



Flitwick Town Council

Report to Town Council on 21st June 2022: Land south of Church Road

Implications of recommendations

Corporate Strategy: There are no direct implications from this report

Finance: There are no direct financial implications from this report.

Equality: No equalities implications have been identified from what is discussed in this report.

Environment: There are no direct environmental implications arising from this report.

Recommendations

That the Council objects to the application for the Land south of Church Road on the following grounds:

- That the development is situated in green belt, which is contrary to Policy SP4 of the Local Plan. Additionally, no exceptional circumstances have been demonstrated by the developer that justifies development on the Green Belt;
- No satisfactory assessment has been undertaken of the development's impact on the Flitwick Manor County Wildlife Site, specifically the impact on the floodplain marshy grassland and swamp National Priority Habitat, making this development contrary to Policy EE3 of the Local Plan;
- No plans have been identified for how the scheme will make a contribution to the Greensand Ridge Nature Improvement Area through enhancing access to and the experience of the NIA in a way that is sympathetic and sustainable towards existing habitats, making it contrary to Policy EE8 of the Local Plan;
- The development is likely to have a significant visual impact on the Greensand Ridge Nature Improvement Area, making the development contrary to Policy EE8;
- No assessment has been undertaken of the impact of the development on local healthcare facilities, nor have appropriate mitigation measures been recommended;
- Significant concerns over the impact of the development on flooding of the River Flit and associated wetland habitats in Manor Park, potentially making this development contrary to Local Plan Policy CC3.

Additionally, the Planning Improvement Working Group (PIWG) has identified a number of areas of concern about the development, which it is recommended that the Council raises in its response to CBC:

- The Transport Assessment raises the issue of speeding traffic on Church Road approaching the site entrance from both directions. Yet no mitigation measures are proposed to reduce vehicle speeds approaching the site entrance from the West along Church Road, potentially raising a significant road safety issue for approaching vehicles;

- The proposed pedestrian link to the footpath at the junction of Temple Way and Church Road would require any pedestrians using it to cross roads 3 times to continue on a footpath that is on the same side of Church Road as the site;
- Concern that the scale of and quantity of development is detrimental to the historical character of the Grade II Listed Flitwick Manor Park, with the heritage assessment seemingly to primarily focus on views from the parkland as opposed to the wood;
- Concerned at the lack of detail on sewage outflow from the site, with the main sewage facility being some way from the primary sewer main and in a location that could impact on the wetland habitat of Flitwick Manor Park;
- The site is located on agricultural land that is identified as Good to Moderate in quality, and therefore we are concerned about the loss of agricultural land;
- A general concern about the quantity of development that is being proposed on greenfield sites in Flitwick, and the ability of the key services and infrastructure in Flitwick to be able to effectively facilitate this planned and unplanned growth that will affect the town.

Background

The PIWG has been tasked with the consideration of, and making recommendations to, Town Council concerning major planning applications. As well as such planning applications within Flitwick, this also considers major applications that are likely to have an impact on the town.

This report concerns the planning application for the development of the site informally known as 'Church Road,' but formally known Land south of Church Road, Flitwick. The Planning Improvement Group has reviewed this application in line with the adopted Planning Guide.

Councillors can view the application documents online on the [Central Beds Planning Portal](#), citing planning application reference CB/22/01575/OUT.

This application has generated significant local interest from the residents of Flitwick. The PIWG has noted the matters raised by local residents in its deliberations, but in line with the Planning Guide has reviewed and determined its view on the application based on the applications own merits.

The proposals

The planned development is for a mixture of retirement accommodation to the south of Church Road, on the edge of Flitwick adjacent to Flitwick Manor Park. The description of the planning application is as so:

Development of a 162-unit Integrated Retirement Community (IRC) providing Extra Care housing (Class C2) including 30% affordable housing in the form of 29 bungalows and 20 apartments and a 66-bed Care Home with ancillary community and service space, garden and leisure areas, car parking, circulation space, internal access ways, principal access, and ancillary landscaping. Access only, all other matters reserved.

