



Flitwick Town Council

Report to Town Council on 15th November 2022: Land south of Steppingley 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.

Recommendation

That that Council **objects** to the application for the Land south of Steppingley Road on the following grounds (in no particular order):

- The development does not satisfy the tests of presumption in favour of sustainable development as set out in Paragraph 11 of the National Planning Policy Framework, owing to the matters of which it is contrary to the Local Plan set out below;
- The development does not maintain clear boundaries between the site and the north-western and south-western boundaries to protect open countryside views, and is therefore contrary to Policy HA1 of the Local Plan;
- An up-to-date, comprehensive ecological assessment has not been undertaken in support of this application, making this application contrary to Policies EE3 and HA1 of the Local Plan;
- Robust consideration of the cumulative highway impacts of planned growth in Flitwick has not been made in the Transport Assessment, making the application contrary to Policy T1 of the Local Plan;
- The scheme has not demonstrated that it is of a valuable public benefit that overrides the need to protect Grade 2 Agricultural Land, making the application contrary to Policy DC5 of the Local Plan;
- Population growth in Central Bedfordshire in excess of that forecast in the Local Plan means that this application is premature in advance of a review of the Local Plan, which is required as part of Policy SP1a of the Local Plan.

The Town Council also has a number of concerns about the impacts of the development on local services. It also considers that the development is unsustainable given the current and planned infrastructure, and accordingly may be contrary to National Planning Policy Framework Guidance on sustainable development.

In the event that planning permission is granted, the Town Council recommends that the following conditions be associated with the granting of this planning permission. It should be noted that the inclusion of these does not resolve its objection to the application:

- Funding for improvements to local services like healthcare and education not be ring-fenced for infrastructure improvements (e.g. buildings) but also be considered for the provision of additional staff, such as teachers and GPs;
- Funding for improvements to local services like healthcare and education is released upon the commencement of the construction of the site at the very latest, ideally earlier;
- Funding for improvements to local services like healthcare and education is available for 5 years, so that the delivery of these improvements can be accelerated, and with a commitment to deliver such service improvements in advance of site completion;
- A commitment on behalf of the application to plant trees and border planting in a manner that shields the visual impact of the development, and maintaining this vegetation in an acceptable manner for 10 years in a way that boosts biodiversity;
- Any funding provided for improvements to local services like healthcare and education is ring-fenced so that it is spent on facilities in Flitwick, with the possible exception of funding for Redborne Upper School;
- An archaeological assessment of the site needs to take place in advance of construction proceeding, and any archaeological findings are preserved for the future interest of local people;
- The Framework Travel Plan, including its funding and the provision of a Travel Plan Co-ordinator, be secured via a Section 106 Planning Agreement;
- A dedicated walking and cycling route, either through a improvements to footpaths and a segregated cycle track or through a shared use path, be provided from the site to the town centre along Steppingley Road;
- Improvements to the Flitwick – Ampthill – Milton Keynes bus service along Steppingley Road to every half an hour be funded for a minimum period of 5 years;
- The planned informal crossing of Steppingley Road for pedestrians become a formalised crossing, either through a Pelican or Toucan crossing, with associated speed reduction measures to reduce the approach speeds for traffic approaching the development site from the roundabout with Fordfield Road
- The Town Council is willing to discuss matters concerning the adoption of open spaces and play areas in the site, subject to further discussions, successful completion of funding and legal agreements, and further resolutions of the Town Council.

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 'Steppingley Road,' but formally known Land south of Steppingley Road, Flitwick. Councillors can view the application documents online on the [Central Beds Planning Portal](#), citing planning application reference CB/22/04108/FULL.

In contrast to previous applications, the Planning Improvement Working Group has taken a more methodical approach to reviewing this application, gathering evidence associated with it, and engaging with interested parties.

