

Ref: GA/AM/03419/L0031am

14th August 2020

Planning Department
Bedford Borough Council
Borough Hall
Cauldwell Street
Bedford
MK42 9AP

Dear Sir/Madam

**Response to Bedford Local Plan Review – Call for Sites
Land between Hookhams Lane and Ravensden Road, Salph End, Renhold, Bedford
On behalf of Manor Oak Homes**

On behalf of our client, Manor Oak Homes, we are pleased to enclose details of their land between Hookhams Land and Ravensden Road, Salph End, for consideration as a location for a sustainable extension up to 400 new dwellings and land for a new primary school. This letter should be read alongside the standard form that has been submitted through the Council's online portal.

In support of this submission, we are pleased to enclose electronic copies of a suite of drawings and detailed technical reports that accompanied our client's recent planning application at the site (reference 19/01974/MAO) and which is now the subject of an appeal. While that application was refused by the Council, this was on the grounds that it proposed development on land currently in the open countryside at a time when the Council consider it is able to demonstrate a 5-year supply of housing land. What the application did serve to do was demonstrate the relative lack of constraints to which the site is subject and its suitability for housing in the event of an identified need – in this case, as part of the next plan review.

In the first instance we are pleased to re-affirm that the site is:

- **Available:** The site is being actively promoted by our clients, Manor Oak Homes, who wish to use this submission as an opportunity to once again state the availability of the land for allocation in the emerging Local Plan and indeed for immediate delivery;
- **Suitable:** The site is in an entirely suitable location for a residential-led development being immediately adjacent to the Bedford urban area and the Settlement Policy Area of Renhold/Salph End, this being

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evidenced by the Council’s decision to identify it as a possible allocation in an early iteration of the now adopted Local Plan 2030.; and

- **Deliverable:** The site is devoid of any physical, legal or environmental constraints and capable of contributing towards the housing and economic needs of Bedford Borough in the first 5-years of the plan period. In addition, the land is promoted by Manor Oak Homes, a company with a strong track record of securing implementable residential and mixed use planning permissions that have in turn led to the delivery of a substantial number of large scale developments across the South East and Midlands.

This submission is supported by the following suite of drawings and technical reports, all of which were submitted in support of the recent planning application at the site:

- **Enclosure 1:** Parameters Plan, prepared by RG+P Architects;
- **Enclosure 2:** Transport Assessment and Addendum, prepared by MAC Consulting;
- **Enclosure 3:** Design & Access Statement, prepared by RG+P Architects;
- **Enclosure 4:** Landscape and Visual Impact Assessment, prepared by Aspect Landscape Planning;
- **Enclosure 5:** Heritage Assessment and Addendum, prepared by Asset Heritage;
- **Enclosure 6:** Archaeological Desk Based Assessment, prepared by MOLA;
- **Enclosure 7:** Preliminary Ecological Assessment, prepared by Aspect Ecology;
- **Enclosure 8:** Arboricultural Impact Assessment, prepared by Aspect Arboriculture; and
- **Enclosure 9:** Flood Risk Assessment, prepared by MAC Consulting.

Background

As officers will undoubtedly be aware, the submission of our client’s site towards the current Local Plan Review follows a significant recent history of promotion of the land for a sustainable residential development.

Our client’s first engagement with the Council in respect of the submission site took place in July 2017. This was in response to the Local Plan Consultation Paper that identified the land, along with two further parcels to the south and south east, as a single sustainable urban extension to the north of Bedford. At this point our client’s submission provided clarification that the site was under their sole control with further representations comprising a range of technical information demonstrating the deliverability of the site. This was intended to further inform the Council’s evidence base that had already found the land to be deliverable, suitable for development, devoid of any technical and legal constraints and sustainable in every respect.

Upon publication of the next draft of the Local Plan, however, and despite our client’s submission of a substantial suite of evidence demonstrating the suitability of the site for a sustainable extension on the northern edge of the Bedford urban area, it was removed as an allocation. This was largely in light of the Council’s preference towards growth at a new village at Colworth along with an escalation of the delivery of the large urban sites to the south of the town centre.

