

1 Grosvenor Holdings Limited

LAND SOUTH OF THE HIGH STREET, GREAT BARFORD

Call for Sites Submission





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PUBLIC

PROJECT NO. 70068851

OUR REF. NO. RPT.001.ZW.70068851

DATE: AUGUST 2020



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QUALITY CONTROL

Issue/revision	First issue
Date	14/08/2020
Prepared by	
Signature	
Checked by	
Signature	
Authorised by	
Signature	SN
Project number	70068851
Report number	Rpt.001.ZW.70068851



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Appendix 1 – Extract from the Environment Agency's Flood Risk Map

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1 INTRODUCTION

- 1.1.1. We are promoting Land south of the High Street, Great Barford as a deliverable housing site in the Call for Sites process of the Local Plan Review, on behalf of 1 Grosvenor Holdings Limited (the freeholders of the site).
- 1.1.2. This submission outlines:
 - The site, its context and planning history;
 - An indicative proposal for the site;
 - The planning policy position;
 - A planning assessment of the site; and
 - A comparative site assessment of potential sites in Great Barford.
- 1.1.3. These representations are supported by:
 - Call for Sites Study produced by Steve Ritchie Partnership;
 - The Call for Sites submission form;
 - Appendix 1 Extract from the Environment Agency's Flood Risk Map; and
 - Appendix 2 Comparative Site Assessment (sourced from AECOM).



2 THE SITE

2.1 SITE CONTEXT

2.1.1. The site is a greenfield site, circa 1.3ha, and located south of the Great Barford High Street, Bedford. An aerial view of the site can be seen below.

Figure 2-1 - Site Plan



- 2.1.2. 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.
- 2.1.3. Currently the site is regarded as unkept grassland, with the site only used by a local farmer to graze stock during grazing season. Recently it has been noted that there has been an increase in the dumping of rubbish on the site. The site needs to maintained and looked after.
- 2.1.4. The south of the site lies higher than the north, restricting views out into the countryside when looking south from the High Street, a photomontage of views from the site can be seen below.



Figure 2-2 - Photomontage of views across the site

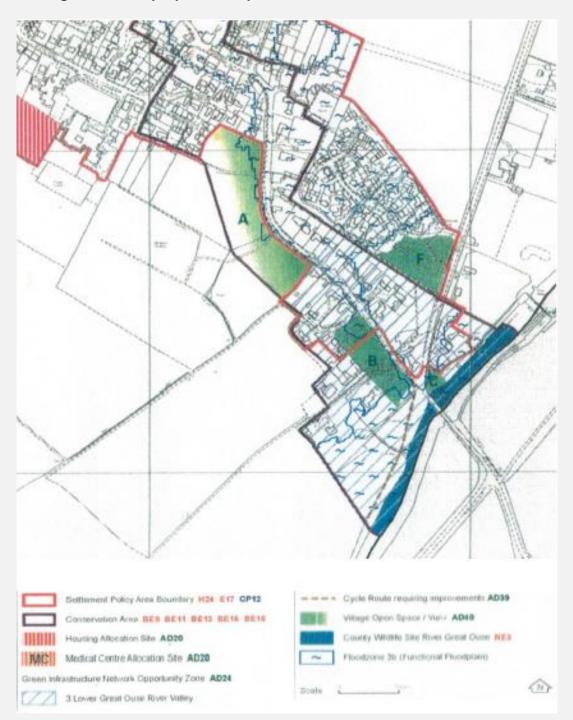




- 2.1.5. There are several listed buildings in proximity to the site; these include four Grade II listed buildings north of site on the High Street (circa 50-170m from the site) and a cluster of six Grade II and one Grade II* listed buildings circa 122m south-east of the site. Additionally, circa 0.25km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



Figure 2-3 - Map extract highlighting designations and allocations, based upon Beford Borough Council's proposals map



2.1.7. 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.



2.2 PLANNING HISTORY

- 2.2.1. 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.
- 2.2.2. 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, circumstances with regards to development in Great Barford have changed since this application was refused and there is now a clear need to meet the village's housing requirements.



