

LAND ADJACENT TO 81 MILL ROAD,
SHARNBROOK

Bedford Borough Local Plan Review 2020



Local Plan Review

Have Your Say on the Future of Your Borough

12 August 2020

Land adjacent to 81 Mill Road, Sharnbrook

1. Introduction

- 1.1. Optimis Consulting has prepared this supporting evidence on behalf of our client who owns the land adjacent to 81 Mill Road, Sharnbrook. This supporting evidence responds to the Bedford Borough Local Plan Review 2020 and furthers the submission of land adjacent to 81 Mill Road, Sharnbrook under the Call for Sites exercise.
- 1.2. The supporting evidence is accompanied by the following appendices:
 - Appendix 1 Site Location Plan
 - Appendix 2 Pre-application submission
 - Appendix 3 Pre-application response
- 1.3. The site is approximately 0.8 ha in size and can deliver up to approximately 20 residential dwellings alongside adequate car parking and private amenity gardens. Optimis views it as a suitable, available, and achievable site for residential development and advocates that it should be allocated for small scale residential development.

Land adjacent to 81 Mill Road, Sharnbrook

2. The Surrounding Area

- 2.1. Sharnbrook is a settlement and civil parish in Bedfordshire, England, located approximately 8.3 miles northwest of Bedford and 6 miles south of Rushden. Sharnbrook is situated north of the Great River Ouse and the settlement is designated a key service centre with a population of 2,293.

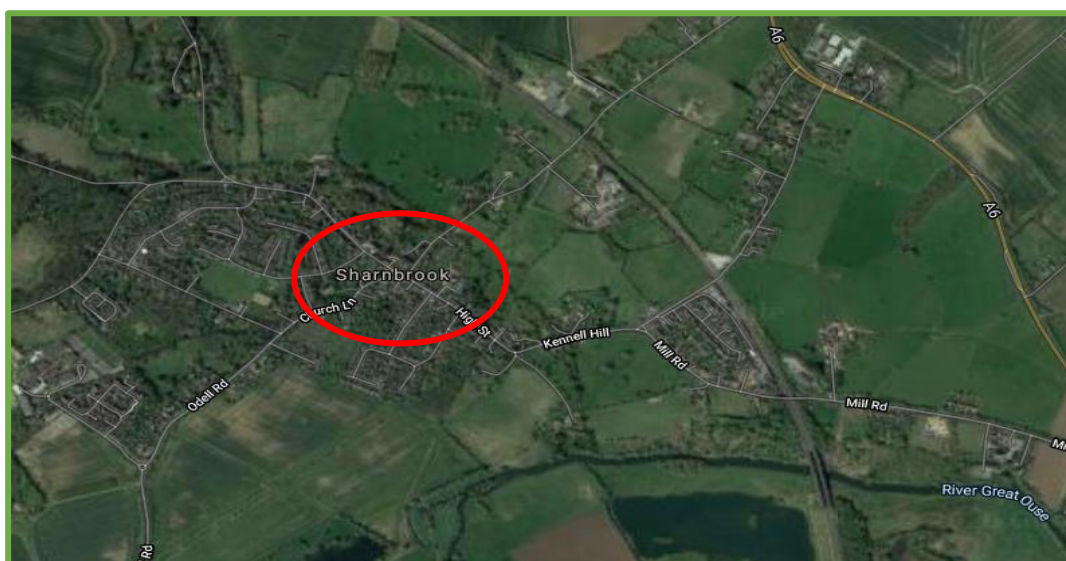


Figure 1: Settlement Location

- 2.2. As a key service centre Sharnbrook offers a wide range of local facilities, and provides a strong service role for the local community and surrounding area. Local Plan policy advises that development should be focused in settlements such as Sharnbrook.
- 2.3. Some key facilities within Sharnbrook are outlined in the table below:

Local Facilities

Doctors	Primary School	Secondary School	Public House	Village Shop	Village Hall	Bus Stop	Sports provision
Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
1.2km	1.8km	3.2km	1.1km	600m	2.4km	500m	3.2km

- 2.4. The site is situated 1.5km away from the settlements centre and Mill Road is linked to the settlement via a shared use footway, allowing people to walk into the settlement. Whilst the site is separated from the main built-up area of the village, several facilities are in close proximity to the site, these include a farm shop 300m away, that sells a variety of daily fresh

Land adjacent to 81 Mill Road, Sharnbrook

produce, Milhouse Hotel and Riverside Restaurant at 300m, additionally, there is a doctor's surgery which is under 1km away, approximately a 10-minute walk.

- 2.5. Sharnbrook is located roughly 7.5 miles northwest of Bedford. Bedford town centre includes a wide variety of services, including a hospital, supermarkets, public parks, colleges, a university, hotels, restaurants, swimming pools and gymnasiums. In addition, Bedford Train Station is located 7.2 miles from the site and provides regular commuter services directly into London.
- 2.6. The village is serviced by a range of bus routes, including the 29 and 50 routes. On Mill Road, there is a bus stop approx. 500m away, which provides a regular service to, amongst others, Bedford and Rushden. The nearest bus stop is serviced by the 50 bus route and is shown below:



- 2.7. Additional bus services are available from Sharnbrook village centre, these provide access to Kettering and Bedford.

Land adjacent to 81 Mill Road, Sharnbrook

3. The Site

3.1. The site is located to the east of Sharnbrook on Mill Road, adjacent to number 81.



Figure 2: Site Location

3.2. The site currently contains large amounts of overgrown shrubland and a small shed to the south of the access. The land levels fall to the rear of the site, where there is a ditch (shown below) that runs down to the River Great Ouse.



Figure 3: Site Location Plan

- 3.3. Whilst the subject site is located outside of the settlement envelope, the area is characterised by several residential properties fronting directly onto Mill Road. Adjacent to the west sits a row of 9 dwellings and on the opposite side of Mill Road are 7 dwellings. A cul de sac residential development is found adjacent to the east at land east of 81 Mill Road, which is a newly permitted development currently under construction. Deeper development is found at Stoke Mill, which lies east of the site where there is a variety of facilities including the theatre and Millhouse Hotel and Restaurant alongside employment at Sharnbrook Grain storage and warehousing. J Hurley & Sons Farm Shop is located to the north of Mill Road and there is an existing footpath along Mill Road providing pedestrian access.

