



Planning Policy Team
Bedford Borough Council
Borough Hall
Cauldwell Street
Bedford
MK42 9AP

Our Ref: 70068851
3 September 2021

Dear Sir/Madam,

**Bedford Borough Council - Local Plan 2040 Draft Plan Consultation
Land off Great Barford High Street, Great Barford, Bedford, MK44 3LF**

We are promoting Land south of the High Street, Great Barford as a deliverable housing site in the Local Plan 2040 Draft Plan consultation, on behalf of 1 Grosvenor Holdings Limited (the freeholders of the site).

These representations split into two sections. The first that responds to the draft policy contained in the Draft Plan, and the second which further promotes the site and assesses the site in light of the Council's site assessment that accompanied the Draft Plan. As such, these representations are structured as follows:

- Response of the Local Plan 2040 draft policy;
 - Housing need; and
 - Growth and spatial strategy options.
- Site promotion;
 - Site and surroundings;
 - Indicative proposal; and
 - Review of call for sites assessment.

RESPONSE TO THE LOCAL PLAN 2040 DRAFT POLICY

CHAPTER 3 - GROWTH AND SPATIAL STRATEGY OPTIONS

HOUSING NEED

The draft Local Plan asks the question:

“How many homes will be needed to be provided across the plan period?”

As outlined in Paragraph 61 of the NPPF, the standard method should be used to calculate future housing requirement and Councils must follow this. Bedford Borough Council (BBC) state a result of the government's recent revisions to the standard method, the housing requirement for BBC is 1,275 dwellings per year, resulting in a total of 25,500 dwellings for the 20-year period from 2020 to

2040. The Draft Plan indicates that is the current starting point for the Local Plan housing requirement.

When considering existing commitments (planning permissions, allocations from current local plans and an allowance for windfall, which together total 13,000 dwellings), based on the standard method requirement figure of 1,275 dpa, the Draft Plan will need to allocate land to provide a minimum of 12,500 new dwellings.

Further detail is set out in the evidence base document Local Housing Needs Assessment (LHNA), this provides evidence the standard method number for the borough has been altered by recent affordability figures and the LHNA was produced in relation to the previous requirement of 1,305 dpa (a total 26,100 dwellings between 2020 and 2040) and this should therefore be considered as the figure for BBC's housing requirement per the stand method as defined in the NPPF.

The annual requirement in the adopted Local Plan 2030 is 970 dwellings per year. The 1,305 required dwellings for this new plan represent a substantial increase to the adopted plan and will therefore result in the requirement to allocate additional sites (such as the land off Great Barford High Street) for housing development.

GROWTH STRATEGY OPTIONS

The Draft Plan outlines four options for the future 'Growth and Spatial Strategy' and asks:

"What, in the context of the vision and objectives outlined earlier in the document, is the appropriate spatial strategy for the plan?"

Option 2d (development in and around the urban area, plus A421 transport corridor with rail-based growth parishes, southern parishes and east parishes, plus one new settlement) represents the optimal and most sustainable option for the borough's growth and spatial strategy.

The Draft Plan outlines that Option 2d will provide between 12,500 and 13,085 dwellings. This is the one only option that provides over the requirement of the standard method and meets the uplift in housing need outlined in the Council's LHNA. This therefore the option that complies with the requirement of Paragraphs 60 and 61 of the NPPF.

Paragraph 60 of the NPPF outlines the Government's objective of significantly boosting the supply of homes. This suggests that Council's should provide above the minimum housing need identified using the standard method **and** local housing need assessments (per Paragraph 61 of the NPPF), a view that was taken by an Inspector in a recent appeal¹ concerning BBC (in April 2021). This reading of the NPPF suggests that it is clear that the upper limits of housing need should be supported and therefore provides justification for the adoption of Option 2d.

The Government's objective for significantly boosting the supply of homes (Paragraph 60 of the NPPF) notes that in order to ensure that this can be supported, a sufficient amount and variety of land should come forward where it is needed. This is emphasised by Paragraph 69 which outlines the contribution that small and medium sized sites can make to meeting the housing requirement of the area, noting that 10% of housing delivery can be undertaken on these sites.