At this stage our client raised concerns that a significant opportunity to secure an entirely sustainable and swiftly deliverable new development of approximately 400-500 homes including a new school had been missed. Instead, the Council chose to pursue a range of sites with significant constraints on their delivery. The concerns of our client were well-founded – the first of these sites, a new village at Colworth, was promptly removed in a further iteration of the plan following irreconcilable concerns raised by Santa Pod raceway in respect of noise impact. In addition, the Council’s two largest urban sites, at Ford End Road and South of the River, had a significant number of homes removed from the early years of their trajectory by Local Plan Inspectors who had significant doubts regarding their early delivery.

On this basis our client made representations towards the Local Plan Examination in Public, with ARP representing them at the round table sessions. The point was made again that the site the subject of this submission represented an ideal opportunity to secure deliverable growth at a sustainable location on the edge of the urban area. In response the Inspectors sought to consider the merits of alternative sites such as those of our client at several of the round table sessions. A revisiting of the Council's strategy was not forthcoming as it was clear that the Inspectors were keen to ensure that the Council had a plan in place swiftly. An immediate review was recommended instead.

This left my client with no option but to submit an immediate planning application to further the promotion of the site. That application (Ref: 19/01974/MAO), which sought outline planning permission for up to 400 dwellings and land for a new primary school, was submitted in September 2019. Its purpose was to demonstrate that the site is both deliverable and devoid of constraints and to reaffirm my client's commitment to progressing the site towards delivery as swiftly as possible.

This 'Call for Sites' submission follows closely behind the refusal of, that application on the 24th June 2020. That decision has since been appealed with a public inquiry scheduled to begin on 10th November 2020 and a decision anticipated by early 2021.

The application was principally refused on the basis that it conflicted with the current adopted Local Plan 2030 as it lies outside both the settlement boundaries of Salph End and Bedford and therefore in the open countryside, where development is restricted. This, of course, is a factor that would not be weighed in the same way against our client's site when considering its potential allocation (as opposed to a planning application proposal). The other reasons for refusal were technical matters that are capable of being resolved.

Otherwise, and bearing in mind the compelling case for the delivery of a substantial level of new residential development across the Borough during the forthcoming plan period, a clear opportunity exists for the allocation of a sustainable development on the edge of the Bedford urban area that would contribute up to 400 new dwellings, a new school and a significant level of formal and informal open space.

Moving forward, it is clear that a significant supply of sites that are free of constraints and deliverable now must be identified and allocated through the current review process to ensure that the annual increase in new homes at the Borough can be accommodated in full. It is our view that this step should have been taken as part of the current Local Plan 2030 to avoid the need for this immediate review. This is particularly so given the continuing concerns that remain in respect of the ability of Council's current urban area sites to deliver the new homes needed by the Borough, both now and into the later years of the adopted plan period.

We note that five different spatial options have been presented as part of the initial Issues and Options Paper, which is currently the subject of consultation and to which our client will be submitting representations in due course. Our client's site would align with at least two of the options proposed – Urban Growth and Dispersed Growth. On this basis the consideration of our client's land now would enable the Council to prepare for the allocation of a site that would allow Officers flexibility when identifying the final spatial strategy for the Borough.

Principally, our client's site remains available for an allocation that has previously been identified positively by Officers and, if allocated in the Local Plan 2030, would by now be subject of a well progressed reserved matters application with first delivery anticipated within the next 12 months.

The Proposed Development

Reflective of the scheme determined as part of the recent planning application, the general arrangement of which is demonstrated by the parameter plan at **Enclosure 1**, it is considered that the site represents a suitable location for the following development:

