

**Introduction**

Following a Parish Council meeting on 24<sup>th</sup> August 2017, this document has been prepared to provide formal feedback response on submitted potential sites for residential development in Gravenhurst. The comments should be read in their entirety and because of the small size of Gravenhurst, they encompass all 3 sites put forward for further consideration by Central Bedfordshire Council. In formulating this response we have made reference to the following information and documents:

- *The strategic points within the assessment protocol used to measure the sites*
- *The National Planning Framework 2012 (NPPF)*
- *The current Central Bedfordshire Local Development Framework (LDF) 2009: Core Strategy & Development Management Policies (CSDMP).*
- *The Central Bedfordshire Local Plan Draft consultation July 2017*

**1 – List of sites allocated in Gravenhurst for further consideration**

Reference no	Site name	Number of proposed dwellings	Submitted developable area size
ALP243	Land at Barton Road	18 (by agent/owner) 36 (using CBC methodology)	0.6ha
ALP467	The Pyghtle	Not specified (by agent/owner) 28 (using CBC methodology)	1.2ha
NLP101	Land at Upper Gravenhurst	45 (by agent/owner) 36 (using CBC methodology)	1.5ha



# GRAVENHURST

## Parish Council

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Document from: Councillor & Chair-person: Natalie Lockey

11 Barton Road  
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25<sup>th</sup> August 2017

For the attention of "Local Plan"

Dear Sir or Madam

**RE: CONSULTATION FEEDBACK FROM GRAVENHURST PARISH COUNCIL**

**SITES IDENTIFIED IN THE VILLAGE FROM THE CALL FOR SITES PRELIMINARY ASSESSMENT**

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## 2. Development on Greenfield land

- *Sites suitability (point 16 of assessment criteria) and agricultural land quality (point 24 of assessment criteria)*

We note that the respective sites are Greenfield land as opposed to previously developed land (according to the National Planning Policy Framework definition) and hence points 16 and 24 have red flag warnings. The development would impact on high quality grade 2 agricultural land and conflict with policy DC6 within the Central Bedfordshire Draft Plan Consultation 2017:

### *Policy DC6:*

*Agricultural land other than for land that has been allocated within this Local Plan or previous development plans, development that would result in the significant loss of Grades 1, 2 and 3a agricultural land will not be permitted unless;*

- *Significant sustainability considerations which override the need to protect the land can be demonstrated; and*
- *There are no suitable alternative sites which are available for the proposed development. When considering the significance of the loss; the grade of the land, the size of the proposed site and the quantum of 'best and most versatile' land in the area will be taken into account.*

In addition the National Planning Policy Framework (NPPF) encourages the use of previously developed land (brownfield), rather than such Greenfield land. We do not consider the development sites in Gravenhurst, a small defined village (not a service centre) as per the Council's Settlement Hierarchy Audit in the existing and draft plan, merits a material consideration mitigating this hindrance.

## 3. Impact of cumulative development on the village

- *Cumulative impact (point 21 of assessment criteria)*

The assessment suggests in the comments that housing growth in the village is calculated at 1.65% based on outstanding planning permissions as at April 2016 versus the number of dwellings in the village. This data appears to be incorrect. However, the grading given is (A) at 5% to 20% growth which highlights an error in the document. Although we appreciate that a cut-off

date must be provided for the purposes of preparing site assessment criteria across Central Beds, in a village as small as Gravenhurst a minor development after the date could seriously impact on the sustainability of the village because of its very limited facilities. We would therefore expect discretion and understanding when considering allocation sites. We make reference to the following which do not appear to have been considered:

**CB/15/04081/OUT:** On 30/03/2016 the Development Management Committee resolved to grant planning permission for the development of 24 houses under planning reference CB/15/04081/OUT (land rear of Barton Road). However the S106 planning agreement was not signed until 28-12-2016. Irrespective of the later S106 date, we would expect this planning permission to be automatically included within the cumulative impact figure for such a small village for such major decision making.

**CB/17/00106/OUT:** On 26-04-2017 the Development Management Committee resolved to grant planning permission for the development of 10 dwellings under planning reference CB/17/00106/OUT (Orchard Close).