Paragraph 69 therefore supports the progression of Option 2d to be selected as the preferred option for the growth and special strategy of the draft Local Plan. This is as Option 2d while it

¹ APP/K0235/W/20/3263447

provides much needed dwellings in large scale urban extensions and new settlements (which is supported by Paragraph 73 of the NPPF), it accounts for the parishes of Bedford, which are likely to be able to support smaller and medium sized sites with greater ease. Option 2d is therefore supported by both Paragraphs 69 and 73 of the NPPF as it would enable both small and large sites to come forward for development and significantly boost housing delivery.

HOUSING DEVELOPMENT ON SMALL SITES

The Draft Plan correctly recognises the importance of delivering development on small sites and notes the NPPF requirement for 10% of housing delivery coming forward on small sites (per Paragraph 69 of the NPPF).

This is positive and supported, as it will increase the diversity of sites that are developed across the Borough and recognises that larger sites are often difficult to develop and deliver houses much slower than smaller sites.

While it is positive that smaller sites are supported by the plan, it not justified to simply use windfall sites to meet the quota outlined in NPPF Paragraph 69. This is as the nature of windfall sites is uncertain and Paragraph 69 explicitly states that development plans should identify small sites to accommodate the 10% target and as such the current policy approach is not in accordance with the NPPF.

The Draft Plan should be amended to allow for smaller sites to be allocated and enable it to be considered sound in relation to Paragraphs 69 of the NPPF. This is due to Paragraph 35, which outlines that plans need to be consistent with national policy and justified if they are to be considered sound.

CHAPTER 4 – SITE ALLOCATIONS AND CALL FOR SITES

Chapter 4 outlines that the site allocations will be fixed following consultation on the proposed strategy. As such, the above outlines the need to allocate a significant number of varied sites across the Borough. In the next sections of these representations, we outline why the site (Call for Sites ref.1022) should be taken forward for allocation and help to significantly boost the supply of homes, per the Government's objective outlined in Paragraph 60 of the NPPF.

SITE PROMOTION

These representations **support** the allocation of the site (Call for Sites ref.1022) located at the Land South of Great Barford High Street. The following section will promote the site for allocation, outline indicative proposals and review BBC's site assessment proforma.

Site and surroundings

SITE CONTEXT

The site is a greenfield site, circa 1.3ha, and located south of the Great Barford High Street, Bedford.

It comprises open field and is bound by agricultural land to the north-west, west and south and residential development to the north and east, with strong boundaries. The site abuts the Great



Barford settlement boundary. The south of the site lies higher than the north, restricting views out into the countryside when looking south from the High Street.

The site is regarded as unkept grassland, with the site only used by a local farmer to graze stock during grazing season.

There are several listed buildings in proximity to the site; these include four Grade II listed buildings north of site on the High Street (circa 50-170m from the site) and a cluster of six Grade II and one Grade II* listed buildings circa 122m south-east of the site. Additionally, circa 0.25km south-east of the site is the Grade I listed Barford Bridge, which is also a Scheduled Monument.

The northern half of the site is located within the Great Barford Conservation Area and is designated as Village Open Space in the Site Allocations Local Plan and Local Plan 2030. Additionally, a public right of way is located to the west of the site and runs from the north of the site (from the High Street) and continues south-west into the neighbouring land. It appears that the site is rarely accessed by the public.

The site is not subject to any environmental designations, such as Green Belt, Special Areas of Conservation or Sites of Special Scientific Interest. The site is located largely in Flood Zone 1, which is the flood zone most suited to development. Despite this, the site is bound by Flood Zone 2 to the north and a small section of the north-west corner of the site (circa 150sqm) is located in Flood Zone 2. As such this is a relatively unencumbered site.

PLANNING HISTORY

While the site has no significant, recent planning history, there was a refused application submitted in 1988 (LPA Ref: B/TP/88/205). The outline application was submitted for 18 dwellings on the site with housing proposed across the site. The application was dismissed at appeal in October 1988, with the effect on the appearance and character of the village and landscape (owing to the size of the proposal), along with hazards caused by traffic cited as reasons for refusal for both the planning application and appeal.

Since this application was refused, there has been significant additional development within the village of Great Barford, and the character of the village has altered. Owing to this and the smaller scale of the proposed development, there is now a clear need to meet the village's housing requirements.

Indicative proposal

We have previously provided an indicative proposal for the site. This proposal can be found at Appendix 1. These proposals were produced by Steve Ritchie Partnership should be read in conjunction with these representations.

