AR/3567

Bedford Borough Council

13th August 2020

Dear Sir/Madam

**BEDFORD BOROUGH COUNCIL – CALL FOR SITES**

This covering letter is provided in support of a Call for Sites submission made on behalf of Blakeney Estates Ltd and which seeks the allocation of land off Church End, Biddenham (henceforth: the Site) for a development comprising the erection of up to 5 dwellings. This covering letter expands on the responses provided on the Call for Sites Form for the site.

The following materials are also provided in support of this submission:

* Site Location Plan

The Site

The Site, shown edged red on the supporting site location plan, measures approximately 1.2 ha and is located along the south side of Church End. The Site comprises untended greenfield land and the existing dwelling at number 21, Church End. The Site is bounded by Bedford Golf Club to the south with the boundary along this margin characterised by a mature hawthorn hedge and Public Right of Way Footpath 15. To the north of the Site is an existing detached two storey dwellings that fronts onto Church End, to the east are rear gardens of existing properties fronting Church End, to the west is an access track and a number of large dwellings. Those dwellings are substantial in scale, and extend up to the southern boundary with the golf course. Much of the Site’s boundaries include existing hedgerows, trees or planting. A small number of trees exist within the Site.

The Site is adjacent to the Biddenham Conservation Area. There are also a number of Listed Buildings, together with a number of older un-designated buildings of local value, along Church End and within the wider vicinity of the Site.

The Site is identified by policy AD43 contained in the Allocations and Designations Local Plan (ADLP) (2013) as an area of ‘Urban Open Space’ and an ‘Urban Open Space Gap’

A detailed planning application (LPA ref: 19/01350/MAF) which sought permission for 15 dwellings was refused by the Council September 2019. A revised detailed planning application (19/02538/FUL) which seeks permission for 5 dwellings is currently being considered by the Council.

The Proposal

The Illustrative Site Layout provided in support of this submission demonstrates that the Site is capable of delivering a quantum of up to 5 dwellings, whilst also providing appropriate levels of parking, landscaping and open space in accordance with the Council’s guidance. This quantum of development is technically achievable and there are no apparent technical constraints that would preclude the Site from being acceptable for a residential use.

Planning Appraisal

The Bedford Borough Local Plan 2030 (adopted 2020) (henceforth: the Local Plan) establishes, at Policy 4S, an ambitious target of delivering 3,169 dwellings over the plan period which amounts to 970 dwellings per annum. The Local Plan Review (LPR) however, which has now commenced, establishes a requirement to deliver 26,100 new dwellings which amounts to 1,305 dwellings per annum. It is necessary to note that changes to the ‘standard method’ wrought by the recently published White Paper may mean that this annual figure will in fact become 1,153 dwellings per annum, which is still substantially higher than the OAN. This challenging housing target will only be met through the pragmatic and proactive allocation of land in sustainable locations, such as that being proposed here. Furthermore, the elevated housing need figure contained in the Local Plan Review fails to take proper account of a number of prominent external factors, including, the nascent Oxford-Cambridge Arc and East-West Rail infrastructure projects and COVID 19. Paragraph 59 of the National Planning Policy Framework (NPPF) (adopted 2019) requires local planning authorities to ‘significantly boost the supply of housing’ and the Council should be seeking to allocate additional land in sustainable locations to meet these aforenoted external factors; the housing need figure is the starting line not a ceiling.

The Site is located within the Bedford urban area. Policy 4S of the Local Plan states that of the 3,169 new dwellings to be delivered over the plan period, with 2,647 to be delivered within the Bedford urban area. The Bedford urban area is therefore a sustainable location for new residential development and a location where in the principle of new development is acceptable.

In considering the aforenoted planning application, the Council’s stated that their justification for designating the Site as ‘Urban Open Space’ and an ‘Urban Open Space Gap’ is twofold: 1) to provide visual break between built up areas to maintain the local distinctiveness of Biddenham; and 2) providing a physical and visual gap between Biddenham and the recent development at Great Denham. Development at the Site would not compromise the purpose of designating this land as ‘Urban Open Space’. Large visual breaks are not commonplace throughout Biddenham and therefore do not contribute towards its local distinctiveness. Further, the fact that the Site is largely obscured from the public realm, and given the low density, loose knit feel of the development being considered, it is clear that the development at the Site will not negatively affect the distinctiveness of Biddenham.

Turning to the sites role in providing a physical and visual gap between Biddenham and Great Denham (Urban Open Space Gap) it should be noted that development to the west of the Site extends right to the edge of existing hedgerow along the southern boundary and has the effect of extending the built form right to this southern hedgerow. Development at the Site would correspond with this southward projection and also benefit from the enclosure wrought by the southern hedgerow. The enclosure of the Site has the effect of delineating the built form of Biddenham from the golf course to the south meaning that when the Site is viewed from publicly accessible vantage points it appears as being strongly associated with the settlement of Biddenham. The Site therefore provides minimal positive benefits in terms of maintaining a visual gap. The golf course however provides clear and sufficient separation between the two settlements, and acts as an obvious green gap that is not associated with either settlement. The visual break provided by the golf course is undoubtably sufficient to provide effective and obvious delineation between Biddenham and Great Denham.

In terms of conservation, it is considered that development at the Site can be delivered in a fashion that that would not impact the setting and significance of the Biddenham Conservation area or surrounding Listed Buildings. This will be achieved delivering a development that utilizes sympathetic and congruent material palettes, a scale and appearance that reflects and respects the surrounding area and a layout that provides a loose and meandering form which will provide ample landscaping and appears as an organic extension to the existing built form. It is considered therefore that development at the Site will have no meaningful impact on the relevant conservation assets, however, if the Council conclude development at the Site would could cause ‘less than substantial harm’ it is clear the benefits of contributing dwellings towards the Council’s challenging demand figure would clearly outweigh any alleged harm.

In all other senses the Site is eminently capable of delivering the proposed quantum of development whilst also adhering to the Council’s standards in terms parking, open space and landscaping.

Conclusion

In conclusion, the materials provided in support of this submission demonstrate that the Site is technically capable of accommodating the quantum of development proposed. The Site is located in a sustainable location and is well related to the existing built from in Biddenham. Development at the Site will therefore not appear as alien or incongruent and will contribute towards the Council’s objective to deliver sustainable development that induces modal shift. Development at the site will also not compromise the setting and significance of the Biddenham Conservation Area or the Listed Buildings in the proximity, nor will it compromise the wider ‘Urban Open Space’ or ‘Urban Open Gap’ classification that this Site is currently part of. In all other senses the Site is eminently capable of accommodating the quantum of development proposed and there are no overriding technical constraints that would preclude it.

The Local Plan Review proposes a challenging housing need figure that also fails to make allowances for major external factors such as the Oxford-Cambridge Arc and East-West Rail. To take full advantage of the benefits that these projects pose, and to ensure that a consistent and sufficient supply of housing is delivered, the Council should be seeking to allocate land to go above and beyond the housing need figure that is eventually adopted. This also coincides with the NPPF objective to ‘significantly boost the supply of housing’. The allocation of the Site represents an opportunity to deliver a sizable contribution towards this challenging housing need in a location that is acceptable and sustainable.

Please don’t hesitate to contact me should you have any questions.

Yours sincerely

For and on behalf of Woods Hardwick Planning LTD

PLANNER