- A residential scheme of up to 400 dwellings at a density of approximately 20dph gross, approximately 35dph net, comprising a mix of homes ranging from 1-bedroom to 4-bedroom properties, of which 30% would be affordable housing (albeit it is recognised that this requirement may change as part of the emerging Local Plan Review process);
- A layout that is informed by the Council's 'Achieving Quality in Residential Layouts' Supplementary Planning Guidance as well as one which responds sensitively to on-site constraints and adjacent uses;
- Provision of a range of open spaces throughout the development, including formal areas of play, in line with the Council's 'Open Space' Supplementary Planning Document including a substantial linear area of informal open space through the centre of the site along the stream which is not included in the final open space calculations;
- A site for a new primary school, extending to 2.1ha, that would be well linked to the internal road network and providing appropriate parent drop off points and accessibility via public transport;
- Provision for car and cycle parking in-line with Bedford Borough Council standards;
- A principal spine road formed by two separate access points, the first via the plot of the existing property at No.25 Hookhams Lane and the second connecting with Ravensden Road. All principle internal routes would be designed to be built to adoptable standard with the ability to accommodate public transport services;
- Upgrades to the public rights of way along the northern and southern boundaries of the site as well as additional footpath and cycle links throughout the development;
- Retention and/or appropriate replacement and enhancement of existing habitats and boundary planting/trees as well as habitat enhancements elsewhere within the site;
- The provision of 'Heritage Buffers' around the eastern and northern boundaries of the site to achieve an appropriate relationship with the setting of adjacent listed buildings;
- The provision of a linear publicly accessible wildlife corridor leading north to south through the site and following the line of the existing stream. Additionally, the retention of this space ensures that there would be no proposed development in the areas of the site most prone to surface water flooding whilst accommodating the 9m easement required by the Lead Local Flood Authority; and
- A scheme of drainage and flood attenuation designed to achieve greenfield run-off rates and manage the run-off from the new development, as well as resolve existing instances of surface water flooding along the banks of the stream crossing the site.

Planning Assessment

Access to Existing Services

The site is ideally located to form a sustainable and accessible development adjacent to the northern edge of the Bedford urban area boundary and the Settlement Policy Area of Salph End. It is already well connected to services to the south by existing footways. There is also a bus service that passes through Salph End, taking passengers to the centre of Bedford. All of these facilities can, however, be upgraded as part of our client's proposals as described by the enclosed Transport Assessment and Addendum.

Walking and cycling distances from the site to key local services and facilities are illustrated by the Facilities Plan included at Appendix D of the accompanying Transport Assessment, prepared by MAC Consulting (**Enclosure 2**). It demonstrates that, taken from the point of the proposed new access onto Hookhams Lane, the site is: less than 50m from the village shop and post office; 75m from the nearest bus stop; 550m from the nearest public house; 950m from Putnoe Primary School (albeit the application scheme will provide a new primary school site); and 950m from Mark Rutherford Secondary School and Sixth Form College.

Importantly, in the event that the delivery of development at the site is accompanied by strengthened footpath and cycle linkages the sustainability of the location in respect of access to amenities is not disputed with the Officer Report relating to the recent planning application.

Provision of New Services and Community Facilities

A key benefit of the site is its ability to accommodate the delivery of a brand new two forms-of-entry primary school that would serve Renhold, the surrounding villages and Bedford's northern catchment. In addition to the provision of new housing, including affordable housing, and the economic and social benefits that flow from this, the site also has the ability to deliver a significant level of open space and improvements to public transport services and walking / cycling links.

The school site has been included in recognition of the Council's approach highlighted during the course of the production of the recently adopted Local Plan, where Officers sought new education facilities as part of all new large-scale residential developments. The new school would provide sufficient space for not only the pupils generated by the 400-unit scheme (predicted to be approximately 129 children) but also additional capacity in the local school system as a whole. This would be in recognition of both the limited capacity that currently exists within schools serving the northern fringes of Bedford and the villages beyond. On the basis of the growth envisaged to be accommodated by the Local Plan Review it is anticipated that ability for sites to delivery such facilities will continues to be vital.

The eventual development would also include improvements to the local highway network facilitating improved public transport links and a significant level of new informal and formal open space. The site would include a central spine road that would be able to accommodate a new bus route and ensure that residents have swift and frequent access to these services. Indeed, it is highly likely that the introduction of 400 new homes at Salph End would necessitate the upgrade of the regular services to and from the village which currently are limited providing a significant social advantage to existing residents of Salph End and the villages north of Bedford.

