**Call for Sites Submission: Supporting Statement**

**August 2020**

**Land East of Milton Road, Clapham**

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**On behalf of**Blakeney Estates Ltd

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3370

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# 1 Introduction

* 1. The purpose of this statement, prepared on behalf of Blakeney Estates Ltd, is to set out the justification for this site for allocation in the Bedford Borough Local Plan 2030 Review. It demonstrates that in weighing up the site’s technical and other material considerations, it should be included as an allocated site for residential development the forthcoming Local Plan Review (LPR).
  2. Comprised of an irregular parcel of partially previously developed land, the site measures x.xx (phase 1+2 size) ha in size and lies on the northern fringe of Clapham adjacent to existing dwellings along the eastern side of Milton Road.
  3. This Statement is accompanied by supporting evidence which when taken together set out the development of the site would be in general conformity with the NPPF and its objectives and will deliver sustainable development to include both open market and affordable housing.

# 2 Site Description

1. The proposed site measures x.xx (phase 1+2 size) in area and is mainly grassland and shrubland, with part of the site comprising previously developed land.
2. The site is situated to the east of Milton Road, in the northern fringes of Clapham and is no more than a ten-minute walk from the main facilities and services in Clapham. Clapham is identified as Key Service Centre in Bedford Borough Council’s adopted Development Plan, the Local Plan 2030, as it provides a good level of facilities and service provision, meaning it is capable of accommodating growth in a sustainable manner.
3. The northern, western and southern boundary of the site is largely adjoined by existing residential development and gardens that front Milton Road. Intermittent boundary treatment along these borders exist in the form of hedgerows and shrubs. Additionally, there is an existing access taken from Milton Road to No. 130 and Peak Hill Farm.
4. The eastern boundary of the site adjoins the western side of Twinwood Road, with a boundary treatment of substantial hedgerows and shrubs along its length. Twinwood Road’s eastern side contains further hedgerows and shrubs as a landscape buffer to some open countryside beyond and existing development scattered across Duke Drive to the east.
5. The site has no landscape designations, nor is it considered as land within the Green Belt.
6. Two larger sites, Sites 79 and 597 (Council site submission reference numbers from the 2015 Call for Sites) that extend to the northernmost edge of Clapham, which include the application site area, were submitted as part of the Call for Sites in 2015. These were nearly identical, and both proceeded to stage three of the process where it was concluded that the land east of Milton Road could be recommended as an allocation option in the emerging Clapham Neighbourhood Plan in the 2017 Consultation Paper. The site was also identified as a potential option for allocation in the currently adopted Bedford Borough Local Plan 2030.
7. A planning application for outline consent for residential development on the southern section of this site was submitted in May 2020 (ref: 20/00988/MAO). A number of consultation responses were received; none of these responses indicated that site could not fall under the definition of developable as per the NPPF which is for a site to be considered developable, they should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.
8. In the wider context Clapham is 1 mile south of the Brown’s Wood nature reserve which is a Roadside Nature Reserve (RNR). The village sits immediately east of the A6, on which the other side is the settlement of Oakley. To the south of the village is the River Great Ouse. To the north and east of the village is the open countryside. The Bedford and Kempston urban area is 3 miles from the site, which equates to a 25-minute journey by bus.
9. The urban area is strategically located on the A6 and adjoins the A421 on its southern boundary. The urban area, therefore, maintains strong transport links via public highways and sustainable transport methods enabling access to the cities and town of London, Northampton, Milton Keynes, Luton and Wellingborough. All five have excellent rail connections to other major cities and towns, the south east, Birmingham, Nottingham and the north east.
10. The Bedford and Kempston urban area has an excellent diverse mix of facilities and services including: multiple supermarkets and superstores, schools for children of all ages, community centres, libraries, post offices, Doctors surgeries, an infirmary, pharmacies, hot food takeaways, playing fields, public houses (serving food), and a range of open playing spaces accessible to the public.

# 3 Bedford Borough Local Plan Review

* 1. Bedford Borough Council has commenced work on a formal review of their recently adopted Bedford Local Plan 2030. This is formal policy requirement within the adopted plan, Policy 1 requiring the review to commence by 15th January 2021 and a plan to be submitted for examination by 15th January 2023.

3.2 The Issues & Options Consultation Paper states that policies within the adopted plan that make provision for growth need to be updated. The review is necessary so that the Council can respond to longer term growth requirements, and in particular the Oxford to Cambridge Arc, as soon as possible.