Potential Constraints

- The sites sits in Flood Zone 1
- Surrounded by existing residential land use
- Not located within a Conservation Area
- There are no heritage assets in proximity to the site
- Relatively flat topography
- Site considered to be of low ecological value at a local level
- No public rights of way crossing the site

4. Planning history

Pre-Application Scheme (LPA Ref. 19/00157/PREAPP)

- 4.1. A formal pre-application request was submitted in May 2019 and sought advice on whether a development comprising of 10 two-bedroom dwellings to provide housing for older people would be acceptable.
- 4.2. The pre-application submission was accompanied by a site location plan, existing site layout and indicative proposed layout, these details can be seen in Appendix 2.
- 4.3. The Council's pre-application response (Appendix 3) highlights that the development site, due to its location outside the settlement boundary, is defined in policy terms as being in the open countryside. Nevertheless, it is noted that the site is *"bounded to its east and west by residential properties"*, therefore concluding that *"the building is not physically isolated from other development"*. The case officer also recognises *"that the proposal could potentially contribute to the maintenance of the local rural community"*.
- 4.4. The case officer's pre-application advice also confirms that the parking, road and footway widths and potential visibility of the access are generally considered acceptable.

Outline Planning Application (LPA Ref. 19/02406/OUT)

- 4.5. Following pre-application guidance, an outline application with all matters reserved except access for residential development together with new access and associated landscaping was submitted on 30th October 2019.
- 4.6. The application was set to be approved, however was refused against the newly adopted Local Plan 2030. The Council itself has provided support for these proposals at pre-application stage and through the planning process until the adoption of the new Local Plan. No major objections had been raised regarding technical matters.
- 4.7. It should be recognised that the Parish Council has provided their support to these proposals through the consultation element of the planning process. This expressed support not only addressed the need for the proposed bungalows but welcomed development on this site.

5. Surrounding planning history

- 5.1. There are several examples of planning applications being approved in similar situations, creating a precedent for appropriate small-scale development within the local area. The applications of most relevance in Sharnbrook are identified on the map below.



Figure 4: Local Planning History

- **A: Land east of 81 Mill Road, Sharnbrook 15/02382/MAF** – Erection of 13 no. dwellings, the scheme included 5 no. affordable shared ownership, 4 no. affordable rented and 4 no. open market units. The layout was considered appropriate as it would achieve a higher density and makes the best use of the site. The design and layout of the development was found to contribute positively to the character of the area. Access is off Mill Road, which has a 30mph speed limit and visibility was considered adequate. Approved 4th July 2016.
 - **B: 30 Mill Road, Sharnbrook 14/01993/FUL** - Demolition of existing dwelling and construction of 4 new dwellings including garages and roads. Approved 17th December 2014.
- 5.2. In addition, there are a number of examples across Bedford Borough which are similar to the proposed allocation. The most relevant of these examples is outlined below:
- **Tops Farm, Keysoe Row, East Keysoe – 14/00999/OUT** – Erection of three dwellings following demolition of existing building, with all matters reserved except access. Approved 18th December 2014.

6. The Proposed Allocation

- 6.1. Optimis propose that this site is allocated for small scale residential development, commensurate to its context.
- 6.2. The impact of the proposed allocation is minimised by the site boundaries aligning to existing, strongly defined, residential boundaries on the western and eastern sides. The proposed development would represent infill development amongst existing dwellings and would follow a similar layout already found acceptable within the adjacent housing scheme.
- 6.3. The site is capable of delivering up to 20 bungalows meaning that the proposed allocation would provide much needed housing for the elderly. Given the demand for bungalows which is highlighted in the Housing for Older People Strategy, it is clear that the proposed allocation would contribute towards addressing the Borough's need for suitable accommodation for older persons.
- 6.4. The proposed bungalows would meet the needs of older residents who are seeking to downsize to a more manageable property; therefore, not only would the proposed development provide housing to meet the needs of a growing, aging population, but could also result in the release of family homes by enabling downsizing.

Access

- 6.5. The access is proposed from Mill Road on the northern boundary which has been confirmed as safe and suitable by a Transport Consultant.

Biodiversity Net Gain

- 6.6. At present the site offers a low biodiversity value, the proposed development will seek to provide a biodiversity net gain. In order to enhance the ecological value of the site, native trees could be planted throughout the development, along with a flowering grass mix on green areas.
- 6.7. The proposals would look to retain the hedgerow along Mill Road.
- 6.8. Holes could be provided in boundary features to maintain routes for hedgehogs and bird nesting or bat roosting opportunities could be incorporated into the dwellings.

Flood and Drainage

- 6.9. The Environment Agency Flood Map shows that the site is located within the NPPF Flood Zone 1, 'Low Probability' which comprises land as having less than a 1 in 1000 year annual probability of fluvial or tidal flooding (i.e. an event more severe than the extreme 1 in 1000

year event). The NPPF states that all uses of land are appropriate in this zone. The site would also not be affected during the climate change 1 in 100 year event.


- 6.10. The site is located outside of the Bedfordshire and River Ivel Internal Drainage Board (IDB) area.