This process has involved the following:

- Considering the evidence of the application over 5 separate sessions of the PIWG;
- Holding two meetings with representatives of the Flitwick Local Action Group (FLAG), being an introductory session on 13th October 2022, and a question and answer session on 2nd November 2022;
- Holding a meeting and question and answer session with the applicants planning representatives on 3rd November 2022;
- Holding a question and answer session with the Central Bedfordshire Council case officer on 8th November 2022.

It should be noted that the Town Council itself also received a briefing from the applicant on the development in May, prior to the establishment of the PIWG. Whilst a number of suggestions were made by Town Councillors during that briefing, it needs to be stressed that at no point was any indication given by Town Councillors as to whether the Town Council would support or oppose the development. Stating that this would only be a decision that could be made by Town Council. These suggestions primarily related to making improvements to highways, and improving the performance of the site in terms of biodiversity such as bat boxes.

There was an intention to hold a public meeting for this application, following the Town Council resolution on this matter at the meeting of the Extraordinary Town Council on 1st November. The intention was to make residents aware of the application, but crucially to hear the arguments on the application from all side – the developer, FLAG, and Central Bedfordshire Council. The intention being to inform the public, as opposed to taking a particular side. In the end, the developer and Central Bedfordshire Council did not commit to taking part, and the PIWG agreed that with this in mind that a public meeting should not proceed. In light of this, members of the public have been encouraged to submit their comments through social media posts, leaflets in the Rufus Centre and the Library, and posters on each poster board throughout the town.

It should also be noted that one member of the PIWG is an active member of FLAG. Additionally, the Chair of the PIWG has also attended FLAG meetings, and assisted the group in getting itself established. The advice received from the clerk at the time was that so long as this activity is declared as a non-pecuniary interest, this is not an issue. Both the Chair and the member of the PIWG have been reminded of the remit of the group to be objective in its assessment of the application, and agreed to carry out that duty in the assessment of this application. This information has been included here for transparency.

It should be stressed that this report, and the recommendations contained within it, are the considered opinion of the PIWG. During the discussions within the group, a number of arguments were put forward both in favour of the development and against it. This report reflects the agreed position of the group following these discussions.

Finally, 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 200 homes on Land South of Steppingley Road, opposite the Leisure Centre and the retirement village currently under construction. The description of the planning application is as so:

Erection of 200 dwellings, including new access roads, landscaping, open space, SuDs¹ attenuation and associated infrastructure and engineering works.

The overview map, which also gives an indication of the sites location, is shown in Figure 1.

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, housing allocation, and green belt

¹ Sustainable Urban Drainage Systems

The application site is designated as an allocated housing site in [the Central Bedfordshire Local Plan](#), as site reference HAS17 (Land South West of Steppingley Road), which provides an allocation for up to 216 dwellings on the site as part of growth plans for Central Bedfordshire. To particular policies of the Local Plan are relevant to establishing the principle of development on the site. These being Policy SP1: Growth Strategy and Policy HA1: Small and Medium Allocations. These policies are reproduced here in full.



Figure 1 - Overview map

Policy SP1: Growth Strategy

A minimum of 39,350 homes, and approximately 24,000 new jobs will be delivered in Central Bedfordshire over the period 2015 to 2035. Of the 39,350 homes, this includes around 27,696 homes which are already planned for or built, as well as 7,350 homes to be delivered by 2031 to meet unmet housing need arising from Luton.

In order to accommodate the growth required up to 2035 in a sustainable and controlled manner, growth will be distributed throughout Central Bedfordshire, including on land currently designated as Green Belt. Green Belt boundaries will be redrawn for a small number of sites where a strong case can be made that they meet the exceptional circumstances tests for removal and allocation for housing.