3.3 The Review will also need to take into account the imminent changes to the current planning system as set out in the recently published White Paper *Changes to the Current Planning System.* Whilst currently undergoing consultation, it is evident that the objectives and aspirations make clear that a significant uplift to the current housebuilding rates in the UK are sought. This is to be facilitated by a proposed revision to the Standard Methodology used to inform Local Housing Need referred in the NPPF 2019.

3.4 This new approach equates to an approximate national housebuilding target of 337,000 dwellings per year which is markedly higher than what is being delivered at present at 187,000. Affordability will remain a key component as an adjustment factor for the SM indicating that significant new housing is intended to be delivered in areas with affordability issues.

3.3 Furthermore, the review is necessary to monitor the speed with which new development would be brought forward in coming years and progress made by local communities with neighbourhood plans, which the adopted plan relies upon to identify housing sites. The early review gives the Borough the opportunity to intervene, if necessary, to maintain house building rates in accordance with new local and national targets aforementioned.

3.5 The Council accepts that in determining housing need for the area, there are no exceptional circumstances that exist to deviate away from using the standard method for calculating housing need. There is also currently no indication from neighbouring authorities that they require Bedford to accommodate any of their unmet need.

3.6 Using the newly proposed standard method approach Bedford has a housing need of 1,153 dwellings per annum, meaning that if the plan runs to 2040 the total housing need will be 23,060 over a 20-year plan period. This figure can change over time as updates are published on affordability rates.

3.7 Taking account of existing commitments of around 11,000 dwellings, the plan will need to allocate 12,000 new homes to 2040. A new strategy is needed to deliver this growth and it is stated that it may be the case that the local plan strategy combines elements from more than one of potential options.

# 4 Case for the Proposed Site

* 1. This section sets out the specific considerations that demonstrate the site’s suitability as a potential option for allocation under the Review. It includes commentary on the site’s previous Call for Sites history which accentuates the appropriateness of the site’s location within Clapham, together with detailed technical considerations that set out the site is indeed developable and deliverable.
  2. It is important to reflect on the recent history of this site in the context of the preparation of the recently adopted development plan. The proposed site falls within an area of land that was submitted to and assessed under the Call for Sites submission in preparation for the recently adopted local plan. The site reference is Site 597. Does this reference cover the application site and land to the north?
  3. The site has been viewed positively by the Council in the preparation of the recently adopted local plan. In 2017 the Council published its 2017 Consultation Paper, from which emerged the strategy of directing growth substantive growth to Key Service Centres, of which Clapham is one.
  4. For the Key Service Centres, the Consultation Paper listed preferred options for accommodating growth of 500 dwellings. For Clapham, two preferred options were set out, Option 1 being North Clapham (within which this site sits) and Option 2 was East Clapham. By identifying the site as part of one of the preferred options, the site was clearly not deemed by the Council to be unsuitable for development. No specific constraints were identified other than the multiple land ownerships and cooperation required for delivery. The location of the sites at the north of the village was identified as positive as the proximity to the bypass would minimise traffic through the village.
  5. The Consultation Paper was also supported by documents titled ‘Site Assessments and Potential Options for Allocations’ (SAPOA) and ‘Strategic Housing & Employment Land Availability Assessment’ (SHELA), both dated April 2017.
  6. Within the SAPOA, the site was recommended for consideration as an allocation, passing the assessment criteria. There were no objections on highway grounds and the constraints identified concerned the location of the site in an area of archaeological potential and the location near the Roadside Nature Reserve. Commentary is made regarding school provision and that this site in isolation cannot deliver a new school. The key conclusions are that the site was recommended as an option for allocation with no overriding constraints. Within the SHELA the site was determined to be suitable, available and achievable, again allowing a reasonable conclusion that there are no overriding constraints on development of the site.
  7. Ultimately as the Local Plan progressed to the next stage, the Council took the policy decision to devolve the allocation of sites within Key Service Centres and villages to Neighbourhood Plans. This does not divert from the conclusion that the site was considered as part of one of the preferred options for allocation.
  8. Following the policy decision of the Council, the site was further considered as one of four options for potential allocation within the draft Clapham Neighbourhood Plan (CNP). Whilst the draft CNP is at an early stage, and can be given little weight as a result, it does provide an indication of the wishes of local residents in respect of future development in the village and clearly demonstrates the proposed site is not an unacceptable one.
  9. Site 597 was considered in both the Site Assessment (SA) and Site Assessment Addendum (SAA) undertaken by AECOM on behalf of Clapham Parish Council (CPC). The SAA includes the most up to date information of the submitted sites following amendments made since the SA. The SAA summarised the four options arising as a result of the site assessment process under a traffic light rating system: red indicated the site was not appropriate for allocation within the CNP due to insurmountable constraints; amber indicated the site was potentially suitable for allocation within CNP if identified constraints could be resolved or mitigated; green indicates that the site appears to be suitable for development and therefore appropriate foe allocation in CNP.
  10. Site 597, among a few others, corresponds to the growth proposed under Option 1 in the SAA. Option 1 was rated as amber indicating that this land area of land was not unsuitable for potential allocation within the CNP. The constraints identified against Option 1 were:
* Complex land ownership arrangement making securing and delivering infrastructure challenging;
* Three new accesses required to Milton Road, with potential of traffic and highways issues;
* Some of the site is quite elevated and visible in the landscape;

