

AR/3567

Bedford Borough Council
Borough Hall
Cauldwell Street
Bedford
MK42 9AP

14 August 2020

Dear Sir/Madam

BEDFORD BOROUGH COUNCIL - CALL FOR SITES

This covering letter is provided in support of a Call for Sites submission made on behalf of Red Eagle Securities and which seeks the allocation of land off Lovell Road, Oakley (henceforth: the Site) for a development comprising the erection of up to 23 dwellings. It expands on the responses provided on the Call for Sites Form for the site.

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

- Site Location Plan
- Illustrative Sketch Layout Plan
- Infrastructure Technical Note
- Noise Assessment

The Site

The Site, shown edged red on the supporting site location plan, measures approximately 0.49 ha and is located along the north side of Lovell Road outside of the Settlement Policy Area (SPA) for Oakley. The Site projects northwards away from Lovell Road and comprises tended greenfield land used for canine dressage training. The Site is bounded along its western, southern and part of its eastern margin by mature hedgerows and trees, whilst the northern margin gives way to the further tended greenfield land. The site is encompassed entirely by features of existing development; to the east and west is existing residential development, to the south is Lovell road and to the north is the mainline railway. By virtue of these features the Site is contained in an existing cluster of development that exists beyond the Settlement Policy Area. The Site is currently accessible via an existing field access.

Two outline planning applications were previously submitted at the Site seeking permission for a combined residential and commercial development. These applications were withdrawn as the Council indicated they were to be refused. The Council's concerns with the proposals were that the dwellings closest to the railway line would not achieve an acceptable acoustic environment and that the location of the proposals was not sustainable by virtue of being situated beyond the Settlement Policy Area for Oakley. The Council's consultees found the proposals to be acceptable in all other regards however.

The Proposal

The Illustrative Sketch Layout provided in support of this submission demonstrates that the Site is capable of delivering a quantum of up to 23 dwellings, whilst also providing appropriate levels of parking, landscaping and open space in accordance with the Council's guidance. The Infrastructure Technical Note provided with this submission demonstrates that this quantum of development is technically achievable and that there are no apparent technical constraints that would preclude the Site from being acceptable for a residential use.



With regard to the acoustic environment of dwellings closest to the railway line, a detailed Noise Assessment is submitted in support of this submission and demonstrates that an acceptable acoustic environment would be achieved at the dwellings nearest the railway line.

Planning Appraisal

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

The Site is located beyond the Settlement Policy Area for Oakley However, if the Council are to meet the challenging housing target outlined in the LPR then they will need to pragmatically allocate appropriate land in sustainable locations beyond the current Settlement Policy Areas, such as that being advanced here. Furthermore, depending on the speed with which the LPR proceeds, the Council may have to take heed of the outcomes of the White Paper consultation. Specifically, the Council will need to provide sufficient land within 'Growth' areas to meet the elevated housing demand. These 'Growth' areas are inevitably going to be situated beyond existing SPA's due to highly developed nature of the settlements in this area. It is considered that the Site is an appropriate and sustainable location for residential growth regardless of its location beyond the SPA.

The Site is approximately 400m east of the SPA and is contained on all of its boundaries by features of existing development. To the east the Site are instances of existing residential development, beyond the northern margin is the Mainline Railway with open countryside and a public footpath (FP16) beyond it, whilst beyond the southern margin is Lovell Road with open countryside beyond it. To the west of the Site is a residential development that is nearing completion. This development has a substantially urbanising effect and significantly consolidates the appearance of an existing cluster of development in this area. Indeed, by virtue of this arrangement, the Site is contained within a cluster of existing development and thus the context of this area is already synonymous with built form; effectively development at the Site would constitute infilling of a gap in this cluster. This cluster of development benefits from strong physical boundary features in terms of Lovell Road, the Mainline Railway and existing residential development and therefore further development in this area will not appear as alien or incongruent in terms of the surrounding landscape, nor will it represent a built form pattern that is detrimental to the quality of the settlement.

The Site is also sustainably located despite its location beyond the SPA. There is an uninterrupted and illuminated footpath adjacent to the site that provides pedestrian and cycle accessibility into Oakley to the west and Clapham to the east. There are also a number of bus stops in close proximity to the site along Oakley Road and which provide regular services to Bedford and Rushden as well as a number of smaller settlements in between. Oakley itself is sustainable location for new growth and provides a range of services/amenities suitable to support the proposal. Bedford, which is a large settlement and provides a raft of services and amenities, is only a short distance from the Site and is accessible via public transport.

In all other senses the materials provided in support of this submission demonstrate that the Site is eminently capable of delivering the proposed quantum of development whilst also adhering to the Council's standards in terms parking, open space and landscaping. As noted previously, the Noise Assessment provided in support of this submission demonstrates that an acceptable acoustic environment can be achieved at all the dwelling proposed.



The Oakley Neighbourhood Plan (ONP) (adopted 2020) has recently been made. However, it seeks to deliver housing based on the requirement in the adopted Local Plan 2030 and the LPR may well necessitate an update of the ONP if it elects to allocate additional growth in Oakley to meet the elevated housing demand. Policy 4S of the Local Plan 2030 notes that Oakley is appropriate to accommodate 25-50 home, however this could well be revised as part of the LPR in an effort to meet the elevated housing demand. It is the site promoter's opinion that Oakley is indeed appropriate to accommodate a greater level of growth than currently provided for by Policy 4S of the Local Plan 2030 and the applicant intends to submit representations at the Issues and Options Consultation to this effect.

Notwithstanding the above, Policy HG1 contained in the ONP adopts a pragmatic approach to development beyond the Settlement Policy Area. It is considered that development at the Site: would constitute infilling within an existing cluster of housing; would complement the existing housing and not lead to any harmful change to the character of the locality; would result in existing and proposed housing having adequate garden space; and, would avoid the creation of further linear or ribbon development along the roads around the settlement. As discussed previously, the Site is contained within a cluster of development and would represent a logical infilling of this area and would not result in linear/ribbon development. The Illustrative Sketch Layout confirms that appropriate amenity space will be provided at existing and proposed dwellings and it is therefore considered that Policy HG1 supports development at the Site.

Furthermore, Policy HG1 contained in the ONP currently includes allocations for approximately 40 dwellings leaving a residual demand of 10 dwellings. If the recommended levels of growth remain the same for Oakley, the quantum proposed would exceed this residual demand. However, the exceedance is marginal and is not outweighed by the fact that the Site is located in a sustainable location and in area appropriate for new growth. Securing this allocation would ensure that the Oakley delivers its specified level of growth and will assist in fending off speculative applications in less sustainable locations. However, as noted above, it is considered that Oakley is appropriate to accommodate a greater level of growth than is currently being provided and the applicant will be submitting representations to the Issues and Options Consultation to this effect. If a greater level of growth is allocated in Oakley the ONP will have to consider revising policy HG1 to deliver more dwellings than is currently planned for.

Development at the Site will also comply with the remainder of the relevant policies contained in the ONP

Conclusion

In conclusion, the materials provided in support of this submission demonstrate that the Site is technically capable of accommodating the quantum of development proposed. Whilst situated beyond the SPA, the Site has been demonstrated as being located in a sustainable location and within an existing cluster of development. Development at the Site will therefore not appear as alien or incongruent and will contribute towards the Council's objective to deliver sustainable development that induces modal shift. It is also important to reiterate that the ONP supports development beyond the SPA's subject to a number of qualifications. Development at this site would meet these qualifications and therefore the ONP is supportive of development in this location.

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

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

Yours sincerely
For and on behalf of Woods Hardwick Planning LTD