It should be noted that this is an Outline Application, focussing on access only. Consequently, this application is about establishing the principle of the development on the site, and the details of the access arrangements. Detailed matters, such as the design of buildings, will be considered later through Reserved Matters applications.

The layout plan, which also gives an indication of the sites location, is shown below.



Figure 1 - Overview map

Matters for consideration

The PIWG focussed its discussions and consideration of the development on several key issues identified through the planning application documents, and through its own knowledge of the site and its surroundings. These discussions are summarised as follows.

Principle of development and the Green Belt

The application site is located on land that is part of the South Bedfordshire Green Belt, as identified in [the Central Bedfordshire Local Plan](#). Policy SP4 – Development in the Green Belt is particularly relevant in this regarding, stating that...

The Council will work proactively with developers, and landowners to enhance the beneficial uses of the Green Belt.

Within the Green Belt there is a general presumption against inappropriate development. Development proposals within the Green Belt will be assessed in accordance with government guidance contained in the NPPF and NPPG.

Within this Plan’s washed-over Green Belt settlements, applicants will be expected to pay particular attention to the quality and design of development proposed, to ensure that development respects and is sympathetic to the character and openness of the settlement and its surroundings.

The redevelopment of brownfield sites within the Green Belt will be acceptable as long as the redevelopment would not have a greater impact on the openness of the Green Belt or the purposes for including land within the Green Belt than the existing development.

The National Planning Policy Framework generally advises against harmful development in the green belt unless ‘very special circumstances’ can be demonstrated. The applicant argues in its

submission that the type of development that it is proposing (specialist retirement living accommodation) is not adequately catered for in the Local Plan and in future proposals for care homes in the area. The applicant notes that the current Local Plan approach is to provide bungalow accommodation as part of all major developments as elderly living accommodation, and argues that this is insufficient on its own to deliver the extra capacity for the type of accommodation that they are proposing. Combined with an increasingly elderly population, this constitutes very special circumstances, and so is permissible under the NPPF.

The PIWG noted the Older Persons Housing Need Assessment provided alongside the application. This document is primarily a review of various research papers on the need for elderly person accommodation, a review of some local housing market indicators, a critique of Central Bedfordshire Strategic Housing Needs Assessment, and a review of appeal decisions considered relevant to the application site. Whilst a comprehensive document, it is the view of the PIWG that the document does not demonstrate very special circumstances. Specifically, it does not identify a quantum of unmet demand for this type of facility in Central Bedfordshire. Furthermore, the Strategic Housing Needs Assessment work of CBC for the Local Plan has been suitable enough to warrant the adoption of the Local Plan.

As a consequence of this, the applicant – in the view of the PIWG – has not provided a demonstrable reason for permitting this development in line with established Green Belt policy. Therefore, the principle of the development has not been established.

Impact on landscape, ecology, and Flitwick Manor Park

The applicant provided a number of technical assessments to support the application that are relevant to the landscape, ecology, and setting of the site, specifically in relation to the Grade II Listed Flitwick Manor Park. The PIWG has reviewed this documentation, which has primarily focussed on the site itself. The most notable findings of these assessments and plans are as follows:

- The site is currently a field for arable farming, that the applicants documentation considers to be of a relatively poor quality with low agricultural value;
- Ecological surveys have identified trees and other ecology that are suitable for nesting birds and bats, both of which have been observed on the site;
- There is a recognition of the presence of Flitwick Manor Park both as a Grade II Listed Park and County Wildlife Site, and that the development is likely to have a small impact on the site;
- That the development accords with the intention and specifics of policies to minimise the impact of developments on sensitive landscapes, through a mixture of the use of topography to limit the visual impact of the development, screening on the development boundary edge, and reflecting the 'edge of settlement' nature of the site;
- The Heritage Impact Assessment noted that the primary views in Flitwick Manor Park are confined to the main parkland area of the site, particularly for views of Flitwick Manor itself, although there are some more limited views from the wood.

The assessments conclude that the impact on the setting of Flitwick Manor Park is low, and the current ecological value of the land is low. It also argues that the development proposal does not have a significant impact on the landscape.