Taking into consideration the above applications, the up to date impact of cumulative growth is therefore:

No of houses 2016:	243
Outstanding completions:	4
Further outstanding completions highlighted:	34
Total:	38
<u>% growth</u>	<u>16%</u>

Although 16% is deemed amber and under the red warning flag deemed at 20% of growth, taking into consideration the minimal quantities/ sample of data and clearly lacking existing infrastructure in the village, the Parish council is anxious to show the reality on the ground through a much more careful and detailed microscopic assessment after the initial generic desktop assessment. By omitting a small development from figures because of a date, the implications are greater than for a larger village or town and we risk sleep walking into further unsustainability.

**4. Impact of the proposed site allocations on the village and how they would interact with the existing character, type and location of existing dwellings**

• **Landscape character of village (Point 36 of assessment criteria)**

Each of the sites is marked as amber because of limited opportunity for development on the sites

ALP243 (land at Barton Road) states "Very limited scope for development would need to be small scale – site is part of rural setting characterised by small fields and hedged boundaries. Need to conserve hedgerows".

ALP467 (The Pyghtle) states "Limited opportunity for development of site; elevated location within distinctive settlement set on knoll. Need to conserve rural setting / views. Need to include PROW within appropriate landscape setting. Any development must respect views to settlement and church tower via layout, build height and appropriate landscape mitigation. Recommend any development must provide appropriate and effective landscape mitigation to southern site area especially and include PROW within landscape".

NP101 (land at Upper Gravenhurst) states "Limited opportunity for development of site; elevated location within distinctive settlement set on knoll. Need to conserve rural setting / views. Need to include PROW within appropriate landscape setting. Any development must respect views to settlement and church tower via layout, build height and appropriate landscape mitigation. Recommend any development must provide appropriate and effective landscape mitigation to southern site area especially and include PROW within landscape setting as part of public realm".

All of the sites have issues and as the purpose of the site allocations is to provide deliverable sites offering maximum efficiency to help with housing supply, the Parish Council would argue that as each is described as having limited opportunity for development, this arguably should be a red flag, not amber.

Policy DM3 of the CSDMP concerns high quality development and that housing should be appropriate in scale and design to their setting.

The current approximate data for property per hectare in Gravenhurst, is 16. Any attempt at reducing this figure would mean development sites would not be in scale and design relative to the village. The current policy of Central Beds

in relation to level of density for new development is nearly double this figure at 30 dwellings per hectare. In addition the majority of the village is linear in design, which does not lend itself to modern housing development of a higher density.

Because of the limited development in the village, the allocation would also risk any development being over-bearing, out of scale, and giving impression of a modern housing estate shunted next to an existing village which has grown organically over many years. This conflicts with strategic objective 10 from the CSDMP plan:

*"To ensure development respects and contributes to the districts diverse local character". The consequence of non-delivery in this respect are that "The Character of District is adversely affected by unsympathetic development"*

*The development conflicts with Policy DM4 of the CSDMP which states:*

*"All proposals for new development including extensions will be appropriate in scale and design to their setting and respect the amenity of surrounding properties".*

Although at this stage, this is merely a proposed site allocation, in order to be financially viable the sites would need to be built at a higher density closer to 30 dwellings per hectare. This would immediately impact on the rural nature of the village and cause overspill. Therefore special attention should be paid to the financial viability of any development and the temptation to build more dwellings which will impact on the local character of Gravenhurst. It could be argued sites in less rural areas could cope with a higher density and hence allocations elsewhere are more suitable. The new draft plan suggests that lower densities might be appropriate to take into account of the existing character of an area, but this in itself impacts on financial viability. Such sites are less suitable in relation to meeting housing demand targets.

**5. Gravenhurst Transport and Access to Services**

• **The suitability and sustainability of sites for housing – The councils settlement hierarchy audit (Point 25 of assessment criteria)**

The hierarchy of settlements concerns a list of locations where development could take place based on local facilities available, such as access to schools, shops, public transport etc. Gravenhurst has lost existing infrastructure such as the Public House, shop and church. Large scale development in small

villages (in relation to their existing size, not just referring to the number of dwellings) would not normally be permitted within the current development plan. In addition the draft plan at policy SP6 states:

**Policy SP6:**

*Development within Settlement Envelopes: Settlement Envelopes provide a distinction between settlements and the countryside. Within Settlement Envelopes of large Villages, small-scale housing and employment uses, together with new retail, service, and community facilities to serve the village and its catchment will be supported in principle. Within Settlement Envelopes of Small Villages, development will be limited to Infill development, small-scale employment uses, and community facilities.*

The proposed sites are not for employment use, neither are they proposed community facilities. It is also argued that they are not currently infill development because they are outside the current settlement envelopes. We appreciate these envelopes are being reviewed but as it stands this remains the case. The lack of existing infrastructure discussed further on, even for an infill development would also suggest that such allocations would be illogical and counterproductive.