- 1. New homes and jobs will be delivered via a combination of strategic and small - medium scale allocations throughout Central Bedfordshire. Strategic allocations will be made at the following locations:
 - a. North of Luton (Town Extension) - approximately 3,600 homes and 7ha employment land*
 - b. Sundon Rail Freight Interchange (RFI) (Strategic Employment Area) - 45ha*
 - c. Marston Valley (New Villages) - 5,000 homes and 30ha employment land*
 - d. Marston Gate (Strategic Employment Area) - 35 ha**

- e. East of Arlesey (Town Extension) - 2,000 homes
 - f. East of Biggleswade (New Village) - 1,500 homes and 2ha employment land
 - g. Holme Farm, Biggleswade (Employment Area) - 78ha, including approximately 25ha of mixed B2, B8 and E(g) uses and 38ha of B8 strategic floorspace
2. In addition, the unmet housing needs of 7,350 homes arising from Luton will be delivered by 2031 through a combination of the following sites:
- a. (SC1) North Houghton Regis (1&2)
 - b. (SA1) North of Luton
 - c. (HAS05) Land East of Barton le Clay
 - d. (HAS07) Caddington Park, Caddington
 - e. (HAS14) Land off Eaton Park
 - f. (HAS17) Land South West of Steppingley Road, Flitwick**
 - g. (HAS18) Site adj. to Flitwick Garden Allotments off Steppingley Road
 - h. (HAS19) Land at Upper Gravenhurst/The Pyghtle
 - i. (HAS20) Land West of the Midland Mainline Railway, Harlington
 - j. (HAS21) Land West of Sundon Road, Harlington
 - k. (HAS25) Land at Leighton Road, Hockliffe
 - l. (HAS26) A5 Watling Street, Hockliffe
 - m. (HAS28) Bidwell Gospel Hall (Dell Mount)
 - n. (HAS29) Land to the East of Houghton Regis
 - o. (HAS38) Land fronting Silsoe Road, Maulden
 - p. (HAS49) Land East of Leighton Road, Toddingtonq. (HAS50) Alma Farm, Toddington.
 - q. (HAS51) Land off Flitwick Road, Westoning
 - r. (HAS52) West View Farm, Westoning

Development will also be brought forward through medium and small-scale extensions to villages and towns throughout Central Bedfordshire (as identified in Policy HA1) and through Neighbourhood Plans.

Planning applications for piecemeal development that prejudices the delivery of allocations set out in this policy will be refused.

Policy HA1: Small and Medium Allocations

Sites identified on the Policies Maps at Appendix 6 and listed in the table below are allocated for residential development. In addition to the general policy requirements of this Local Plan, development of these sites must take full account of the site-specific issues which are identified and set out on a site-by-site basis where relevant.

Within the detail for Policy HA1, the following detail is provided relating specifically to site HAS17.

| | | | | | | |
|---|------------------|-------|----------|----|-----|------|
| HAS17 | Steppingley Road | South | Flitwick | 40 | 216 | 9.00 |
| HAS17 Additional Policy Requirements | | | | | | |
| - Woodland buffer required to north-western and south-western site boundaries to protect open countryside views. This should be of a similar nature to the existing woodland to the south-eastern boundary of the site. | | | | | | |
| - Due to the sites proximity to Flitwick Wood, particular regard must be paid to Policy EE3: Nature Conservation. | | | | | | |
| - Site is within an MSA, a Minerals Resource Assessment will be required. | | | | | | |

Figure 2 - Detail on HAS17

The overarching point here is that within the Local Plan, the general principle of development of the site is accepted. However, because of the nature of the site additional requirements relating to requiring a woodland buffer to protect views, and a need for the site to pay particular attention to the proximity to Flitwick Wood. Additionally, Policy HA1 states that sites must take full account of site-specific issues when being brought forward for development.

Much comment has been made of this site being a greenfield or green belt site. It is worthwhile noting that this site was removed from the green belt as part of the development of the Local Plan. In the [Inspectors Report](#) to the Local Plan, the Planning Inspector gave the following observation:

“Site HAS17 is bounded by development on two sides and is located directly opposite the Flitwick Leisure Centre. Bus stops are adjacent to the site on Steppingley Road, which is one of the primary routes in and out of Flitwick. The town centre is within walking distance and potential future occupants would be able to access services, facilities and the train station on foot or by cycle. The allocation is therefore consistent with the Plan’s strategy and will make a significant contribution to meeting housing needs. The Green Belt Study (Stage 3) also concludes that extension of the settlement edge, framed by a belt of new woodland planting, will not have more than a moderate impact on the strength of the Green Belt around the town. Exceptional circumstances therefore exist to justify removing the site from the Green Belt.