Availability and Deliverability

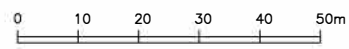
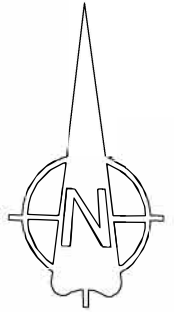
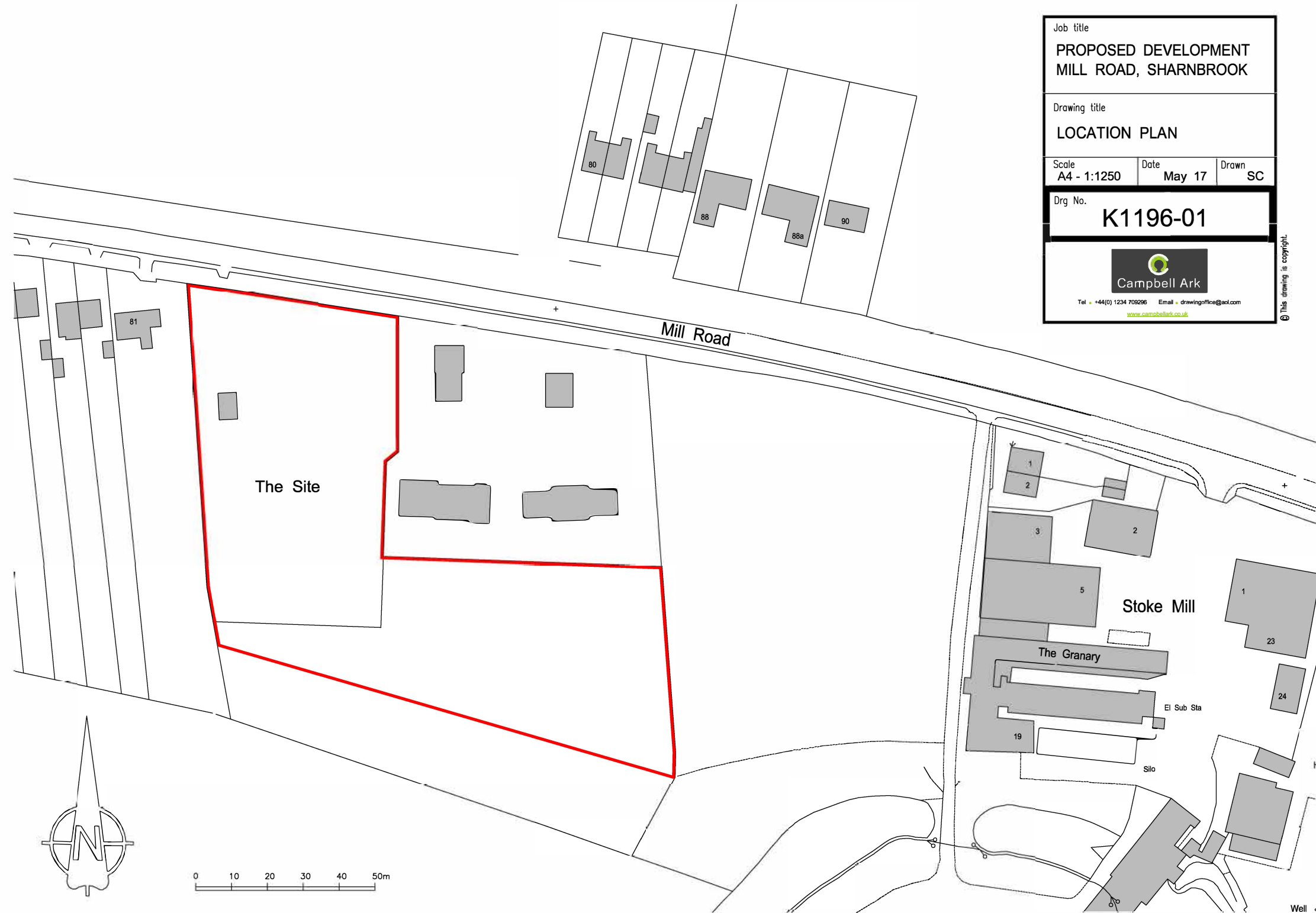
- 6.11. The proposals represent sustainable development, on a logical infill site for residential development. The site is located among residential housing, thus cannot be considered isolated development in the countryside, and is situated in an area with sufficient access to services, facilities, transport and employment. The site is considered suitable, deliverable, and available.
- 6.12. Sharnbrook has organically grown over time and will benefit from small scale residential allocations that will maintain its character and identity.
- 6.13. Once allocated within the emerging Local Plan, which is predicted to be adopted in 2023, Optimis envisage that this site will be delivered by 2024.

7. Conclusion

- 7.1. This site is in a sustainable location with no known constraints and could deliver a residential development of approximately 20 dwellings, alongside adequate car parking and private amenity gardens. Optimis believe that this site should be allocated within the Bedford Borough Local Plan review.
- 7.2. Residential redevelopment of this site will form a natural and logical expansion to Sharnbrook on a small-scale, providing much needed bungalow style housing for the elderly, whilst providing an opportunity to enhance the overgrown and vacant area.

Job title PROPOSED DEVELOPMENT MILL ROAD, SHARNBROOK		
Drawing title LOCATION PLAN		
Scale A4 - 1:1250	Date May 17	Drawn SC
Drg No. K1196-01		
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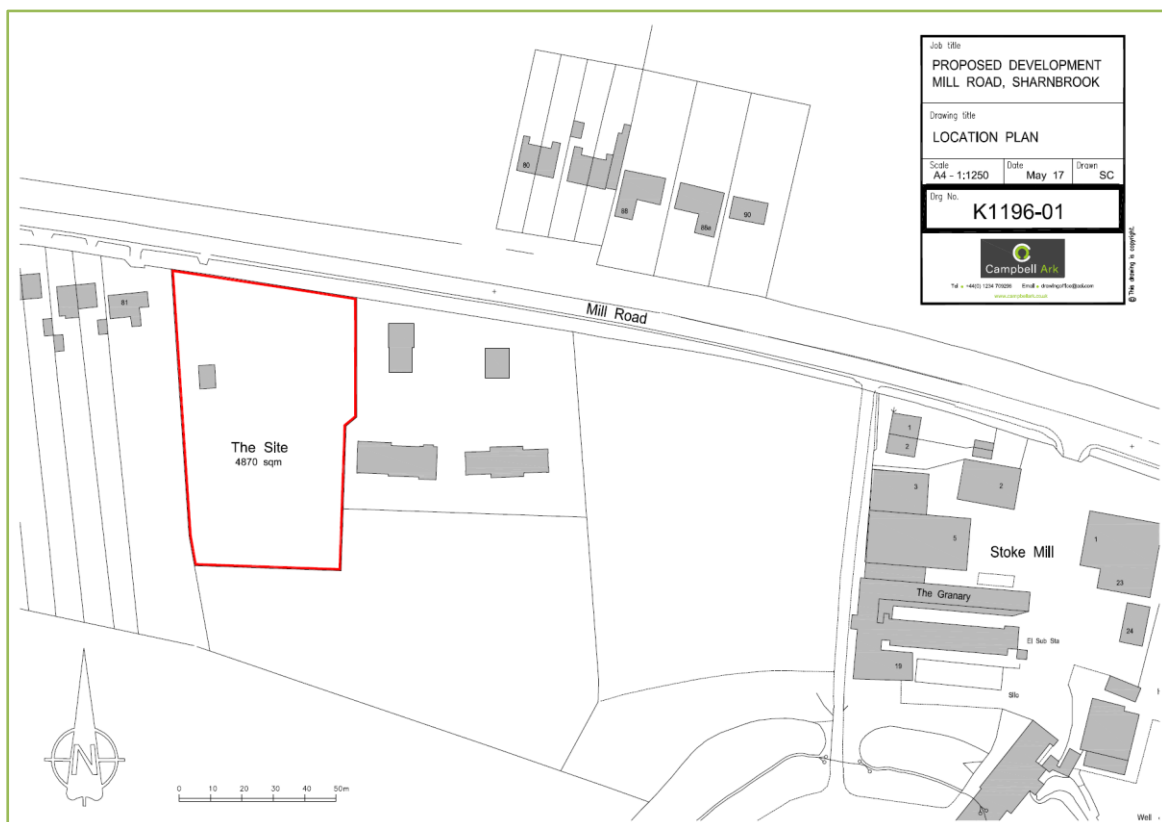
08 May 2019

Dear Sir / Madam,

Pre-application Enquiry: Erection of 10 two-bedroom dwellings to provide housing for older people at Land adjacent to 81 Mill Road, Sharnbrook

I write on behalf of [REDACTED] Limited regarding the above proposal.

This request for pre-application advice relates to the land located adjacent to the new housing development in was a planning application (Ref 15/02382/MAF) was approved. The proposal is for the erection of 10 no. two-bedroom bungalows, with 2 no. parking spaces per unit, together with 5 no. visitor spaces and a new access from Mill Road. The intention is to provide housing for older people in the form of bungalows.



