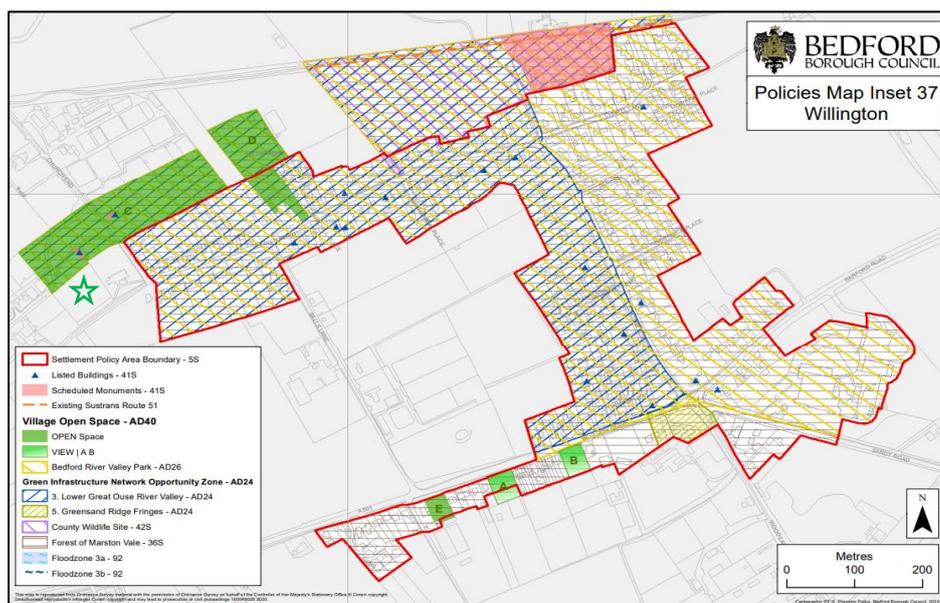


Figure 2. Willington Policy Map (Local Plan 2030) – Site identified by green star

### Site Assessment

Optimis propose that The Walled Garden at Church End, Willington be allocated for residential development. The site has not previously been considered as part of the Bedford Borough Local Plan but presents a logical development opportunity within the built area of an established, sustainable settlement.

Despite the site sitting outside the Settlement Policy Area, it presents a logical extension to the village as it is well located with residential development situated to the west of the site and east of the site on either side of Church Road.

Whilst Willington has a made Neighbourhood Plan, it covers the period to 2030. This Local Plan covers the period 2040 and therefore there is an opportunity to identify this site for development in the latter stages of the plan post 2030.

The site is not within a conservation area and is not subject to any policy designations. The site is bounded by a soft edge to the south comprising of established trees and hedgerows extending west, providing screening. Views into the countryside are therefore not substantial and development in this location would have limited impact on the surrounding landscape. Despite this, further assessment of landscape impacts and consideration of these throughout the design of the scheme could be carried out through its allocation. There are a number of listed buildings within Willington, some in close proximity to the site, any scheme for the site will require sympathetic design and assessment and justification of these features, the potential impacts of the development and mitigation and public benefits that could be employed to outweigh harm.

The constraints identified will not be detrimental to its development and can therefore be overcome provided careful consideration is adhered to throughout the design process. This will ensure the scheme is deliverable without causing adverse harm.

#### **Policy x – The Walled Garden, Church End, Willington**

*The Walled Garden, Church End, Willington will be developed for residential use. 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. The preparation and submission of a Desktop Archaeological Assessment and the preparation of further information recommended thereafter.*
- iv. Provision of a strategically designed and phased Sustainable Urban Drainage Scheme*
- v. Submission of a biodiversity report with appropriate mitigation and enhancements.*
- vi. Development should protect, preserve and where opportunities arise enhance heritage assets and their settings, including:*
  - Grade I listed St Lawrence’s Church*
  - Grade II listed Manor Farmhouse*
  - Grade II listed Wall at Manor Farm*

Figure 3. Proposed Allocation Wording (Authors Own)

**Conclusion**

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

Willington presents a logical location for development; it can deliver short term housing quickly and would benefit from policy to support this objective. Development that is sensitive and proportionate in this location will provide the existing settlement with economic, social, and environmental benefits. The site outlined above presents an option for delivering development of this nature and should be considered by the Council for allocation either immediately or post 2030 to align with the Neighbourhood Plan period.

Yours Sincerely,

[Redacted signature]

[Redacted contact information]