There was much discussion within the Group about the relative merits of this argument and its justification for removing the site from the green belt. Particularly relating to the extension of the settlement edge, and concerns about future coalescence of Flitwick and Steppingley. The group has a great deal of sympathy with this position, and to a large part agrees that the development of this site may set a precedence for the further expansion of Flitwick towards Steppingley. But in purely policy and planning process terms, the arguments of the Inspector have been accepted by Central Bedfordshire Council, and the principle of the development of the site is accepted.

Further evidence was also presented by FLAG relating to the Local Plan achieving its targets for population growth. The current Local Plan based its assessment on population projections, as opposed to a now standard methodology of projections of the number of houses. The population of Central Bedfordshire in the 2021 Census was 294,200. The population projections for 2035 under the Strategic Housing Needs Assessment 2017, which underpinned the Local Plan, projects a population of 325,061. Current projections are that population growth is significantly ahead of what was forecast in the evidence underpinning the Local Plan.

Whilst this would appear to indicate that this development may be required for additional housing need from a faster-than-expected growing population, another factor needs to be considered. That is Policy SP1a of the Local Plan, which states:

Policy SP1a: Partial Review of the Local Plan

The Council will commence a Partial Review of the Plan within six months of adoption of the Local Plan 2035.

The Partial Review will investigate, as part of the wider statutory plan-making processes and identify where necessary, opportunities for future growth that can capitalise on any appropriate commitments to improve existing, or provide new, strategic infrastructure.

Following the review, the Plan will be updated, where necessary

The argument of FLAG is that as population is growing faster than anticipated, and that Central Bedfordshire Council has not progressed with the review of the Local Plan within 6 months of its adoption as specified by this policy, there are grounds for the application to be deferred pending this review, if not rejected for the same reason.

The PIWG considers that there is a logic to this argument. A number of factors have affected population growth in Central Bedfordshire, especially during COVID-19, that have resulted in its

acceleration. Moving to defer the application or reject the application on this fact as a planning logic to it, considering that Central Bedfordshire Council is likely to only be progressing the development of a review of the Local Plan in the New Year – well in excess of 6 months since the adoption of the Plan. In light of the evidence on population growth presented, the PIWG considers that this is a material consideration in the determination of this application, and at least grounds to defer its determination.

A final point to consider is the overall sustainability of the site. The National Planning Policy Framework paragraph 10 states that for decision making, a presumption in favour of sustainable development means the following:

(c) approving development proposals that accord with an up-to-date development plan without delay; or

(d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

The site itself is contained within the Local Plan, and therefore would appear to satisfy the test of (c). However, such a consideration needs to account for the Local Plan as a whole, and as the rest of this report indicates, the PIWG is not convinced that this test has been satisfied.

Design of the development

The application contains several plans and concept designs for the development. In the Planning Statement and Design and Access Statement, a number of aspects of the design were highlighted. These are summarised here.

- The site access roads will be constructed to provide a 5.5 metre wide carriageway flanked by 2.0 metre wide footways on both sides. Junction radii of 10 metres will be provided for entry and exit to the site from Steppingley Road, as requested by [Central Bedfordshire Council]. The proposed footways on either side of the site access roads will connect into a proposed footway on the south-western side of Steppingley Road, which will in turn connect into the existing footway network.
- The proposed development will comprise 200 units across a developable site area of 5.51 hectares and therefore represents a dwelling density of some 37 dwellings per hectare. The proposed housing mix is 50% three bedroom homes, 24.5% two bedroom, 16% four bedroom, 6.5% one bedroom, and 3% five bedroom².
- The establishment of 5 character areas, to provide a mixed built form for the development in different areas, intending to reflect the local character.
- This proposal provides a variety of landscape uses including a play area (0.295ha), a linear park or green link (0.262ha), a perimeter landscape buffer (1.544ha), ‘incidental’ public opens space (0.215ha), a pond and shallow slope attenuation basin (0.646ha)
- Traffic calming is provided in the form of ramped tables and speed restraint bends to lower vehicle speeds. A separate network of cycleways and footpaths is also proposed through landscape spaces. The alignment and position of these has been considered with regards to links with the wider network between destinations such as the leisure centre, Flitwick Wood and schools such as Templefield and Woodland;

