

Call for Sites Submission: Supporting Statement

Land At Wootton House, Wootton

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Statement prepared by

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1 Introduction

- 1.1 The purpose of this statement, prepared on behalf of Wheatley PLC, 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).
- 1.2 Comprised of an irregular parcel of partially previously developed land, the site measures 1.75 ha in size and lies on the southwestern fringe of Wotton adjacent to existing dwellings along the western side of Jenkyn Road.
- 1.3 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

- 2.1 The site is a paddock of approximately 1.75ha and lies directly adjacent to the built up area of Wootton and the defined Settlement Policy Area Boundary (SPAB). The site is bounded by a substantial border of trees and vegetation along its boundaries. It is bounded by settlement related uses on all sides apart from a stretch of the southern boundary, which adjoins farmland. These comprise the built up area of Wootton and school playing fields.
- 2.2 The site is located within a Conservation Area and near listed buildings. Additionally, the site has been designated as a Village Open Space within the Allocations and Designations Plan 2013. An archaeological desk based assessment was previously carried out and showed there were no known remains on the site.
- 2.3 Wootton is identified as a Key Service Centre in Bedford Borough Council's adopted Development Plan as it provides a very good level of facilities and service provision, meaning it is capable of accommodating growth in a sustainable manner.
- 2.4 Wootton itself is a large village, strategically located adjoining the A421 on its eastern boundary. The village, therefore, maintains strong transport links via public highways and sustainable transport methods enabling access to towns of Bedford, Milton Keynes and Luton. All five have excellent rail connections to London, the south east, Birmingham, Nottingham and the north east.
- 2.5 As a Key Service Centre, the village has a diverse mix of facilities and services including: a supermarket, a Lower School and Upper School, village hall, library, convenience stores, a post office, Doctors surgery, hot food takeaways, playing fields, public houses (serving food).
- 2.6 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

- 3.1 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

4.1 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 Wootton, together with detailed technical considerations that set out the site is indeed developable and deliverable.

Wootton as a Sustainable Location

4.2 The Council's Settlement Hierarchy Background Paper, published during the preparation of the now adopted plan, details the provision of facilities and services of 89 rural settlements, gathered by the rural Parish Councils, to determine locations for development in the context of sustainability.

4.3 Key services and facilities such as: a bus service to a town centre, permanent post office, a primary or lower school, general store, and a GP or other health centre all score 8 points each, the highest awarded to any service of facility under the selected methodology.

4.4 It is noted it is not the quantity of facilities and services that grants settlement a higher score, but the widest range of provision. By that same token, however, it is considered that if a settlement is able to provide a diverse mix of facilities and services it clearly maintains, both, a healthy and competitive local economy and a thriving population which enhances the vitality of the settlement. The only exception to this is the number of shops found within a settlement, where provision of more than six scores a settlement a maximum of 8 points for this category.

4.5 Of the 89 settlements listed within this document, Wootton sits in the top tier of the hierarchy scoring in the top 4 in five out of seven different iterations of the settlement hierarchy, and in top ten of all iterations.

4.6 It is evident that there are very few more sustainable locations for growth in the rural area of Bedford Borough than Wootton. Despite this, Wootton (among other select Key Service Centres) has not received any allocations in the currently adopted Local Plan 2030. Evidently, if this Local Plan Review is to make full effort in meeting the targets of the newly proposed Standard Method which requires an additional 12,000 homes by 2040 (assuming affordability ratios remain constant) then this Council must give every consideration to sustainable locations for growth going forward.

4.7 This is prior to taking into account the context that Key Service Centres such as Bromham, Clapham, Great Barford and Sharnbrook have already received allocations for 500 homes.

If growth is to remain proportional to the size of settlements, other Key Service Centres such as Wootton should facilitate the necessary growth required not only by the Local Housing Need figure, but also by paragraphs 59, 77 and 78 of the NPPF.

- 4.8 Paragraph 59 sets out the Government objective of significantly boosting the supply of homes and this can only reasonably be accomplished *following* the implementation of strategies and necessary allocations to meet the minimum targets for growth defined by the SM.
- 4.9 Paragraphs 77 and 78 establish that the appropriate amount of growth should be encouraged and facilitated to maintain the vitality of rural areas and be responsive to local needs. On the basis that the Review seeks to address a much higher housing target than present it is only prudent and appropriate to consider allocations within Wootton to accommodate local need and ensure the village continues to thrive instead of stagnate and decline.
- 4.10 Taking the above together, it is clear consideration should be given to this site which itself will be well-related to existing development along Jenkyn Road as it will immediately adjoin existing residential development. Furthermore, the site's location within Wootton itself remains one of the most sustainable. This is reinforced by the fact that the site's previous assessment by the LPA under the 2015 Call for Sites concluded it to be very well placed in sustainability terms.
- 4.11 Access arrangements to the site were addressed with the previous submission being accompanied by a Transport Statement demonstrating that capacity exists in the surrounding network and that suitable highway junctions can be provided to ensure suitable access. This information can be provided again if required.