3 INDICATIVE PROPOSAL

- 3.1.1. For full details of an indicative proposal for the site, the Call for Sites Study produced by Steve Ritchie Partnership should be read in conjunction with this call for sites submission.
- 3.1.2. 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.
- 3.1.3. The indicative proposal has been development 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.
- 3.1.4. 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.
- 3.1.5. 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.
- 3.1.6. 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.
- 3.1.7. Noting that the Council's recent Local Green Space Assessment (2020) concluded that the site (Site 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.
- 3.1.8. 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.



4 CURRENT POLICY POSITION

4.1 ADOPTED POLICY

4.1.1. Bedford Borough Council's (BBC) adopted Development Plan comprises the Local Plan 2030, which was adopted in January 2020. This establishes the direction of development in the borough. The Development Plan also comprises the Allocations and Designations Local Plan (adopted in July 2013), which allocates sites for development.

LOCAL PLAN 2030

- 4.1.2. The amount of new housing in Great Barford and the rural areas is considered in Policy 4S of the plan. It states that Great Barford will require 500 new dwellings in the plan period. It continues that sites will be allocated in the relevant Neighbourhood Plans (if applicable), but if they are not allocated by January 2021, the BBC will allocate the sites.
- 4.1.3. Despite this the site abuts the Great Barford settlement boundary and therefore falls outside of the Settlement Policy Area, as allocated in the Allocations and Designations Local Plan and therefore is considered countryside. Owing to this, proposals must be in compliance with Policy 7S.
- 4.1.4. As the northern section of the site falls within the Great Barford Conservation Area, Policy 41S is of relevance to development proposals on the site. The policy states that a Heritage Statement or Heritage Impact Assessment would be required to detail the impact proposals would have on the conservation area. The Council states that proposals that affect heritage assets should not lead to the substantial harm of heritage assets and those that lead to less than substantial harm should be weighed against the public benefit of the proposal. Additionally, the policy states that the form, scale layout, design and quality of development will be considered in relation to the heritage asset when considering the approval of development. In recent years there have been several housing schemes approved within the setting of the Great Barford Conservation Area.

ALLOCATIONS AND DESIGNATIONS LOCAL PLAN 2013

- 4.1.5. Policy AD40 designates the site as Village Open Space. This means that development will not be permitted unless it can be demonstrated that the reasons for its designation are not compromised, or that other material considerations outweigh the need to retain the Village Open Space.
- 4.1.6. The site falls outside of the Great Barford settlement boundaries and is therefore designated as countryside.

FIVE YEAR HOUSING LAND SUPPLY

4.1.7. The revised NPPF (2019) was published just before the Local Plan 2030. The revised NPPF provides transitional arrangements for plans in their latter stages of preparation and this means the Local Plan 2030 will be examined against the 2012 NPPF. For this reason, references within the local plan are to the 2012 NPPF. Therefore, due to the changes to national planning policy, in particular the need for the borough to plan for higher housing numbers beyond this local plan, the Council will undertake an early review of the local plan once adopted. It is understood that this Call for Sites will help inform the early review.



- 4.1.8. Policy 1 of the Local Plan commits the Council to undertaking a review of the Local Plan 2030, commencing no later than one year after the adoption of the plan and submitted for examination no later than three years after the Local Plan 2030.
- 4.1.9. Following updates to the calculation of housing requirement between the 2012 and 2019 NPPFs, the standard method (as per the 2019 NPPF) identifies an annual minimum housing need figure for Bedford of around 1,280 dpa, more than 30% higher than the plan's objectively-assessed need of 970 dpa, which follows the provisions of the 2012 NPPF. This means that the Local Plan Review will have to identify a supply of housing land 30% higher than the Local Plan 2030.
- 4.1.10. In the Local Plan Policy 4S there is a requirement for 500 new homes over the plan period in Great Barford, however this does not account for the 2019 NPPF uplift that will be required in the early review.



5 PLANNING ASSESSMENT

5.1.1. This section will assess the planning opportunities and constraints of the site and why it should be considered as a suitable and available housing site in the village of Great Barford.