² The matter of affordable homes is discussed in a separate section

- Vehicle parking has been provided for every dwelling, usually alongside the home, located at the front or within small parking courtyards. Visitor parking has been provided as part of the adoptable highway and dispersed across the development. A total of 480 spaces are provided in total.



Figure 3 - Landscape details in the Green Infrastructure Masterplan for the site



Figure 4 - Movement and Access Plan from the Design and Access Statement

How the development fits into the existing landscape, specifically in relation to providing definitive borders to the site and mitigating the impact of the site on views and on the surrounding area, is considered in greater detail in a separate section of this report. This section considers the internal design of the development from the experience of someone on the site should it be built.

The PIWG notes that the planned amount of green space on the site exceeds Central Bedfordshire Council standards for housing developments, and indeed is one of the better qualities of the development proposals. For those who would be resident on the site, the proposed landscaping, linear parks, informal open spaces, and walking and cycling links could make for a visually attractive development. However, the PIWG notes that there is a lack of detail on many of the building elevations and impact on the topography of the site.

The PIWG also notes that many of the dwellings will have solar panels on the roof from the outset. This is consistent with wider objectives to reduce greenhouse gas emissions from new developments, and the use of renewable energy is something that should be actively encouraged.

The PIWG is concerned about the impact of the development on the trees along Steppingley Road. This is an attractive approach into the town, and the planned access roads will involve the removal of a tree on the road, and the construction of the footpath along Steppingley Road will result in new surfacing being laid very close to trees and their roots. The PIWG is concerned about how the impact of this work on maintaining the health of the trees along Steppingley Road, and the lack of details as to required ongoing maintenance of these trees will ensure that this attractive approach into the town is not lost.

It should be noted that as of the time of writing this report, Central Bedfordshire Council's Tree Officers have not raised any objections to the development.

Relationship of the development with the surrounding landscape and maintaining a clear boundary

The impact of the development on the surrounding landscape, and maintaining a clear boundary between the site and surrounding areas is of significant concern to local residents, and to the PIWG. The visual and landscape impacts of development are subject to a fair degree of subjectivity in terms of what constitutes an attractive landscape or development. Regardless of this, the PIWG has a number of concerns about the visual impact of the development, concerns that have not been abated through discussions with Central Bedfordshire Council.

The Landscape and Visual Assessment of the site, provided by the application, places a significant emphasis on the impact of the development being primarily local, with the most significant impacts being on views from properties close to the site. The assessment states that views of the site from Flitwick are diminished by the wooded boundary and the local topography.

As of the time of writing this report, the Central Bedfordshire Council Tree and Landscape Officer has commented as so:

"The tree report shows the majority of the trees being suitable for retention. The trees are on the border of the site and should be retained to ensure the development is in keeping with the local area. The proposed layout appears to retain the majority of the trees. The tree to be removed does not appear to impact the overall area."

In discussion with the PIWG, Central Bedfordshire Council have indicated that there are a number of concerns about the application and its visual impact. The most notable being the lack of detail as to the impacts of the topography of the site on its visual prominence. It should be made clear that it was not implied that this would be a reason to refuse an application, but that this was an outstanding matter between the Council and the developer.

A key consideration is the need to maintain a clear boundary between the site and the north-western and south-western boundaries to protect open countryside views, as specified in Policy

HA1 of the Local Plan and the additional HAS17 Additional Policy Requirements. Despite the planned planting along both these boundaries, the Landscape Assessment indicates that the residual impact of the development on these footpaths and boundaries to be *“Major / Moderate Adverse reducing to Moderate Adverse as planting matures.”*

Considering this evidence, the PIWG is not convinced that the application meets the additional policy requirements under Policy HA1, and is therefore contrary to the Local Plan.