Design and Layout

This submission is supported by a high-level Parameters Plan, prepared by RG+P, which provides a framework for a future detailed masterplan (**Enclosure 1**). Specifically, it identifies the location of the new school site, the developable area, the amount and type of open space to be provided on site along with its location and sets out the proposed points of vehicular access and how they would serve the scheme. This submission is also illustrated by an extensive Design and Access Statement (DAS) contained at **Enclosure 3** that provides a thorough analysis of site constraints and explanation of the suggested design rationale.

The Parameters Plan provides the framework for a well-designed and medium-density residential development that would be characterised by substantial areas of open space, generous plot sizes, legible vehicular and pedestrian routes through the scheme and physical linkages with Salph End to the east and Bedford to the south. As is described in detail within the DAS the Parameters Plan, whilst high level, seeks to ensure that all of the key design requirements of the Council's 'Achieving Quality in Residential Layouts' SPG are capable of being achieved by the development, as are the minimum levels of parking expected by the Council's 'Parking Standards for Sustainable Communities' SPD.

Landscape and Landscaping

The site is not within any designations associated with landscape quality or value although it is noted that the linear western field (to the west of the brook) is currently covered by Policy AD24 of the ADLP 'Green Infrastructure Network Opportunity Zone: Bedford Northern Fringes', forming part of a proposed wider green infrastructure network. Importantly, the site does not fall within a "*valued landscape*" in relation to paragraph 170 of the NPPF.

With this in mind, the illustrative proposals have been developed to ensure that a carefully considered and sensitive, landscape-led approach is achieved. The Parameters Plan has been informed by the immediate context, localised settlement pattern and existing vegetation within the site and the conclusions of a Landscape and Visual Impact Assessment, prepared by Aspect Landscape Planning Ltd (**Enclosure 4**). The proposed layout would adopt a positive, outward looking approach, ensuring that the appearance of the development turning its back on the wider setting is avoided. Importantly, the Parameters Plan shows the location of the majority of the open space on site towards its western boundary, which is intended to maintain a level of both physical and visual separation between the development and the northern edge of Bedford.

Internally, incidental green spaces and tree planting within proposed street scenes would add a further green element to the proposals, creating a sense of place and an attractive settlement for residents. Incidental open spaces within the development would also assist in breaking up the perceived built environment and provide opportunities for feature planting that would contribute to placemaking. Retention of mature trees and hedgerows at the site boundaries are ensured, in particular along the Ravensden Road frontage (eastern boundary), adjacent to Mowsbury Golf Course (western boundary) and the watercourse (internal) to ensure a vegetated approach from Renhold village and the wider footpath network is maintained and enhanced. These measures could all be secured as part of a detailed allocation policy.

The landscape impact resultant of these proposals was considered in detail as part of the recent planning application – limited concerns were raised in respect of the overall extent of the visual impact. Indeed, it was confirmed in the Officer Report relating to the application that views of the application site are restricted from the south along Wentworth Drive / Church Lane / Norse Road and from wider points to the east / north-east / north because of the topography of the land and existing landscape features. It is also accepted that any residual impacts resulting from the development could potentially be further mitigated through additional planting that could be addressed at the reserved matters stage.

Heritage

This submission is supported by a Heritage Statement and Addendum prepared by Asset Heritage which combined considers fully any potential for impact on local heritage assets, namely the Grade II Listed Abbey Farmhouse and Nos 27-35 Ravensden Road (**Enclosure 5**).

The potential for any impact on these assets was considered as part of the recent planning application. It was concluded as part of this that although the inter-visibility between the site and the respective listed buildings is very limited any impact would at worst be less than substantial, it would be prudent to build mitigation measures into the proposed layout to ensure that any longer views of these assets, and their wider setting. Accordingly, the Parameters Plan incorporates a number of 'Heritage Buffers' around the periphery of the site, which it has been agreed with the Council's Conservation Officer would limit any harm to the lowest end of less than substantial.