Site Location Plan (Drg. No. K1196-01)



Background

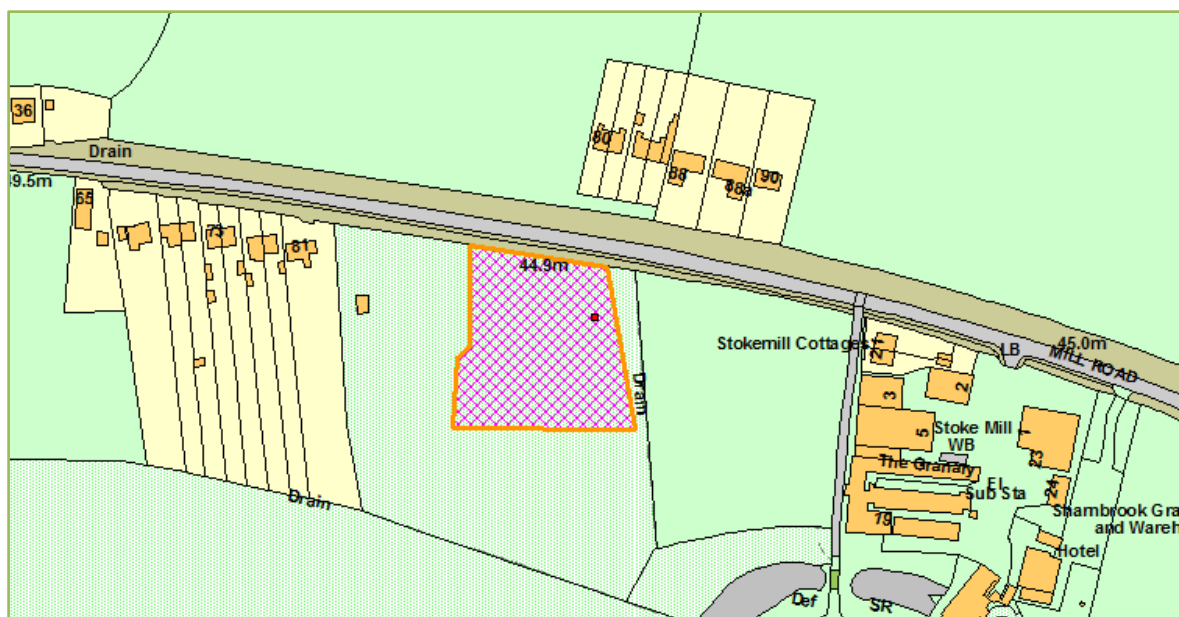
Sharnbrook is a Key Service Centre where the current Local Plan policy advises that development should be focused. Furthermore, Policy CP14 states that where there is a proven need for development to be located in the rural policy area, most new development will be focused in or around the edge of key service centres.

Whilst the subject site is located outside of the settlement envelope, Mill Road is characterised by a number of residential properties fronting onto the Road with deeper development found at Stoke Mill and also the affordable housing site permitted under reference 15/02382/MAF (see below). In addition, Sharnbrook Mill Theatre and Millhouse Hotel and Restaurant are located at Stoke Mill and Hill Farm Shop is located to the north of Mill Road; there is an existing footpath along Mill Road.

Land East of 81 Mill Road – Planning Permission (Ref: 15/02382/MAF)

Planning permission was granted in July 2016 for the erection of 13 no. dwellings and associated development on the eastern section of the land, see below for the site location plan.

The scheme included 5 no. affordable shared ownership, 4 no. affordable rented and 4 no. open market units. The layout was considered appropriate as it would achieve a higher density and makes the best use of the site. The design and layout of the development was found to contribute positively to the character of the area. Access is off Mill Road, which has a 30mph speed limit and visibility was considered adequate.



Location of 15/02382/MAF:

Pre-Application Request (Ref: 17/0327/PREAPP)

A formal pre-application request was submitted to Bedford Borough Council in August 2017, it was considered that in terms of the general principle, it was agreed that there was evidence of a general need for older person's accommodation in the Borough.

At the pre-meeting the fact that there was established residential development along this section of Mill Road was discussed, and there was a need to balance between boosting the supply of homes and the fact that the development would be outside of the settlement boundary. However, it was considered that there would not be merit in pursuing development on this site, particularly for a specialist housing scheme such as bungalows for the elderly.

Therefore, in September 2017 the written pre-application response confirmed that the Council had an identified 5-year land supply, and as such there was “...no proven strategic need for the provision of additional housing development in this location and the development would therefore be contrary to CSRIP Policy CP14.” The pre-application response went on to state that “...there is no proven strategic need and there are no exceptional circumstances which justify development in this location.”

Planning Policy Context

National Planning Policy Framework (February 2019)

Paragraph 61 NPPF states that “Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).”

Planning Policy Guidance

The Planning Practice Guidance states that the need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over. However, many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows (Paragraph: 021 Reference ID: 2a-021-20160401).

Local Plan 5-Year Land Supply Update

Bedford Borough Council published a document in March 2019 regarding the “5 Year Supply of Deliverable Housing Sites 2018/19-2022/23”.

Paragraphs 1.6 and 2.4 of this document states that the Council’s Objectively Assessed Need for the period of 2015-2030 would be 970 dwellings per annum. Whilst, paragraph 2.7 advises that the local housing need would be 1,314 per annum.

Paragraph 5.1 of this document concluded that “...the Council has identified a supply of specific deliverable sites that are likely to deliver an addition 5,107 dwellings in the five-year period. When a 5% buffer is applied for plan making purposes this represents a supply of 5.80 year, for development management purposes this represents a supply of 3.70 years.”

In the Council’s document “Changes to National Planning Policy – Briefing Note for Local Councils” (February 2019) they state that the implications of having a 3.70-year housing supply means that Paragraph 11 of the National Planning Policy Framework will become relevant, which provides that housing proposals should be granted unless:

1. “The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

2. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

This document also goes on to state that as a result of the change in housing supply “...we can expect planning applications to be made on sites where in the past development would not have been supported by our local policies but where landowners and developers consider that the likelihood of them achieving planning permission with reference to it has now tilted in their favour so where in their view any adverse impacts do not outweigh the benefits of granting planning permission.”

The Local Plan Update which advises that the Council now only has a 3.70-year housing supply, is a material change from when the previous pre-application was considered.

Need for Housing for Older People

Housing Strategy Review 2016-2020

This Housing Strategy Review builds on the Housing Strategy 2012-17 and extends it to 2020. This Review should be read in conjunction with the Housing Strategy 2012-17.

Paragraph 2.10 of the Housing Strategy 2012-2017 states that “...the population ages 65+ is predicted to rise by 59% between 2010 and 2030. The change is even more marked with regard to older groups. The population ages 80-84 will rise by 74% and the population 85+ will rise by 123%. This compares to an increase of 14% across the population as a whole within the same period.