The application proposes a number of measures that seek to mitigate the impact of the development. The most notable of which is planting along the eastern boundary of the site, adjacent to the current woodland in Flitwick Manor Park. Other measures include integrating bird and bat boxes within all buildings, and the establishment of a variety of new habitats in the open areas of the development.

The PIWG considers that the impacts of the development on the Flitwick Manor Park County Wildlife Site have not been given the due consideration or assessment of impact that reflects the

important nature of this habitat. The Town Council's own ecological surveys specifically identifies two types of National Priority Habitat in Flitwick Manor Park:

- Parkland, and;
- Floodplain marshy grassland and swamp.

With the exception of surveying the main pond in Flitwick Manor for the presence of Great Crested Newts (none were found), no assessment of the impact of the scheme on the ecology and potential conservation of the Flitwick Manor Park County Wildlife Site has been undertaken. The extent of the works intended to mitigate the impact of the development on Flitwick Manor may be considered by the applicant that this meets the requirements of Local Plan Policy EE3 (Nature Conservation), which states that:

Development proposals will be permitted where...They are designed to prevent any adverse impact on...County Wildlife Sites.

The assessment of adverse impacts will apply to potentially damaging development proposals that may affect the designated area. It will include the consideration of adverse cumulative effects with other existing or proposed development. Adverse impacts, such as disturbance through increased recreational pressure can result from new development and require mitigation to prevent detrimental impacts to the ecological resource.

The PIWG considers that the impact on the ecology of the Flitwick Manor County Wildlife Site has not been given due consideration in the development proposals, and therefore the adverse impacts on this ecology has not been considered. This makes this development contrary to this policy.

The PIWG also considers that in the Heritage Assessment, the impact of the development on the heritage value of the woodland of Flitwick Manor Park has not been given due consideration. The Group accepts that there is significant heritage value in the relationship between the park and Flitwick Manor itself. However, the impact on views into and out of the woodland and the associated heritage value of the woodland is deemed of secondary importance by the Heritage Assessment. This would require a more detailed, technical assessment of the development on this heritage asset, and as such is not considered by the group to be grounds for objection.

The PIWG notes and agrees with the comments of the Central Bedfordshire Landscape Officer with regards to the potential landscape impacts of this development. In the first instance, the site is outside the settlement envelope of Flitwick. Whilst the site may be on the settlement edge in terms of proximity, it is the view of the PIWG that this is not the case in terms of the character of the site. This is emphasised by the strong rural feel and visual separation caused by the borders with Flitwick Manor Park, and open countryside to the South, West, and North West. The relatively isolated homes on Church Road to the north do not give the feel of a built up area.

The PWIG also notes that the site sits within the Greensand Nature Improvement Area. Policy EE8 of the Local Plan states that

Development proposals within the Greensand Ridge Nature Improvement Area (NIA) will be permitted where they:

- 1. Demonstrate how a net gain in biodiversity will be delivered, including how gains in the quality and connectivity of ecological networks within and linking to the development will be delivered;*
- 2. Enhance wildlife networks and increase ecological connectivity through buffering, extending and linking characteristic habitats (as listed above) both within and adjacent to developments;*
- 3. Demonstrate how provision is made for species recovery and resilience;*

4. *Respect the topography and landscape of the NIA and be designed in such a way that it minimises visual impacts and protects local amenity; and*
5. *Provide opportunities for people to access and experience the NIA in a way that is sympathetic and sustainable towards existing habitats.*

The developer contends that all but the closest views of the site will be filtered, softened, or screened, to minimise the visual impact of the scheme. However, from reviewing the proposals, the PIWG can only identify that this may be so through the creation of a natural boundary between the woodland and the development. The impact of the development is likely to be particularly significant on views from the south of the site, especially towards Westoning. The PIWG agrees with the comments of the Landscape Officer at CBC who notes that.

“The site is located outside the settlement envelope on rising topography above the Flit Valley and with expansive views to the south east and south – to Westoning and Chiltern Hills beyond forming the horizon. The elevation and openness of the site within the immediate and wider landscape setting is highly sensitive to inappropriate change.”