Archaeology

A comprehensive archaeological desk-based assessment was prepared by MOLA in support of the recent planning application. A copy of this assessment is included with this submission at **Enclosure 6**. Whilst the report identifies that the application site lies within 500m of a local scheduled ancient monument (Mowsbury Hillfort) it is concluded that it is unlikely to contain any significant remains below ground nor would it impact on the setting of the fort.

Specifically, and in respect of below ground deposits, an assessment of the available sources suggests that the site has only a limited potential to contain Iron Age, medieval and post-medieval remains and even then, these are only expected to relate to previous agricultural use of the land. Whilst there is evidence that the surrounding area was likely settled during the Iron Age (for example the presence of Mowsbury Hillfort to the north-west and a potential Iron Age or Roman settlement to the north-east) it is considered unlikely that remains linked to either of these will be present on the site. These known settlements lie at a higher elevation than the proposed development site, which occupies lower-lying land between them. The likelihood of any significant remains existing are also diminished by the intensive modern cultivation of the land.

Regardless of the limited likelihood of any remains existing below ground MOLA will shortly be undertaking a trial trenching investigation on the advice of the Borough's archaeologist. The results of this work will be submitted to the Council in due course.

Highways and Access

The Transport Assessment (along with Addendum) and Residential Travel Plan, both prepared by MAC Consulting and submitted in support of the recent planning application, are included at **Enclosure 2**. Between them these documents demonstrate the proposed vehicular access arrangements at the site – junctions considered to be safe and deliverable by both an independent Road Safety Audit and the Council's own Highways Officer – as well as the likely highways impact of the proposal.

Additionally, the wider highways impact was assessed as part of the recent application. No objection was raised by the Borough's Highways Officer subject to the provision of a number of minor off-site mitigation measures in respect of local junctions, which our client is happy to deliver.

Ecology

A Preliminary Ecological Appraisal (PEA) of the site was undertaken by Aspect Ecology (**Enclosure 7**), which was submitted in support of the recent planning application. The PEA reviewed both on-site and off-site floral and faunal habitats and identified the absence of any designated or non-designated habitats on site, or the presence of any protected species. However, in order to preserve any existing habitats and provide a net biodiversity gain as part of any future development it recommends the compensatory measures:

- The retention and protection of all hedgerows and mature woodland around the periphery of the site;
- The careful placement of any new lighting so as not to impact on local bat activity;
- Habitat compensation for foraging Great Crested Newts across the site;
- The inclusion of wildflower meadows, new hedgerow planting and wetland features on site where appropriate; and
- The creation of new 'hard' habitats through the inclusion of bat and bird boxes and log piles capable of supporting Invertebrates.

As a minimum these measures could be secured as part of a detailed allocation policy to ensure that any biodiversity impact is mitigated. Due to the significant amount of open space that is capable of being secured as part of any development (as shown on the Parameters Plan), along with the creation of a linear area of more natural open space along the route of the brook, numerous opportunities exist to secure biodiversity enhancements and a strengthening of the local Green Infrastructure network.

Trees

A full Arboricultural Impact Assessment (AIA) of the site has been undertaken by Aspect Arboriculture (**Enclosure 8**). Whilst the site is largely devoid of trees due to it comprising two large agricultural fields and where trees do exist these are generally around the site boundaries. A number of trees in the north east, north west and south east corners of the site are the subject of Tree Preservation Orders (TPOs).

The Parameters Plan has been informed by a survey of the existing tree stock, and a review of relevant policy tests. Based on this plan, the arboricultural impact of the proposed development is expected to be minor and limited to the clearance of a small number of unprotected trees required to secure the vehicular access to the site. No high or moderate quality trees, or trees scheduled within TPO 01/1956, TPO 02/1967 or TPO 22/1993, would need to be removed to accommodate the development. It would be possible to mitigate for the removals required to for the proposed accesses with the provision of appropriate replacement tree and hedgerow planting both around the periphery of and indeed across the site.

Agricultural Land

On review of Natural England's Agricultural Land Classification mapping for the East of England Region it is clear that our client's site falls entirely within Grade 3 land, presenting a possibility that it may fall as best and most versatile land (Grade 3a). However, it is noted that the grade of agricultural land at a site was not a key environmental consideration as part of the Council's previous site assessment process conducted during the preparation of the current Local Plan 2030.