Older Persons’ Accommodation Strategy 2018-2023

Bedford Borough Council has drafted an “Older Persons’ Accommodation Strategy 2018-2023,” which was approved for adoption in September 2018, although the final document has not been published.

Paragraph 1.4 considers it of great importance that specialist accommodation is available for older people to meet the future needs, and that it should be noted that “many older persons may not want or need specialist accommodation and want to stay in their own home or general housing. For these people it will be important to ensure that there is general housing available that be adapted to meet their changing needs.”

Furthermore, paragraph 1.11 advises that “...there remains an emphasis to sustain people at home for as long as possible...”, whilst paragraph 1.12 states that “...it is important to ensure the suitability of accommodation and to consider preventative means to enable older persons to live independently for as long as it is feasible.”

Paragraph 2.9 states that “...providing a range of housing options regardless of whether people rent or own their own property will enable older persons to have a greater independence and offer a choice of whether they move to specialist housing or remain in their own homes. In addition, meeting the needs of older persons may release larger family housing for those who need it.”

While the Older Persons’ Accommodation Strategy covers all different types of accommodation and care needs, it seems there will be a requirement for more elderly appropriate mainstream housing, to enable older people to remain independent and within their communities. By providing homes that they are able to downsize to this will also potentially free up larger family homes, within the same or nearby communities.

Bedford Strategic Housing Market Assessment Update 2016 – Report of Findings Addendum Report (August 2018)

The Bedford SHMA Update 2016 established the Full Objectively Assessed Need (OAN) for Market Housing and Affordable Housing for Bedford Borough over the 20-year period 2015-2035. The starting point for the SHMA Update was the CLG 2014-based household projections, which were informed by ONS 2014-based sub-national population projections. (Paragraph 1)

The ONS 2014-based sub-national population projections identified that the population in Bedford would increase by 37,300 persons over the 20-year period 2015-2035. Natural growth comprised 14,200 persons (44,000 births less 29,800 deaths) and a gain of 23,100 persons as a consequence of net migration. The 2016-based projections identified an increase of 33,100 persons over the same period, 4,100 fewer than had previously been projected. The difference was caused by changes to fertility and mortality rates which reduced the projected level of natural change from +14,200 to +9,000 persons. (Paragraphs 5-6)

Need for Older Person Housing

Chapter 5 of the SHMA Update considered the need for older person housing at paragraphs 5.33-35; and further detailed analysis of the need for specialist older person housing was presented in Chapter 6. This identified that the institutional population was projected to increase by around 828 persons over the 20-year period 2015-35 as a consequence of more older persons living in care. The equivalent figures for the period 2015-30 projects that the institutional population will increase by around 508 persons over the 15 years. (Paragraph 21)

The identified backlog at the start of the Plan period remains the same as reported in the SHMA Update. Over the 15-year Plan period 2015-30, the analysis identifies a need for 1,057 additional homes; yielding an overall need of up to 1,400 dwellings to be provided over the Plan period. This includes around 600 sheltered homes (447 owner occupied and 177 for rent) and approaching 750 extra care homes (468 owner occupied and 278 for rent). (Paragraph 24)

The SHMA Update identified that two-thirds of the household growth over the 20-year period 2015-35 (11,600 out of 17,300 households) were likely to have household representatives aged 65 or over. This age group represents 63% of the growth over the 15-year period 2015-30 (8,300 out of 13,200 households) with 39% of the growth during this period having household representatives aged 75+. Given this context, the evidence supports the need for at least 49% of all dwellings to meet Category 2 requirements, providing that this does not compromise viability. (Paragraph 27)

When considering the need for wheelchair adapted housing, the SHMA identifies that the need is likely to increase by 780 dwellings over the period, equivalent to around 6% of the Objectively Assessed Need. This comprises 470 households in market housing (5% of the market housing OAN) and almost 310 households in affordable housing (7% of the affordable housing OAN). The evidence therefore supports the need for a proportion of both market and affordable housing to be wheelchair accessible, and the Council should plan for a minimum of 5% of all market housing and 7% of affordable housing to meet Category 3 requirements. (Paragraph 28)

As previously noted, around two-fifths of the growth in households during the Plan period are households aged 75 or over, who may also be identified as needing specialist housing for older persons. The analysis of the needs of older people identified a need for up to 1,400 specialist older person housing units for households aged 75 or over, whilst the analysis of disability and mobility housing needs identifies a need for around 440 wheelchair adapted dwellings for households in the same age group at any one time (though a higher number of households may need wheelchair

housing at some point as their circumstances change, especially if their health deteriorates). Therefore, it may be appropriate for a higher proportion of specialist older person housing units to meet Category 3 requirements. (Paragraph 29)

Sharnbrook Housing Needs

Sharnbrook Parish Profile, based on the 2011 Census data, found that household composition in the Parish included:

- One person: pensioner equates to 12.1%
- Couple: both 65+ equates to 12.2%

Therefore, approximately a quarter of households in the Parish of Sharnbrook are formed of either one-person pensioner households or couples with both 65+. This is compared to 11.9% and 8.2% for the Borough.

A Housing Needs Survey for Sharnbrook was completed on behalf of Sharnbrook Parish Council by BRCC (Bedfordshire Rural Communities Charity) in 2011. The survey asked for reasons for why respondents required alternative accommodation. Out of the 27 household's, four indicated that the homeowner needed to move to a smaller more manageable home, but no medical need was identified. Within the responses to the survey a number of respondents highlighted a lack of housing for older people and for the provision of more bungalows and properties for existing residents who wish to downsize and stay in the village. (our emphasis)

This indicates a local need for smaller more manageable homes (such as a two-bedroom bungalow) to enable existing local residents to downsize.

Summary

The Bedford SHMA 2019 has clearly identified a need for older person housing. The population in older age groups in Bedford is projected to increase substantially during the period 2015-35 and therefore, taking into account the existing demographics of Sharnbrook Parish and the responses to the Sharnbrook Housing Needs Survey, the provision of housing for older people in the parish of Sharnbrook would meet a recognised need.

Sharnbrook Neighbourhood Plan

As part of the emerging Local Plan Sharnbrook, following the removal of the new settlement; there would be a requirement to allocate sites for 500 dwellings in Sharnbrook, as a Key Service Centre. The Parish Council will allocate sites for these residential units through the Neighbourhood Plan.

However, on viewing the Parish Council's website, it is noted that the Neighbourhood Plan is currently on hold, while awaiting the new Bedford Borough Local Plan.

Proposed Development

The proposed development would represent infill amongst existing dwellings and would follow a similar layout already found acceptable within the adjacent housing scheme. The layout would also allow for the retention of a hedgerow along Mill Road.