The PWIG also disagrees with the assertion by the developer that the fieldscape of the site will remain unaltered. This site will include substantial topographical works, in addition to providing a significant number of dwellings on what is currently an arable field.

Transport and traffic impacts

The Transport Assessment that has been provided as part of the development details what the transport impacts of the development are likely to be. In summary, the Transport Assessment concludes that:

- The planned development, whilst increasing traffic flow along Church Road, is unlikely to cause issues in terms of traffic congestion along Church Road as far as the junction with Dunstable Road;
- The majority of traffic into and out of the development will be going into and out of Flitwick, or through Flitwick to other destinations, with relatively little heading West along Church Road from the site;
- There are no significant safety issues on Church Road in the vicinity of the site in terms of the number of recorded slight, serious, or fatal crashes;
- The site is some way from local services, with the nearest bus stop being 350m from the site, and the services (doctors, food stores etc.) being located in the town centre.

The Framework Travel Plan contains a list of potential initiatives to encourage sustainable travel to the site. This includes a dedicated minibus to help residents of the site access services in the town, encouraging walking to local facilities as part of independent living, and encouraging car sharing.

Additionally, changes to Church Road are recommended as part of the application, which includes the following. This design has been subject to an initial Road Safety Audit and comments from CBC, to which the design has been updated to reflect these:

- A new footway along the northern edge of Church Road;
- A raised table at the junction of Temple Way and Wren Close;
- A raised table at the junction of Manor Way and Church Road;
- A speed table on Church Road, near the blocked up section of Church Road that runs down towards Dunstable Road;
- A build out that functions both as an informal pedestrian crossing and a traffic calming measure just to the North East of that location;
- A build out that functions both as an informal pedestrian crossing and a traffic calming measure on the North Eastern corner of the site

The PIWG has concerns that the methodology used to identify the number of trips (what is called the trip rate per dwelling) is based on sites that are lower in terms number of dwellings, and so does not give an accurate reflection of the impact of the development. However, as both the Manor Way / Church Road and Temple Way / Dunstable Road junctions are operating well within capacity, it is likely that even a substantial increase in traffic from this development is unlikely to be assessed as having a significant congestion impact. Therefore, the impacts on traffic congestion are not grounds for objection.

The PIWG is concerned that the Transport Assessment highlights speeding traffic in the vicinity of the site, with the average speeds being between 35mph and 39mph in the site location, in excess of the 30mph speed limit. The raised tables and build outs are likely to overcome this issue for vehicles approaching from Flitwick. But no such measures have been proposed to slow traffic approaching from the East. This is a significant safety issue not considered in the Road Safety Assessment, albeit one that could be overcome by delivering traffic calming measures approaching the site from this direction.

The applicant states that this issue has been considered by providing a junction with the development that has good sight lines up and down Church Road, and so vehicles emerging from the development have good visibility of approaching traffic (and approaching traffic of them). This junction has been designed to the average speed, however doing so is contrary to best practice in Manual for Streets. This recommends that junctions be designed to the desired speed at which traffic should approach (in this case, we would assume this is the speed limit of 30mph). Therefore, measures should be taken to reduce the speed of approaching traffic.

The PIWG also notes that whilst a 'swept path' analysis has been undertaken to determine whether the planned changes can handle larger delivery vehicles effectively (they can), such an analysis has not been undertaken on the remainder of Church Road leaving Flitwick. This road is narrow, with even cars passing each other at close quarters and with difficulty, especially when the hedgerows are in bloom. This impact has not been considered in the application, and is considered to be a significant oversight.

Finally, the PIWG is concerned about the proposed pedestrian footpath linking the site to the current pavements along Temple Way. Residents walking from the site would be required to cross 3 informal crossings – including crossing Church Road twice – in order to access a pavement into Flitwick that is already on the same side of Church Road as the development. We believe that this is against CBC's own guidance on providing pedestrian links (and even if the crossings were needed, CBC's own recommends considering more formal pedestrian crossings), and is against established best practice on providing direct pedestrian routes that cater for those with limited mobility. This could be overcome by simply providing a footpath along the southern edge of Church Road.