5.2 SUITABILITY

The Site's suitability is considered in line with the following factors:

- Designations;
- Access:
- Housing;
- Heritage;
- Landscape;
- Flooding; and
- Ecology.

DESIGNATIONS

5.2.1. The site is subject to two designations, these are Village Open Space and the Great Barford Conservation Area. These designations are located to the north of the site. Details of these designations can be found in Figure 3.

Village open space

- 5.2.2. The northern portion of the site is designated as Village Open Space, see the document prepared by SRP. While this means that development is restricted in this northern portion of the site, it presents an opportunity to improve the existing open space, which is un-landscaped and currently is largely grassland and of little to no recreational value.
- 5.2.3. The Open Space Assessment, which supports the Allocations and Designations Local Plan (2013) suggests that the open space was designated in order to provide a gap on the High Street. The impact on the views out of the village and into the countryside are also important.
- 5.2.4. By ensuring that the development of dwellings is directed to the south of the site, the gap will be maintained, and the lower density housing will ensure long distance views to the countryside beyond the site.
- 5.2.5. The proposed housing will not be on the open space and the proposed layout will mean there is better surveillance over the space, which should encourage more use from local people. The layout is such that the houses will fringe the space in a more traditional village green style effect and the parking/layby along the roadside should also encourage usage for those in the village who the space is not walkable. Any application that comes forward will include an enhanced landscape scheme for the open space.

Great Barford Conservation Area

5.2.6. While the Great Barford Conservation Area represents a constraint in terms of development, Policy 41S of the Bedford Local Plan states that development is allowed if it respects heritage assets, including the conservation areas and their settings.



5.2.7. As only the northern portion of the site is located within the conservation area, the southern portion of the site is not located within the conservation area, see Figure 5-1. The proposed housing would preserve the setting of the conservation area using high quality, low density development that responds to its surroundings and the character of the village. The precedent materials and design images shown in the SRP document, supporting this Call for Sites submission, show that the scheme will be of a high quality.

Settlement Boundary

- 5.2.8. While the site is constrained in the sense that it is located outside of the settlement boundary, Policy 7S of the Local Plan states that where development will not negatively impact on the rural landscape, respond to local need, enhance local character and be of a suitable scale, it will be permitted. We note that there are a number of housing sites consider in Great Barford which are further removed from the settlement, and which in terms of their scale and siting, have little relation to the context of the village and would further erode its character.
- 5.2.9. The policy position therefore creates an opportunity for high-quality, low density housing that enhances its surroundings and responds to local character, such as proposed on this site.

ACCESS

- 5.2.10. The site can be accessed via the public right of way that travels through the site, south of the High Street. This track could be upgraded to provide an improved vehicular access to the site with relative ease there is already a vehicular access and dropped kerb.
- 5.2.11. Additionally, the site is relatively well serviced in terms of public transport, with a bus stop being located directly outside the site. This easily accessible form of public transport would allow access to the town of Bedford, and beyond via Bedford train station, without using a car. This therefore represents a sustainable location for housing in terms of transport.
- 5.2.12. The scheme proposed by SRP includes the re-provision of the bus stop, which is currently located on the corner and could be moved away, as part of the proposal to make it safer and draw the stop away from the bend in the road.

HOUSING

- 5.2.13. The site is proposed for four dwellings. This would represent a good use of available land to steadily contribute towards the current housing requirement of 500 dwellings proposed for Great Barford, without significantly impacting upon the surrounding heritage assets or landscape. A small bespoke site would bring variety to the village and provide well designed homes the scale of development would be fitting with a settlement of this scale. Securing the benefit of the open space would also
- 5.2.14. The indicative plans provided by SRP show that the site could comfortably accommodated four detach dwellings, which site wide would represent development at a density of 3dph. If the mix of housing was to change it is feasible to see around 10 new homes on this site. This supply of new homes would make a welcome high quality addition to the village, and would help to meet the need of the area in terms of housing, whilst enhancing open space provision, and without causing significant harm due to overdevelopment.