The proposed bungalows would meet the needs of older residents who are seeking to downsize to a more manageable property; therefore, not only would the proposed development provide housing to meet the needs of a growing, aging population, but could also result in the release of family homes by enabling downsizing.

The proposal is for the erection of 10 no. two-bedroom bungalows, with 2 no. parking spaces each unit, together with 5 no. visitor spaces and a new access from Mill Road. Bin collection would be located adjacent to Mill Road.



Proposed Indicative Layout Plan (Drg. No. K1196-03):

Pre-application Advice Request

The purpose of the pre-application submission would be as follows:

1. The principle of redeveloping the subject site for residential (two-bedroom bungalows), particularly in light of the Local Plan Update, and other material considerations;
2. Details of what obligations the Council would be likely to seek for such a development; and
3. Confirmation of other technical information that will be required for the validation of a subsequent planning application.

I look forward to receiving confirmation of the receipt of this pre-application request and potential dates for the pre-application meeting.

Yours sincerely,

[Redacted signature]

[Redacted name]

Planning Director

On behalf of Optimis Consulting Ltd

07415 682 397

[Redacted contact information]

Enc



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Ext : 01234 718068
Email: planning@bedford.gov.uk
Date 13 September 2019

Dear Sir/Madam

PRE - APPLICATION NO : 19/00157/PREAPP
PROPOSAL : DETAILED Officer Meeting and Written: Erection of 10 two bed dwellings

LOCATION : Land Adjacent 81 Mill Road Sharnbrook Bedford Bedfordshire MK44 1NP

Thank you for your enquiry seeking planning advice and our meeting on 5 August 2019 in respect of the proposed development at the above location. I sincerely apologised for the delay in responding to you. Please find below the response to your enquiry.

Site description and proposed development

The pre-application proposes the erection of 10, 2-bedroom dwellings to provide housing for older people with associated access at land adjacent to 81 Mill Road, Sharnbrook. The application site is an agricultural field to the south side of Mill Road. Sharnbrook village is located to the north west of the site. The site is surrounded by open fields and the River Great Ouse to the south and with residential development to the west and east. The land levels fall to the rear of the site, down to the river.

Relevant Site history

None

Relevant Development Plan Policies

Allocations and Designations Local Plan 2013

- AD1 – Sustainable Development Policy
- AD2 – Sustainable Design and Construction
- AD28 – Provision of open space and built facilities
- AD36 – Pedestrian Routes
- AD39 – Cycling
- AD41 – Urban area boundary

Bedford Borough Local Plan 2002

- BE29 - High standard of design
- BE30 - Material considerations
- BE38 - On and Off Site Landscaping
- H26 - Housing in the Open Countryside
- U2 - Flood risk and drainage

NE4 - Trees

Bedford Borough Core Strategy and Rural Issues Plan 2008

CP2 - Sustainable development principles
CP8 - Affordable housing in the borough
CP13 - The countryside and development within it
CP14 - Location of development in the rural policy area
CP15 - Rural key service centres
CP16 - Housing in the rural policy area
CP17 - Affordable housing to meet local needs
CP21 - Designing in quality
CP24 - Landscape protection and enhancement
CP25 - Biodiversity
CP26 - Climate Change and Pollution
CP29 - Accessibility
CP30 - Developer contributions

Supplementary design guidance

'Residential extensions new dwellings and small infill developments' (RENSID) – Design codes N1-N10.
Please note that this is not an exhaustive list of policies, but those most relevant to the development.

Principle of development

The Bedford Core Strategy and Rural Issues Plan 2008 (CSRIP) divides Bedford Borough into the Growth Area (GA) and the Rural Policy Area (RPA). This approach takes account of the different roles and character of the different areas and forms part of the development plan strategy to actively manage patterns of growth, focus significant development in locations that are or can be made sustainable, and make the fullest possible use of public transport, walking and cycling. This approach accords with paragraph 17 of the National Planning Policy Framework (NPPF).

The site is located on the south side of Mill Lane Sharnbrook and is adjacent to an affordable housing scheme to provide for local housing needs which have been recently constructed. The site is located within the rural policy area and is located outside the Settlement Policy Area boundary for Sharnbrook as defined by the Bedford Borough Allocations and Designations Plan Policies Map (2014). The site is therefore defined in planning policy terms as being located in the open countryside. The main shops and services of Sharnbrook are 1.4 km (0.9 miles) away from the site.

Policy H26 restricts residential development in the open countryside to agricultural workers' needs, replacement dwellings and affordable housing only. Policy CP1 states that sustainable levels, locations and forms of development will be sought in accordance with the stated objectives and policies of the plan. Policy CP3 states that the locations for growth will be within the urban area boundary or within the defined limits of Growth Area Key Service Centres. Policy CP13 states that all land outside the Settlement Policy Areas (which applies to this site) is defined as open countryside and that development in the countryside will only be permitted if it would be consistent with national policy. Finally Policy CP14 states that in circumstances where there is a proven need for development to be located in the rural policy area, most new development will be focused in or around the edge of key service centres where employment, housing, services and other facilities can be provided close together. In rural settlements, defined by a Settlement Policy Area boundary, which are not designated as Key Service Centres, such development will be restricted to that which is required to meet local business and community needs and to maintain the vitality of those communities.

In adopted planning policy terms new residential development in the open countryside is not actively encouraged and the proposal would therefore be contrary to local development plan Policies H26, CP1, CP3, CP13 and CP14, which are a suite which has as its objective the requirement to direct development to

the most sustainable locations; as a result the development plan does not support the principle of development in this location.

Setting aside CSRIP Policy CP13 for one moment (which refers to compliance with National Policy) it is important to note that the proposal for the erection of up to 10 market dwellings would not accord with the provisions of saved BBLP Policy H26 or CSRIP Policies CP1, CP3 or CP14 since (owing to the open countryside location of the site) the proposal fails to include any housing exemption as set out within those policies. The proposal would therefore be contrary to those parts of the development plan. However, all of those policies pre-date the publication of the current NPPF and it should be noted that CSRIP Policy CP13 requires decisions on new development in the countryside to be consistent with it. It is therefore necessary for the purpose of informing any application you choose to submit to understand how the aforementioned development plan policies are or are not consistent with national guidance on rural housing (including that which is provided for older people) and to reconcile this position with what is now being proposed within the emerging Local Plan (Bedford Borough Local Plan 2030).

It is acknowledged, however, that the Council's policies precede the publication of the National Planning Policy Framework (NPPF) 2019, which is a material consideration. The Rural Housing section of the NPPF (Paragraphs 77-79) is most relevant to the proposed development and must therefore be given due consideration. Paragraphs 77-78 seek to promote sustainable development in rural areas where proposals would provide affordable housing to meet local needs, and/or would enhance or maintain the vitality of rural communities, and where it would support local services. These paragraphs are seemingly less restrictive than the Council's policies as they indicate that some villages, whether in or adjacent to settlement boundaries or Growth Areas, should be able to grow as long as the development is responsive to local circumstances and where the development will enhance or maintain the vitality of rural communities. Paragraph 79, however, is much more restrictive and seemingly draws a distinction between homes proposed in or close to rural settlements and those more remote.