Some benefits of the option include:

* Part previously developed land;
* Potential for ecological and biodiversity value given the adjacent Roadside Nature Reserve and hedgerows; and
* Not close to any heritage assets.
  1. The matter of land ownership has since progressed sufficiently such that an application was submitted, as aforementioned, for the southern section of the site in May 2015 to seek outline consent for development. It is no longer considered this is a significant barrier to securing the necessary infrastructure to enable and support a sustainable development.
  2. Whilst that application proposed one access to the site, this larger site proposed for allocation will invariably accommodate the necessary and appropriate numbers of access such that there will be no net detrimental highways impact.
  3. Would be worth listing the range of documents that have been/will be submitted. Nonetheless, current consultation responses received to date on the application for part of the site have not stated the site to be unsuitable, unavailable or unviable. In essence, the site is developable; this includes consideration given to the elevations in the site that raise the sensitivity of the site and surroundings to development. Matters that have been raised thus far relate to the detailed technical considerations for the site which are to be agreed with the Council in any event as part of that application or any future application beyond the establishment of a principle of development for the site. The current application, and thus part of the site, remains supported by the following technical evidence:
* Site Location Plan;
* Site Layout Plan;
* Access Plan;
* Preliminary Ecological Appraisal;
* Protected Species Surveys;
* Biodiversity Metric Calculations;
* Noise Assessment;
* Archaeological Assessment;
* Landscape & Visual Impact Assessment;
* Tree Survey & Arboricultural Impact Assessment;
* Transport Assessment and Travel Plan;
* Utilities Assessment;
* Flood Risk Assessment & Surface Water Drainage Strategy;
* Site Investigation Report;
* Statement of Community Involvement
  1. A number of benefits are associated with the scheme that are mutually supportive and, when taken together, contribute to the three overarching objectives of sustainable development of which there is a presumption in favour as established in Paragraph 11(d) of the National Planning Policy Framework. The balancing exercise required by the NPPF should therefore determine whether there are adverse impacts that would significantly and demonstrably outweigh the benefits.
  2. With respect to the economic benefits of the proposed scheme, the development is well located in close proximity of existing facilities and services essential for day-to-day needs. Development would encourage use of these facilities and service, thereby supporting local businesses. Additionally, the construction period would make a very notable contribution to this industry via the creation of jobs and demand. In the long term, the Council Tax that will be collected will also make important contributions in enhancing the social, economic, environmental conditions of the area.
  3. Social benefits that arise as a result include affordable housing contribution together with mix of housing provided to address local housing need in Clapham and the wider area for small households. Any provision of open market housing, then, should be given significant weight in the context of Paragraph 59 of the NPPF as it is a substantial social benefit with very little, if any, social disbenefits produced by the scheme. The design of the site will would be in accordance with the *Secured by Design* principles to enhance safety and mitigate opportunities and potential for crime and anti-social behaviour.
  4. Insofar as the environmental benefits are concerned, the site would incorporate green infrastructure and enhances permeability in addressing the need for sustainable urban drainage systems. Exceptional connectivity with the with the wider urban promotes healthier and more active lifestyles within the community. The wider picture of the scheme would then present an opportunity for net biodiversity gains as a result of the proposals and changes which enhance the immediate and wider environmental landscape.
  5. Summarily, this Statement demonstrates that the site would make an appropriate sustainable residential development site to meet identified open market and affordable needs in a sustainable location within the Borough and the village itself. This should equally be viewed in the context that there will be additional infrastructure growth enabling such a development across the Borough the accommodate the projections for a further 12,000 new homes through to 2040 than at present. Furthermore, the site is developable and readily deliverable. Blakeney Estates are more than willing to work with the Council in terms of providing any detailed information to support an allocation.