- **Primary/lower School (Point 25a)/lower school capacity (point 30 of assessment criteria) and commitment to address (point 31 of assessment criteria)**

The existing school has capacity for only 45 pupils (aged 4 to 9) (as per the Department for Education). It is currently running at high capacity and supports children from other villages. The future and cumulative impact of the 24 houses granted permission in Barton Road under CB/15/04081/OUT will cause further material issues in respect of this problem. The allocation of further land for residential development would result in a situation where a considerable number of children aged 5 to 9 and hence too young to travel alone outside the village on a bus, will be forced to travel outside their village with supervision using poor public transport, or in reality the parent or guardian requiring a car. This is not sustainable development and does not support creating a strong local community. The size of the potential residential development sites although large in relation to Gravenhurst, are not large in terms of developing further school provision. Hence any proposal would not be financially viable and just present further insurmountable issues further down the line. This is a fundamental issue which the Parish Council do not believe can be overcome. Schooling is a fundamental building block of

infrastructure and therefore a material consideration which has not been answered. We also note that with reference to point 31, no provision to address this has been stated on any site allocation. This has only been marked as an amber risk level. For such a small village with already school at near full capacity which is unlikely to be able to demonstrate finance viability for increased capacity from the size of the allocated sites, Gravenhurst PC believe this should be a red warning NOT amber.

- **Middle School (point 25b of assessment criteria)/ Upper School (point 25c of assessment criteria)**

Robert Bloomfield middle school is approximately 5 miles away and Samuel Whitbread Academy is approximately 7.5 miles away. Although a bus service operates for children in the village, further residential site provision would increase car use for parents for to and return trips. This is not sustainable development and arguably other sites with more appropriate access could be allocated.

- **GP's Surgery/medical centre (Point 25d of assessment criteria)**

The nearest medical facilities are in Shefford which is approximately 5 miles away. Hence car reliance is heavy in the absence of good public transport as detailed further on. This is not sustainable development which is correctly highlighted as a red flag barrier on the Central Bedfordshire assessment. This is a material consideration which should prevent such site allocation for development.

- **Retail provision (point 26 of assessment criteria)**

The nearest retail provision is in Shefford which is approximately 5 miles away. Hence car reliance is heavy in the absence of good public transport as detailed further on. This is not sustainable development which is correctly highlighted as a red flag barrier on the Central Bedfordshire assessment. This is a material consideration which should prevent such site allocation for development.

- **Bus service (point 27 of assessment criteria)**

In Gravenhurst public transport provision is extremely limited and recently C8C bus funding has been withdrawn worsening the situation. The assessment is very light touch and does not consider this in enough detail. It merely suggests a regular route to Biggleswade exists. Those without vehicles especially the

elderly, are reduced to being reliant on neighbours and a charitable organisation in the village. This is not sustainable development.

Point 4.1.8 of the CSDMP makes this point "Ensuring good accessibility to facilities in the district is therefore a key issue. A particular problem exists for those without access to a car. This potentially results in deprivation and exclusion for sectors of the community such as the elderly and young". Policy CSA of the CSDMP concerns Linking Communities – Accessibility and Transport. At point 4.5.1 it explains that "poor transport limits opportunities to access employment as well as services and facilities".

- **Distance to train station (point 28)**

Concerning a railway service, Flitwick railway station is 6.4 miles away. In addition a very limited bus service exists meaning it is completely unrealistic if for example, somebody wanted to travel to Bedford, Luton or further afield for work purposes using the train by using only public transport. A one way taxi to Flitwick is in the region of £20.00 which is clearly not a sustainable cost to most residents of the village on a regular basis. We agree that the railway provision has correctly been highlighted as a red flag for development in the assessment and is a material issue in respect of site allocation.

Decent public transport provision is a key requirement contained in the NPPF, specifically chapter 4 – "promoting Sustainable Transport" which Gravenhurst cannot demonstrate.

➤ **Paragraph 29:** "Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel"

➤ **Paragraph 30:** Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.