Specifically, Paragraph 79 states that the development of isolated homes in the countryside should be avoided unless one or more of the closed list of special circumstances applies as follows:

- (a) There is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;
- (b) The development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;
- (c) The development would re-use redundant or disused buildings and enhance its immediate setting;
- (d) The development would involve the subdivision of an existing residential dwelling; or
- (e) The design is of exceptional quality, in that it:
 - is truly outstanding or innovative, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and
 - would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.

There is no definition of isolated in the NPPF but the recent Court of Appeal decision *Braintree District Council v SSCLG* [2018] EWCA Civ 610 has held the term "isolation" simply connotes a dwelling that is physically separate or remote from a settlement because settlements are the preferred location for new housing development in rural areas. However, the judgment added that as settlement is also undefined in the NPPF, whether a proposed new dwelling is, or is not, "isolated" in this sense will be a matter of fact and planning judgment for the decision-maker in the particular circumstances of the case in hand (*Braintree* Paragraphs 29-31).

In this case the subject site is a parcel of land associated with agriculture which lies outside the Settlement limits of Sharnbrook and is bounded to its east and west by residential properties. In that sense the building is not physically isolated from other development. Nonetheless, there are very limited facilities within walking distance and as such residents would be largely dependent on the car to fulfil everyday functions, noting that while there is a bus service which operates through Mill Lane albeit service is infrequent. In that regard, while the proposal is distinctively in the countryside, it is not isolated.

Housing Land Supply

So while the current adopted local plan indicates that development in this location should be resisted, national planning policy indicate that the proposal could potentially contribute to the maintenance of the local rural community. It is also noteworthy that Council's current land supply position (for decision making purposes) is 3.7 years. In fact the current position is actually 3.01 years and in line with Paragraph 11(d) of the NPPF the Council's most important policies for determining housing applications (H26, CP1, CP3, CP13 and CP14) are regarded as out of date.

What this means is that although the aforementioned local policies identify that residential development in this location should be restricted (and indeed it is considered that the proposal is contrary to those policies), the balance at the start of the assessment is tilted in favour of approval (this is referred to as 'the tilted balance') unless the adverse impacts arising from development would significantly and demonstrably outweigh the benefits (i.e. tip the scales the other way) to justify a refusal of planning permission.

However, the 'tilted balance' only lasts whilst the Council does not have a 5 year housing land supply. As the emerging local plan is now at modifications stage and when adopted the Council will have a housing land supply, I would suggest that this is not an argument that you would be able to rely upon as it is likely we will have a supply by the time any planning application is submitted / determined and certainly if an appeal is necessary. I would therefore recommend that your focus going forward is on preparing a robust justification that addresses emerging local plan policy rather than putting forward a 'tilted balance' argument. *(It must be emphasised that this issue was discussed at the meeting on 5 August 2019)*

Notwithstanding the above, a consideration of all the relevant issues surrounding the development of this site is required in order to undertake the balancing exercise.

Effect on the character and appearance of the area

The established pattern of development is linear along the west side of Mill Lane with agricultural fields behind and to the south. There is considerable frontage planting to residential plots on the west side of the road is lined with trees and shrubs through which the agricultural fields can be viewed. This gives the locality a rural village character. The character of the existing development is detached dwellings located within modest plots with front lawn setbacks bounded by hedgerow or paling fences, and rear back gardens backing onto agricultural fields.

The pre-application has provided no elevations which provide details of the scale and design of the dwellings proposed. Therefore, it is not possible to provide comments on the visual appearance of the scheme. In any event, the proposed development would need to be designed to reflect the scale and character of buildings in the local area.

Having regard to layout, the general character of housing along this stretch of Mill Road is houses fronting the street with long rear gardens. The proposal is designed for the properties to front into the access road in a courtyard type layout, which is not typical of the residential layouts nearby, but this approach does reflect the layout recently approved to the adjacent site. I do however feel the development would benefit with dwellings at the site frontage which address and face the road. The properties have adequate space around to provide sufficient garden areas.

Notwithstanding the above, taking into consideration the location of the site and the density of nearby existing development, as things stand a development up to 10 dwellings within the site may not conflict with saved Policy BE37 of the BBLP and the NPPF in this regard.

Impact on neighbours

The closest residential properties to the development site are the dwelling at No. 81 Mill Road and the dwellings currently being built at the adjacent site. As no detailed elevations or plans have been submitted it is not possible to comment on the potential impact the development will have on neighbouring properties. However, any development would need to consider how it will impact on the amenity of neighbouring occupiers including such matters as whether a development is overbearing, whether it results in a loss of daylight/sunlight and whether privacy to neighbours is maintained. For further guidance please refer to design codes N5, N6 and N7 contained in the Council's supplementary design guidance 'Residential extensions, new dwellings and small infill developments 2000 (RENDSID).

Highway safety, access and parking

The proposed road layout would have a 6.0m wide carriageway with 2.0m wide footways on either side and 6.0m radius kerbs which would meet standards although a 4.8m wide carriageway would also be acceptable for a small cul-de-sac. It appears that the extent of the highway adoption would end by Plot 4 whereby 3 or 4 dwellings would be served by a private road which in principle would be acceptable.

The proposed development would generate around 60 vehicle trips per day or around 6 trips in each peak hour. Note that a journey in and out is counted as 2 trips. This additional amount of traffic would result in any significant congestion on the local highway network.

The proposed car parking for residents and visitors would be acceptable in terms of numbers and layout. It also appears that the dimensions of the spaces meet the requirements of the Parking Standard. The Parking Standard requires secure parking provision of 2 secure short-stay cycle parking spaces per dwelling and 1 secure long-stay cycle parking space for each bedroom of each dwelling, up to 4 bedrooms. The short-stay cycle parking could be provided by means of a cycle stand, locking bar or loop to the front of each dwelling and the long-stay cycle parking could be provided within a secure shed to the rear. The 1.5m wide access to the rear alongside each dwelling would be suitable for this purpose. The Parking Standard gives examples of how cycle parking can be achieved.

The Highway Officer has indicated that the required forward visibility of 90m can also be achieved. The proposed junction would be around 42m from the junction to the east which would be acceptable. As the development would have more than 5 dwellings the access road would need to be constructed to an adoptable standard with the developer entering into a Section 38 agreement with the Council with a view to the road becoming adopted. The developer may also have to enter into a Section 278 for the access works onto Mill Road.