Impact on Flooding and Drainage

The application includes a Flood Risk Assessment and Drainage Strategy. In summary, the assessment concludes that the site itself is not susceptible to flooding, and that the proposed development of the site is considered to be appropriate in terms of flood risk and drainage. This includes the implementation of a Sustainable Urban Drainage Strategy (SuDS) to reduce the amount of stormwater run-off that would flow downhill into the River Flit. The strategy also proposes detention basins, swales, and geocellular storage as part of this strategy – essentially holding up flood water through the use of ponds, reedbeds, and storage facilities close to buildings.

Without further detailed and professional analysis of the Flood Risk Assessment and Drainage Strategy, the PIWG cannot confirm whether these measures will be sufficient to reduce the risk of flooding on the River Flit and specifically the field to the south of the site in Flitwick Manor Park. This field is known to flood and become very marshy during periods of wet weather. As well as having a duty of care to Flitwick Manor Park, the Town Council has a statutory duty to promote biodiversity, including in the nationally-important marsh and wetland habitat of this field. The Group

is extremely concerned that the applicant has not sought to work with the Town Council as part of the development of its Drainage Strategy, instead focussing on consultation with Anglian Water and the Internal Drainage Board.

The PIWG is also concerned that the plans for development include a foul pumping station for the whole development in the south west corner of the site, close the field mentioned above. The Drainage Strategy notes that a rising main would be required to convey foul sewage from this pumping station back up to the public foul sewer on Church Road, which would require discussion and agreement of Anglian Water. The Group is concerned that should this pumping station fail, there may be a risk of the release of sewage into the field, and this is a matter that needs to be urgently clarified in discussion with the developer and Anglian Water.

Design of the development

The design of the buildings on the development site is a matter that will be covered in greater detail in any Reserved Matters applications that come forward should Outline Planning Permission be granted. However, the development has submitted a Design and Access Statement in support of the application, and within this can be found a Design Statement. This can be summarised as so:

- Housing units designed with the care of residents as a top priority, and laid out in a manner so that the main communal facilities are centrally located in the development;
- The specialist care home facility – the largest building on the site – is located close to the entrance onto Church Road, and will be a maximum of two storeys in height;
- The buildings will be a mixture of 1 – 2.5 storeys in height, and the materials used are expected to be defined as a condition of the Outline Planning Permission;
- The adoption of a Landscaping Strategy that seeks to strengthen existing site boundaries with further planting, creating a ‘natural green interface’ on the southern and western edges of the site, and maintain the current Public Right of Way that crosses over the site;
- The use of native trees and planting throughout the development;
- The provision of internal pedestrian routes, and car and cycle parking in line with CBC’s adopted parking standards.

Some of the parameter plans are shown below.

The PIWG found it difficult to comment on the specific designs as there is no detail provided as part of the planning application. However, the Group consider that the scale of the development is not in keeping with the density of surrounding land uses, nor with the sites countryside nature. Furthermore, the Group considers that the density and scale of the development will have a significant visual impact not just from Church Road, but from other surrounding areas such as Westoning, from which the site is visible.

The PIWG also considers that the scale of the development that is planned does not respect the landscape of the Greensand Ridge Nature Improvement Area. This is because the site will not have a minimal visual impact on the Nature Improvement Area owing to its scale and the proposed heights of the buildings. Whilst the Public Right of Way is maintained, the Group considers that access to and experience of this part of Nature Improvement Area will be fundamentally changed, and not in a manner that is sympathetic in terms of design, or sustainable in terms of its outcomes.