Planning Designations

- 4.12 The site currently is designated as being within a Conservation Area and Village Open Space. For the reasons set out below, neither is a reason why this cannot be considered for potential allocation under the Local Plan Review.
- 4.13 Section 16 of the NPPF makes clear the approach to be taken with respect to proposals that would potentially impact the local historic environment. Particularly, reference is made to the determination of whether a proposal would constitute as less than substantial harm to the character and / or setting of a heritage asset, and whether this would be outweighed by the public benefits of the sites as per paragraph 196.
- 4.14 It is held that a sensitive design can be achieved on the site that would reflect and enhance the immediate local historic environment such that it would not give rise to substantial harm. The existence of the CA and proximity of listed buildings to the proposed

site are not an inherent overriding constraint that would rule the site to be not developable and thus, in this context, could be suitable for allocation.

- 4.15 Of particular note in paragraph 196 of the NPPF is the clarification that the public benefits of a proposal include, where appropriate, securing its *optimum viable use*.
- 4.16 The above is relevant in that it is contended this site does *not* meet one or more criteria of what constitutes Village Open Space as per policy AD40 of the Allocations and Designations Plan 2013. The criteria are:
- A. *They are publicly accessible and valuable to the local community for sport, recreation or as amenity space.*
 - B. *They give identity to a settlement or village by helping to retain its form and reflect past history (examples include village greens).*
 - C. *They provide a gap or break in the frontage which contributes to the character of a settlement for example by providing a view into a village which forms part of the village setting, or a view into open countryside establishing the relationship between the form of the village and the countryside beyond.*
 - D. *The gap provides visual relief in an otherwise built up area punctuating the street scene.*
 - E. *The open space assists the transition between village and countryside providing a soft edge to the village which is pleasing visually*
- 4.17 Firstly, the site is private land and has not been made publicly accessible for sport, recreation or amenity space. It is not visible in the street scene, nor is there an entry for the general public.
- 4.18 Secondly, the complete lack of intervisibility between the proposed site and the listed buildings along Church Road and Hall End Road which warrant the local area being designated as Conservation Area mean that there is in actuality this site does not make a significant contribution to the character and setting of these listed buildings. As per paragraph 201 of the NPPF, the site's location within the CA does not itself indicate that it is an element that contributes to its significance. Rather, it is the listed buildings within the settlement policy area that are the elements that contribute to the significance of the historic environment, particularly given they are visually and functionally separated from the proposed site by existing dwellings and St. Mary's Church.
- 4.19 Thirdly, the proposed site is bounded on all sides by thick and mature hedgerows and, again, has no visibility from the main street scene. It does not provide a view into the village from the wider countryside nor vice versa and thus does not meet criteria C.

- 4.20 Fourth, and as above, the site does not provide visual relief given there is no intervisibility from the street scene. There is no perception of the site performing such a role when viewed from the wider surrounding area given the surrounding development and the screening on the boundaries. It does not meet criteria D, therefore.
- 4.21 Finally, there is an abrupt and stark transition between the countryside and existing dwellings south of Russell Way which line up with the proposed site's southern boundary. There is no screening or substantial planting with residential development visible from wider countryside, including all the way from Wootton Green. The proposed site then cannot assist in any transition which provides a soft edge this does not exist. The site itself, as aforementioned, is bounded thick mature hedgerows preventing views in or out of the village and countryside. For ecological and biodiversity enhancement this boundary would be retained and supplemented thereby maintaining the current visual impact. The open space within the site makes no contribution to any transition to the countryside, nor is there any soft transition further along the settlement's southern extent. Consequently, criteria E is also not met.
- 4.22 Taking the above together, this site has incorrectly and erroneously been labelled as Village Open Space. Plainly, it is not. Whilst on the policies maps it designate it as such, it meets none of the above criteria and is not functionally or practically open space accessible to the public as per the adopted development plan. Therefore, this is *not* a constraint to development of the site when read in its proper context.

Sustainable Development

- 4.23 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.
- 4.24 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.
- 4.25 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 be in accordance with the *Secured by Design* principles to enhance safety and mitigate opportunities and potential for crime and anti-social behaviour.

- 4.26 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 wider urban area 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.
- 4.27 Summarily, this Statement demonstrates that the site would make an appropriate residential development site to meet identified needs in a sustainable location.
- 4.28 Furthermore, the site is readily deliverable and Wheatley PLC are more than willing to work with the Council in terms of providing any detailed information to support an allocation.
- 4.29 It should be taken into full account that the recently published planning White Paper places a significant degree of emphasis on the ability of small and medium-volume developers to produce more housing given that the efficiency of build rates and lead-in times on such sites are markedly higher than larger volume sites. Evidently, there is a clear reliance on firms such as Wheatley PLC, which is indeed one such small to medium volume housebuilder, in facilitating economic recovery and achieving the revised local housing need targets for the nation.
- 4.30 Wheatley equally has every ambition to achieve an acceptable and sustainable scheme at this site given that there exists a well-documented link with Wootton having been long-time owners of the proposed site which in itself arises from their ownership and occupation of Wootton House as the Head office in the early to mid-1980s. Members of the firm have every ambition to continue to realise the development potential at Wootton and enhanced existing relationships with the local community through exceptionally and sympathetically designed developments that ensures the vitality of the local area.



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