In any event, the majority of land around the periphery of the Bedford urban area is Grade 3 at the very worst, with large swathes comprising higher quality Grade 2 land. In which case paragraph 170 of the NPPF seeks to direct development away from higher grade land such as Grade 2 to ensure the best supply of agricultural land is maintained. On this basis the impact of the release of our client's site for residential development on the local agricultural land supply would be negligible and indeed preferable to development on higher grade land.

Flooding and Drainage

The site lies entirely within Flood Zone 1, which is classified as having a low probability of flooding and is suitable for all types of development. Within the enclosed Flood Risk Assessment submitted, consideration has been given to any potential for flooding from rivers or the sea, groundwater, sewers or reservoirs and this has confirmed a low probability of flooding from these sources (**Enclosure 9**). Investigations have further confirmed that the site has no record of flooding.

The site has areas of high, medium and low surface water flooding. It is not proposed to locate any new development in the high and medium surface water flood risk areas (as demonstrated by the parameters plan). Whilst some development would be proposed within the low risk areas the finished floor levels of all new homes in these zones would be raised some 300mm above existing ground level and the layout would be designed to accommodate the north to south overland flow routes during an extreme flooding event.

In terms of surface water drainage, a scheme would be deliverable on site that would include a system of piped drains, detention basins and cellular paving that combined would ensure that greenfield equivalent run-off rates are achieved. Any run-off would continue to have an eventual outfall into the local watercourse.

On the basis of all of the above no objections were received from the Lead Local Flood Authority in respect of the recent application.

Site Delivery

Taking the all of this into account, land at Hookhams Lane offers a compelling opportunity to deliver new homes in a sustainable location within the first five years of the new plan period, a delivery programme that would be escalated in the event that the current planning appeal is successful.

Based purely on the Local Plan Review timescales for the purposes of this submission, and assuming a 2023 adoption, we have modelled delivery against the oft-cited Lichfields report 'Start to Finish'¹ which identifies that following the grant of planning permission the average annual build out rate is 60 to 70 dwellings per year for sites of 100 to 1,000 dwellings. On the basis of the submission of a full planning application once the allocation of the site is considered to be secure (likely upon submission to the Secretary of State) we would suspect work to start on site within 6 months of the plan's adoption, so early to mid-2024. Using the upper end of the Lichfields range, and anticipating two flags at the site, it is assumed that completions would take place at a rate of 70 per year. the development is capable of being delivered in full by 2029. These rates of delivery would contribute 260 units to the Council's immediate 5-year supply and, perhaps as importantly, guarantee the delivery of at least 140 dwellings during the 6-10 year period.

The expected annual delivery from the application scheme, factoring in the time until the grant of planning permission (PP), is set out in **Table 1** below:

Table 1: Site Delivery

First 5 years					6-10 years				
23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33
PP	50	70	70	70	70	70	-	-	-

In the event that the current appeal at the site is allowed we would anticipate that these timescales would be shortened significantly. On the basis of a positive decision during the first months of 2021 it is anticipated that this delivery schedule could be escalated by at least two years.

Conclusions

As demonstrated by this submission, and as has been substantially demonstrated by the recent planning application, the site is devoid of any physical or environmental factors that would prevent its allocation for a residential-led scheme. It is in an accessible location on the northern fringe of the Bedford urban area and would be capable of delivering up to 400 new dwellings, alongside a significant level of supporting infrastructure, as part of a sustainable and sensitive extension to Salph End that would make a sizeable contribution towards the housing needs of the Borough over the 10 year period following the adoption of the new local plan, whilst at the same time satisfying any increased requirements for schooling.

We trust that the enclosed information is helpful and of a sufficient level to allow our client's site to be assessed robustly. However, should you have any queries or require any further information to assist this process, do not hesitate to contact me. Otherwise, we look forward to continuing to engage with the emerging Local Plan Review process as it unfolds.

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¹ <https://lichfields.uk/blog/2016/november/8/start-to-finish-how-quickly-do-large-scale-housing-sites-deliver/>