Policy 2.2 of the draft plan concerns "Connectivity and achieving Sustainable Growth and Communities". Under sustainable transport it explains the challenge and the opportunity/solution:

**Challenge:** Slow and deficient public transport access between key centres resulting in high dependency on private vehicles and low proportion of trips made by cycling, walking and public transport.

**Solution:** More concentrated growth located close to key transport routes with 'walkable neighbourhoods' could make sustainable transport more viable.

The PC would argue that to allocate development sites in Gravenhurst is not sensible, the village is not close to key transport routes and certainly cannot demonstrate a 'walkable neighbourhood'.

Under policy 2.4 Market Towns and villages – local economy and services (Rural Services) it states:

**Challenge:** "The lack of accessible key services in rural locations and an over reliance on car travel".

**Solution:** This is stated as "Some incremental growth in villages could sustain existing services and enable new ones; new public transport routes enabled by strategic development may also be used by existing communities"

The PC would argue that these sites will neither encourage better public transport nor sustain existing services (they do not exist).

## **6. Conclusion - Infrastructure and sustainability of Upper Gravenhurst as a location for residential site allocation**

The PC believe that the site allocations are not proportionate or appropriate to the size and location of the village. The allocation of such sites even at a total of only 23 houses combined would result in an increase in village size of 25%, when considering current permissions already granted. The allocation of such sites would reinforce a continued disregard for the importance of strong infrastructure to accompany residential development and be at odds with what the draft plan is appearing to manage. It is unacceptable for housing to be added piecemeal in small chunks, with the infrastructure falling further and further behind. This risks sleepwalking into creating a community where there is little community spirit, opportunities to mix, poor access to employment and resulting deprivation. The adverse impact both now and when combined with the precedent set for further

development would be far reaching, and we believe overrides the need for housing in Gravenhurst which could be placed in more sustainable areas highlighted in the process.

The CSDMP at 3.23.2 (Vision) states "development should only take place where it has the clear potential to support and retain existing local facilities, will bring forward important new services or community infrastructure.

The CSDMP at policy CS2 also explains that "contributions will be expected from any development which would individually or cumulatively necessitate additional or improved infrastructure, or exacerbate an existing deficiency".

Policy HQ2 (provision for social and community infrastructure) of the draft plan explains "New housing developments will be required to contribute towards the provision of social and community infrastructure to meet the need generated by the development. Where an application fails to provide adequate social and community infrastructure without reasoned justification, or fails to make appropriate planning obligation contributions, it will be refused".

We would suggest that the deficiency argument would be strongest in this case. The site allocations are large in number in comparison to the village size, but it will generate insufficient infrastructure improvements to the village.

The Government's NPPF at paragraph 7 also explains that sustainable development should "be a high quality built environment, with accessible local services that reflect the community's needs and supports its health, social and cultural well-being".

Although we appreciate each site and any planning application is judged on its merits we think a recent application judgement is highly appropriate when considering site allocations. A Central Beds Principal Planning Officer in pre planning advice to the applicant for application CB/17/1360/OUT (52 houses at Orchard Close, refused on 13-07-17) stated:

*"Proposals have to be considered in light of the presumption in favour of sustainable development. It is my view that Upper Gravenhurst is, at best, questionable in terms of it being a sustainable settlement. The village offers little in the way of infrastructure to support growth and consent is imminently to be issued at an adjacent site for up to 24 dwellings which*

means growth has already permitted in an area that realistically cannot accommodate any significant numbers.

Gravenhurst Parish Council wholeheartedly agree with a comment made by Central Beds Council in the draft local plan which is highly appropriate - "Small developments in and around villages will only happen where this can be supported by existing services or where the development will enhance these services and there is good accessibility".

We also note that all of the sites suggested have development issues resulting in a likely reduction in site optimism for the number of dwellings. They also highlight potential detrimental impacts on the local landscape character. As the purpose of the site allocations is to provide deliverable realistic sites offering maximum efficiency to help with housing supply, the Parish Council would argue that as each is described as having limited opportunity for development, more detailed assessment shows them as having restraints to development. It would appear fanciful to pursue sites in a rural areas without sufficient infrastructure that are not as deliverable or as commercially attractive (in respect of local infrastructure to enhance the likelihood of new build sales) as sites in more developed non rural areas.

**For the reasons stated above, the Parish Council does not support the site allocations proposed in their current format.**

Yours Faithfully,

Parish Councillor Ms Natalie Lockey (Chair-person)