Play and open space

The development would meet the threshold (10 dwellings) in ADLP Policy AD28 and therefore the developer would be required to provide on-site informal/amenity green space facilities. I would refer you to the Council's adopted, 'Open Space Supplementary Planning Document 2013'. This can be viewed using the following link:

http://www.bedford.gov.uk/environment_and_planning/planning_town_and_country/planning_policy__its_purpose/open_space_spd.aspx

This sets out the design principles of open spaces, adoption standards requirements and a calculator for open space provision (Appendix 6 of the SPD) which is an interactive spreadsheet available on the Council's website. Appendix 9 of the adopted document outlines the design principles for open space for developers to consider at the outset when providing open space.

Trees/biodiversity

Protecting the environment and enhancing the countryside, biodiversity and geodiversity are all objectives which are set out within CSRIP Policy CP25. I am not aware of the biodiversity potential of the site itself, but

given the existing vegetation and landscaping on and adjacent to the site, the development has the potential to impact on the ecology and biodiversity of the site and surrounding area. Any formal application would need to be submitted with an ecology survey to demonstrate that the site does not contain habitats for protected species, or if they do, any mitigation which would be required to protect them. For further advice relating to the ecological potential of the site you may want to contact the Wildlife Trust or Natural England.

To assess the loss and/or impact of the development on the trees/hedges within and adjacent to the site, any application will need to be accompanied by a tree survey and arboricultural impact assessment and method statement in accordance with BS5837:2012. This should set out in detail all the arboricultural impacts arising from the development, particularly from the creation of a new access, and which in turn will inform the design and layout of the development.

Drainage

BBLP Policy U2 states that the Council will not permit development that compromises the capacity of the floodplain, balancing ponds, drainage pipes, channels and other flood defences. Any formal application would need to be accompanied by a drainage strategy to demonstrate that adequate surface water drainage can be achieved and that the development would not result in an unacceptable increase in flood risk.

Waste and recycling

Again setting aside matters of principle and policy for one moment I can confirm that the Council's Waste Services Team has scrutinised your pre-application enquiry and wishes me to convey to you the following issues.

Bedford Borough Council provides 1 x 240 litres of capacity per bin for recycling and garden waste, and 1 x 180 litres of capacity for rubbish per dwelling. Waste and recycling collections will be completed on an alternate weekly basis, as stated in our waste and recycling operational policy document.

Each dwelling must have space to store the above mentioned three bins within the property boundary with a 1.2 metre wide hardstanding pathway to enable residents to pull their bins out to the highway for collection. Pathways must be hardstanding and as near level as possible, free from obstructions such as parked cars.

Bedford Borough Council's collection crew will not under any circumstances enter a private driveway or a road that is not adopted by Bedford Borough Council. It is not clear whether the access road within the development would be adopted, if it is to remain private a bin collection point at the edge of the adopted highway would be required for at least 2 x 240 wheeled bins per property. If the access road is to be adopted Vehicle tracking for a Bedford Borough Council specification Refuse Collection Vehicle (RCV) must be provided.

As part of a full application annotated and detailed drawings must clearly show what arrangements are to be made for bin storage, collection points and bin collection in any new residential development.

CONCLUSION

The subject site lies outside a settlement policy area of Sharnbrook and is therefore regarded as open countryside for planning policy purposes. The Council's adopted Core Strategy aims to direct new housing to settlement policy areas or to key service centres where housing, services and facilities can be provided close together. The proposal therefore conflicts with those housing policies (H26, CP1, CP3, CP13 and CP14) which are all (except Policy H26) deemed to be broadly consistent with the NPPF Rural Housing Policies in that they seek to direct development to the most sustainable locations.

Notwithstanding the above, the Council cannot demonstrate a 5 year supply of deliverable housing sites and therefore those Core Strategy policies are deemed out of date and should be given limited weight, thus tilting the balance in favour of the development. Furthermore, the site is not isolated per the terms of NPPF Paragraph 79 and the emerging local plan identify the location as a small settlement which can in principle take small scale growth. Notwithstanding the above, it is my opinion that the site is not sustainable location.

As already mentioned in this response, at this stage, a proposal for housing in this location would be contrary to adopted local plan policy and unlikely to be supported in policy terms. However if you are seeking to rely on the lack of 5 Year Housing Supply and the 'tilted balance', you must note that this would only last until the emerging local plan is adopted. As the emerging local plan is now at modifications stage and when adopted the Council will have a housing land supply, I would suggest that this is not an argument that you would be able to rely upon as it is likely we will have a supply by the time any planning application is submitted / determined and certainly if an appeal is necessary. I would therefore recommend that your focus going forward on preparing a robust justification that addresses emerging local plan policy rather than putting forward a 'tilted balance' argument.

Potential validation requirements

With respect to submitting a planning application (if you are minded to do so having regard to the content of this response) I have provided below a link to our website where you can find both the application form you would need and our additional supporting documents list in a pdf document.

<https://www.bedford.gov.uk/planning-and-building/apply-for-planning-permission/planning-application-forms/>

Due to the nature of the site you are also advised that any application you choose to submit would need to be supported by information with regard to trees and hedgerows, ecology and biodiversity and the potential for land contamination (if there are concerns with regard to the past use of the site). You should also consider the submission of flood risk assessment as the southern part of the site is close to area identified in the Proposals Map 2014 as an Area at risk from river flooding. A drainage strategy of the site would also be required. Please also note that based on the information you have provided to date that residential development of the land would be subject to the Council's Community Infrastructure Levy which the Council adopted in April 2014 for most residential developments.

Richard Sakyi

Signed: Planning Services

Date Closed: 13 September 2019

Please Note: If you wish to submit a planning application following this advice please go to www.planningportal.gov.uk for electronic submissions or www.bedford.gov.uk/planningforms to submit in paper (please select the correct form for the proposed development for example a FULL application (material changes of use, non- householder development and erection of dwellings) would be Form 4 and a Householder (without Listed Building consent as well) would be Form 1. Each form has a description of the types of development it relates to).

The response to this pre-application enquiry is based on the information/ plans/ documents submitted. It is not the responsibility of the Local Planning Authority to request additional information in order to answer your enquiry, therefore if you require further advice a new pre-application will need to be submitted and will be charged at the 'follow up advice' fee rate.

Other consents or approvals may also be necessary, particularly under Building Regulations you should check carefully before proceeding with works.

This letter contains advice based on the Council's policies as they were at the time of writing and is written without prejudice to any decision that the Borough Council may make on any subsequent planning application submitted, which will have due regard to all representations received and all other material considerations.

(For Minerals and Waste enquiries the contact details are: Minerals and Waste, Planning Team, shared service with Bedford Borough Council and Central Bedfordshire Council at Priory House, Monks Walk, Chicksands, Shefford, SG17 5TQ Telephone 0300 300 6039)