HERITAGE

- 5.2.15. Considering the distance between the site and these shielding from other buildings in the village there is little invisibility with the listed buildings. Therefore, it is unlikely that future development on the site of the scale proposed would have a significant impact upon the setting of this heritage assets.
- 5.2.16. While there are no heritage assets on the site, as established, the northern portion of the site is located in the Great Barford Conservation Area. It is therefore recognised that development in this part of the site should look to preserve the setting of the conservation area.

LANDSCAPE

- 5.2.17. This is not in an area of landscape sensitivity. Nor is the land classified for any agricultural value on the Government's MAGIC database.
- 5.2.18. The concept plans developed by SRP show that the gap along the frontage of the High Street will maintained as well as the views from the footpath and road through the site to open countryside beyond. Developing the site for housing will not be harmful to the local landscape or that of the village when viewed form the surrounding countryside. The addition of housing will round off the development pattern and extent of the village in a logical way that would not unduly protrude into the countryside.

GREEN END

Compared to the principle of the principle of

Figure 5-2 - Relationship with development pattern of the village

FLOODING

- 5.2.19. The site is largely free from any constraints relating to flooding. As previously mentioned, there is a small section of the site (which borders the High Street) that is located within Flood Zone 2 and the site borders the High Street, which is also located within Flood Zone 2.
- 5.2.20. This small portion of the site located in Flood Zone 2 can be seen in Appendix 1 this only relates to the open space area and not where housing is proposed.



ECOLOGY

5.2.21. There are no known ecological designations present on this site.

5.3 **SUITABILITY**

5.3.1. There is no legal or ownership impediments to development. The land is controlled by 1 Grosvenor Holdings Ltd who has expressed an intention to develop this site.



6 COMPARATIVE SITE ASSESSMENT

- 6.1.1. The below table will assess other sites likely to be promoted through the Call for Sites process and will examine their planning potential, in comparison to the site located to the south of Great Barford High Street. These sites have been lifted from the Great Barford Neighbourhood Plan Site Assessment Support Final Report, prepared by AECOM and dated May 2019. This site was not considered as part of this assessment as it had not formed the Council's SHELAA 2018.
- 6.1.2. Each site is given a tier rating, following methodology used in by the Great Barford Parish Council. Tier 1 sites perform the best in meeting the local criteria, Tier 2 sites perform fairly well in meeting the local criteria but do have some constraints and Tier 3 sites perform poorly in terms of meeting the local criteria.
- 6.1.3. The location of the sites considered as part of this comparative site assessment can be found in **Appendix 2** of this document.

Table 6-1 – Comparative Site Assessment

Site Ref	Capacity	Tier	Comments
123	100	1	No significant constraints.
125	20-30	1	 There is no clear boundary of the development as the site is in the countryside; and There is a moderate potential impact on heritage assets and the site is partially located in the Great Barford Conservation Area.
526	100-120	1	Improvements to access would be required.
605	8-10	1-2	 There is the potential for a moderate impact on heritage assets. Ring ditches and enclosures visible as cropmarks in the east. Bronze Age and middle Iron Age pits and ditches uncovered. Small number of listed buildings within 500m; and The site does not relate well to the existing settlement and would rely on other sites coming forward to improve this.
114	200	2	 Moderate impact on heritage assets as site is adjacent to the Great Barford Conservation Area; The site does not relate well to the existing settlement and would rely on other sites coming forward to improve this; and Poorly to moderately located in relation to key services and transportation.
116	220	2	The site projects into the countryside;