In summary, the proposals include:

- Development at a small scale and density;
- Positioning the dwellings at the south of the site, outside the conservation area; and
- Enhancing the village open space via landscaping.

The indicative proposal has been developed to make best use of the land and contribute towards meeting Bedford Council's housing requirement, while also ensuring that the proposals respond well to the local context, enhance their surrounds and provide for the local community.

The development is proposed to be located in the southern section of the site. The scheme has been laid out as such to ensure that the development is located outside of the conservation area and the area designated as Village Open Space, as to not have an undue impact upon either of these designations.

The low-density proposal is proposed to ensure that development would not have any harmful impact on the setting of the conservation area and high quality, considerate development could in fact enhance the conservation area's settings.

Part of the proposal for development would include a landscaping scheme for the portion of the site that is allocated as village open space. This has been proposed to ensure that the village open space remains for the use of the community. This proposal will enhance the space, meaning that it will bring more value to the community, as currently, the open space is simply unattractive, unlandscaped grass land to be available for us by the community.

Noting that the Council's recent Local Green Space Assessment (2020) concluded that the site (site ref: 202), whilst having a physical connection to the character of the area the site has no known recreational value. This therefore suggests that there is an opportunity to enhance the space via landscaping and open it up for better public use and increase its recreational value - the proposed scheme would enable this investment.

The only function that the site appears to support is a visual break in the High Street, as noted in the Allocations and Designations Local Plan (2013). By ensuring that the development of dwellings is directed to the south of the site, this gap will be maintained. A lower density proposal will also ensure that the impact on the views out of the village and into the countryside will be minimised. Subsequently, a significant gap in-between each dwelling, which will ensure that views into the countryside are maintained, making best use of the available space, when considering the site's setting adjacent to the conservation area and village open space.

Review of 'Call for Sites' site assessment

Following the submission of the site to the August 2020 'Call for Sites' consultation, BBC have assessed the site and published their comments as part of the Local Plan 2040 Draft.

The site off Great Barford High Street was given site ref: 1022. BBC's comments have been reviewed and summarised at Appendix 2. Below we review and in cases rebut the comments made by BBC in the site assessment and conclude that the site should be allocated for housing.

HERITAGE

The site assessment comments that development on the site has the potential to cause harm to heritage assets "*ranging from low to high*". The comments further note that there may be options to avoid, reduce or mitigate this harm and as such, a heritage consultant was commissioned to undertake a site visit and assess the impact that development on the site could have on heritage assets.

The findings of the heritage consultant's assessment can be found at the Heritage Impact Assessment at Appendix 3. This assesses the potential impacts of development at the site on the listed buildings and conservation area in proximity to the site. It addresses the concern of the site assessment that development could range from low to high harm on the heritage assets and concluded that while there could be an impact, when having due regard of the nearby listed

buildings, the scheduled monument and conservation area, and the contribution of the setting of these heritage assets to their significance, in relation to the proposals has found that any harm would likely be low levels of less than substantial harm.

The Impact Assessment also confirms that there are heritage benefits to the scheme and harm can be mitigated through the detailed design of the buildings, the material palette, and the design of new public open space; and the public benefits offered which currently include new housing, a new bus stop, increased public parking and increased biodiversity planting, will also need to be weighed in the planning balance.

It is therefore concluded that the inclusion of the site within the site allocations for residential development would not cause significant harm to heritage significance, nor conflict with heritage policies or Chapter 16 of the NPPF, subject to a sensitively designed and high-quality scheme.

The site assessment grades heritage as “x”, from our assessment we are suggesting that this assessment should be changed to “+”.

ECOLOGICAL

The site assessment comments that development on the site note that it is clear what impact development would have on the site, as such, an ecological review of the site has been commissioned to understand the potential impact of future and suggest mitigation (if appropriate)

The findings of the ecological consultant’s assessment can be found at Appendix 4.

In addition to the above, development on the site has the potential to generate significant biodiversity net-gain opportunities for Great Barford. The indicative proposals per Appendix 1 highlight that the northern portion of the site will not be developed for residential purposes. Instead the indicative proposals outline that this area of grassland will be enhanced, representing a biodiversity net gain and as such, the site’s allocation should be supported, per Paragraph 174(c) of the NPPF, which outlines that net gains for biodiversity should be central to planning policies and decisions.