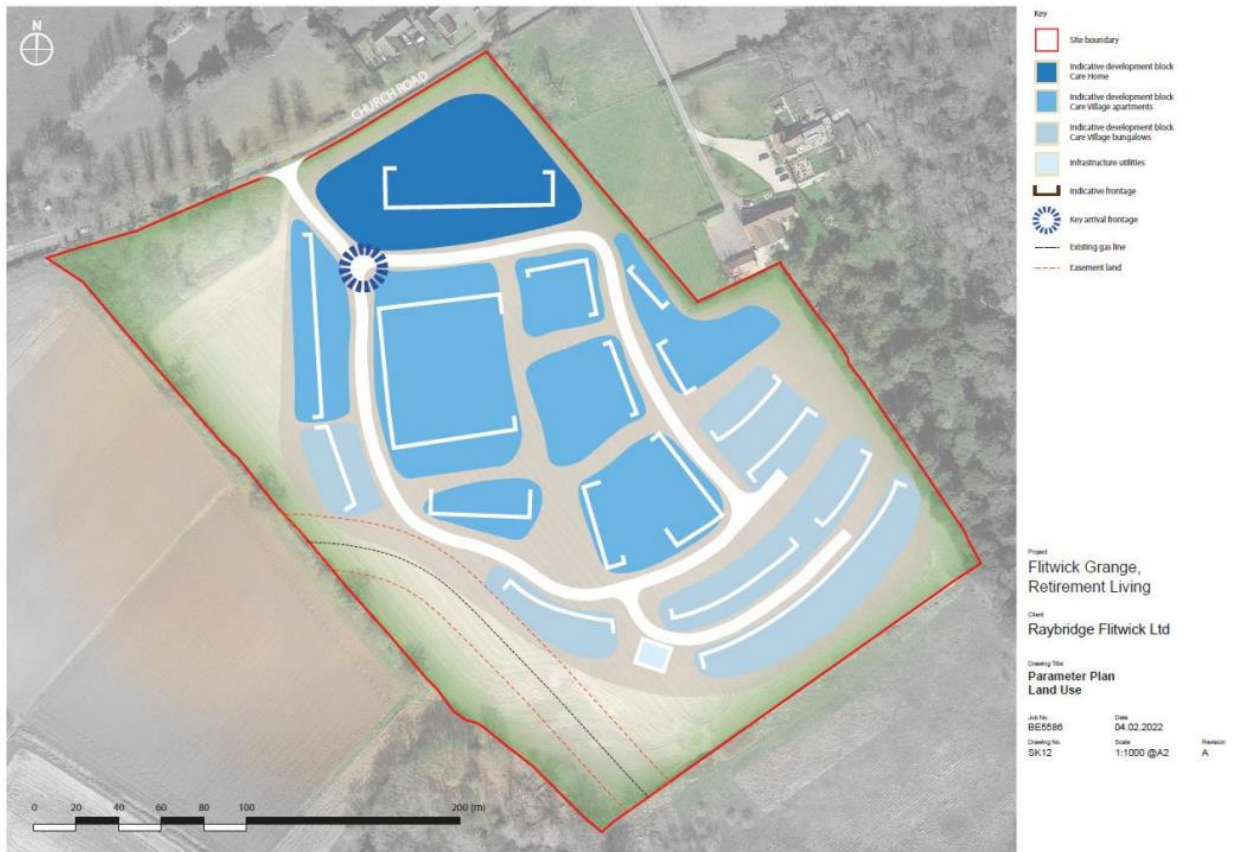


Figure 2 - Land Use Parameter Plan



Figure 3 - The Landscape Parameter Plan

Impact on Healthcare Facilities

The PIWG notes that no assessment has been undertaken of the impact of the development on local healthcare facilities. Furthermore, at the time of writing this report, there is no evidence that the Clinic Commissioning Group (CCG) has been consulted on the development of these proposals, nor has the CCG provided any comments on the application.

Healthcare facilities in Flitwick are significantly over-subscribed, and are known to be above the national average in terms of number of patients to GP surgeries. Whilst much of the immediate medical needs of the residents of the site may be catered for on site, this development will increase the demand on already overstretched local healthcare facilities. With no mitigation measures considered or identified by the applicant.

Economic impact of the development

The applicant published an economic impact assessment of the development as part of its planning application. The assessment estimates that an additional 63 jobs will be provided directly by the development once it is operational, and generate £25.9 million in Gross Added Value. While the PIWG considers that some of the estimates of jobs created and economic impact may be over-estimated (particularly the 3054 direct and indirect jobs to be created over 10 years), it is likely that there will be an overall net positive economic impact of the development for Flitwick. This is likely due to the additional jobs the development will create, and a likely increase – even if small – in spending in local shops by residents of and visitors to the development.