			 The site is located within 300m of the Bridge Farm Strategic mineral site; and Access is not suitable as left hand visibility splay cannot be achieved.
118	104	2	 Moderate impact on heritage assets, including the setting of the Barford Bridge Scheduled Monument and several listed buildings; and The site is within 300m of a mineral safeguarding area.
127	70	2	There is no clear boundary of the development as the site is in the countryside.
128	240	2	 There could be a moderate impact on heritage assets, as there are assets within 100m of the site; There is no clear boundary to the north of the site and it projects out into the countryside;
129	10	2	 There could be a moderate impact on heritage assets, as there are assets within 100m of the site and the site is adjacent to the Great Barford Conservation Area; The site is in open countryside; and The site is located within 300m of a strategic mineral site and is within a mineral safeguarding area.
535	300-350	2	 Potential for flood risk as some of the site is in areas with high and medium risk of surface water flooding (1 in 30 year); There could be a moderate impact on heritage assets, as it is located in an area of prehistoric activity; The site does not relate well to the existing settlement and would rely on other sites coming forward to improve this; and Improvements to access would be required.
670	210	2	 Potential for flood risk as some of the site is in areas with high and medium risk of surface water flooding (1 in 30 year); Potential for moderate risk to heritage assets, including cropmarks of Roman/ prehistoric enclosures and ring ditches on the site. The site is known for its Iron Age occupation and to be part of the medieval settlement of Green End; On further heritage grounds, the site is adjacent to the conservation area, with several listed buildings in proximity, including the Howbury Ringwork scheduled monument; The site is within 300m of bridge farm mineral site for sand and gravel extraction, adjacent to a mineral safeguarding area and within 300m of the Dairy Farm mineral extraction site; and Improvements to access would be required.



495	350	3	 The site would have many impacts on key views of All Saints Church and the Great Barford Bridge; Potential for flood risk as some of the site is in areas with high risk of surface water flooding (1 in 30 year); Moderate impact on heritage assets, as the site is a known area of extensive prehistoric activity, listed buildings and in the vicinity of the Great Barford Conservation Area and the Barford Bridge Scheduled Monument; and The south of the site is within 300m of a mineral safeguarding area; Improvements to access would be required.
532	500	3	 The site has a small area of land that is at high risk of surface water flooding (1 in 30 years); The site could have moderate impact on heritage assets. Mid-Saxon remains and prehistoric cropmark enclosures on site. Additionally, there may be some important hedgerows present; Potential impact on setting of scheduled monuments at Birchfield Farm and Palace Yard, the Conservation area and a number of listed buildings within the vicinity; and There is no clear boundary to the north of the site, and it projects out into the countryside.
603	350	3	 Potential for flood risk as some of the site is in areas with high risk of surface water flooding (1 in 30 year); There is the potential for a moderate impact on heritage assets, as the site is located in an area of prehistoric activity and is within the vicinity of the conservation area. Additionally, there are a number of listed buildings in proximity to the site and the potential for an impact on the setting of the Barford Bridge scheduled monument; The south of the site is within 300m of a mineral safeguarding area; and Improvements to access would be required.

6.1.3.1 In conclusion the site assessment for Great Barford found that:

- Tier 1 (perform the best in meeting the local criteria) = 250 homes
- Tier 2 (perform fairly well in meeting the local criteria but do have some constraints) = 1,412 homes
- Tier 3 (perform poorly in terms of meeting the local criteria) = 1,200 homes
- 6.1.4. Tier 3 sites can be disregarded. Of the Tier 2 sites, sites no. 535 and 670 (for collectively 1,060 new homes) are in an area of high flood risk (1:30yr) and sites no. 118 and 129 (collectively for 114 new homes) would also affect the mineral safeguarding area neither of these constraints are surmountable. Discounting these sites alone would leave 238 homes categorised as Tier 2 sites the remainder of this sites aren't without significant restriction and do not perform as well as the site proposed by 1 Grosvenor Holdings Limited.



7 CONCLUSION

- 7.1.1. This report looks to promote Land south of the High Street, Great Barford for housing.
- 7.1.2. The Call for Sites Study, prepared by SRP, submitted alongside this report, highlights that the allocation of this site could positively react to the local character and context of Great Barford, enhancing its surrounding while contributing much required housing and community space for residents of Great Barford.
- 7.1.3. It is clear from the site's previously promoted in Great Barford that there are not sufficient good quality housing sites that meet the required criteria. The comparative assessment shows that it is not possible for the Council (via the Neighbourhood Plan) to meet the 500 new homes target for the village, let alone additional housing need that is going to need to be accommodated with the early review.
- 7.1.4. The site, Land south of the High Street, Great Barford, is suitable and available for development and should be considered in the next phase of consultation and for allocation in the Local Plan Review. This site has the added benefit of a proposal to secure better provision of open space for the benefit of local people.



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