The site assessment grades impact on protected species as low and suggests that 10% biodiversity net gain as could be achieved, from our assessment we are suggesting that this assessment should be changed to “+”.

AGRICULTURAL LAND

The site assessment notes that the site is considered to be all, or partially, best and most versatile agricultural land. While we recognise that this is the case, the site is scarcely used for an agricultural purpose and due to its partial designation as Village Open Space, is likely to be considered unsuitable for this intensive agricultural use.

The unkept grassland, despite its classification as best and most versatile agricultural land, is therefore unlikely to make a significant contribution towards the provision of agricultural land in the Borough, with other sites providing a higher quality and better located contribution. As such, per footnote 58 of the NPPF the development of the ‘agricultural’ land is justified as this is on an area of poor quality compared to the wider provision in Bedford.

The site assessment grades agricultural land as “x”, from our assessment we are suggesting that this assessment should be changed to “+”.

HIGHWAYS

In terms of highways, the site was considered positively, with the comments noting that the site would not have an issue connected to the highway and noting the accessibility of the site to modes of sustainable travel. The assessment also notes that due to the modest scale of the proposed allocation, there would be no impact of the development on local traffic.

Having regard of the above comments, the site assessment concurs that the proposed allocation is in accordance with Section 9 of the NPPF when considering promoting sustainable transport and highways. This is as Paragraphs 104 and 105 outlines that the planning system (and policies/decisions) should ensure that potential impacts of development be assessed and be managed to ensure sustainable transport modes are promoted. These points are addressed within the site assessment, confirming the site's suitability for allocation from a highways/ transport perspective.

Despite the positive assessment, it is noted that the access may need to be widened, but this can be considered as part of any application or allocation that comes forward to ensure that sufficient access for the site can be created.

The site assessment grades transport as "?", from an in-depth assessment we are suggesting that this assessment should be changed to "+".

SETTLEMENT BOUNDARY

The site assessment notes that the site is located within or adjoining the settlement boundary and adjoins the existing built form. This is correctly recognised as a positive for the site, as it is well-placed to contribute towards the housing need of the village.

The site's relationship to the built form of the settlement makes it a logical place to direct development in Great Barford, per Paragraph 130 of the NPPF. Paragraph 130 outlines that planning policies should ensure that development functions well within its context, sympathetic to the local character and maintains a strong sense of place and community.

The indicative proposal of a small number of dwellings neighbouring the existing built form will ensure that the requirements of Paragraph 130 are met in relation to achieving well designed places.

Summary

These representations have responded to the Local Plan 2040 Draft Plan consultation in two ways. They have taken due consideration of the policy proposed in the Draft Plan and have also responded to comments made by BBC in the site assessment of the site in the 'Call for Sites' site assessment.

In order to support these representations, we have provided:

- Completed application form;
- This planning letter;
- Appendix 1 - Indicative proposals;
- Appendix 2 - Call for Sites Assessment;
- Appendix 3 - Heritage Impact Assessment;
- Appendix 4 - Ecological appraisal; and
- Appendix 5 - Representations for the 2020 Call for Sites consultation.



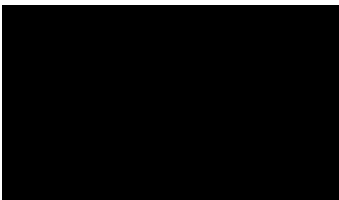
Growth in the borough should be directed per Option 2d in the Draft Plan in order to properly meet the housing requirement of the area and account for the increased need for the parishes of Bedford which will be able to support smaller sites with greater ease.

The site is being promoted as it offers a sustainable and well-placed option to contribute towards BBC's and Great Barford's housing requirement. The allocation of the site would be supported by NPPF, which seeks to bring forward small sites for development to significantly boost housing supply (Paragraphs 60 and 69).

The role of small and medium sites is emphasised in the NPPF (Paragraph 60) and provides justification for allocation smaller sites, like the site South of Great Barford High Street. Allocating smaller sites will allow greater diversity in sites and result in dwellings being provided quicker, rather than over relying on larger sites which often have longer lead in times before dwellings are developed and come with considerable infrastructure and funding implications.

The above therefore highlights that the site is suitable and available for development and should be considered in the next phase of consultation and for allocation in the Draft Plan. This site has the added benefit of a proposal to secure better provision of open space for the benefit of local people.

Yours faithfully,



Associate Director, Planning Consultancy WSP