The impact of the development on nature and biodiversity

The Net Biodiversity Gain Action Plan prepared for the applicant forecasts a net gain in biodiversity of the site of 7.63% could be achieved through the development proposals and what it is in the Green Infrastructure Masterplan. Putting this development in compliance with Local Plan Policy EE1: Green Infrastructure. Though the plan notes that there is the potential for higher gain, it also notes in the summary that:

“It should be noted that the predicted net-gain in biodiversity is reliant on the successful creation of habitats and management for the foreseeable future. It will be critical to ensure that appropriate management activities are put in place in order to achieve the desired condition of the proposed habitats. It is recommended that measures to ensure the successful creation and long-term management of proposed habitats are outlined in a Landscape and Ecology Management Plan (LEMP) for the Site.”

The baseline assessment of the current biodiversity of the site is based upon a Preliminary Environmental Assessment, combined with a nationally-recognised methodology from the Department for Environment, Food, and Rural Affairs (DEFRA) called the Biodiversity Metric. This Preliminary Environmental Assessment is based upon a desktop study of the site, as well as a single field survey taking place over one day.

Whilst there is no evidence to indicate that the survey undertaken was not robust in its delivery, the constraints section of the Preliminary Environmental Assessment does state that a single visit cannot always ascertain the presence or absence of a protected species. Only its potential. Only additional surveys can ascertain whether a particular species is present on the site.

Members of the PIWG have also raised the matter that, through their own recreational use of the footpaths surrounding the site, they have spotted several species of interest using the site. This includes deer, Skylarks, and other ground nesting birds. Although these observations have not been formally recorded in any official capacity.

This combined evidence gives the PIWG doubt that the application is in accordance with Local Plan policies on protecting biodiversity. Whilst the PIWG has no evidence to indicate that the technical work that has been presented is methodologically flawed, it is limited in scope and does not confirm the absence of protected species that have been known to inhabit the site. In particular, the PIWG is of the view that the site may be contrary to Policy EE3 of the Local Plan, which states:

Policy EE3: Nature Conservation

Important habitats and sites of geological and geomorphological interest will be protected, maintained and enhanced.

Up to date, comprehensive ecological surveys undertaken in accordance with industry guidelines and standards will be required to support and inform development proposals that would affect sites for nature conservation, protected species, or species and habitats of principal importance demonstrating development will deliver a net gain.

Development proposals will be permitted where:

1. *They do not have an adverse effect, either alone or in-combination, on European designated sites, unless they satisfy the requirements of the Habitats Regulations;*
2. *They will not adversely affect SSSIs, NNRs and Roadside Nature Reserves; and*
3. *They are designed to prevent any adverse impact on:*
 - a. *County Wildlife Sites;*
 - b. *Local Nature Reserves;*
 - c. *Local Geological or Geomorphological Sites;*
 - d. *Protected species; or*
 - e. *Species and habitats of principal importance.*

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.

It is the view of the PIWG that an up-to-date, comprehensive ecological assessment has not been undertaken in support of this application, and therefore this application is contrary to this policy. This also makes this application contrary to Policy HA1, which under the Additional Policy Documents states that particular regard should be given to this policy.

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 Steppingley Road, is unlikely to cause issues in terms of traffic congestion to a degree that is constituent with what National Planning Policy Framework defines as a significant or serious issue;
- The traffic generated by the development is likely to be dispersed, choosing one of three routes: down Steppingley Road towards the Town Centre, along Froghall Road towards the A507, and towards the Millbrook Roundabout;
- There are no significant safety issues on Steppingley Road in the vicinity of the site in terms of the number of recorded slight, serious, or fatal crashes;
- The site is well served by sustainable transport. A bridleway runs along the eastern edge of the site that will be improved, and there is a cycle route nearby along Windmill Road. Additionally, the site is served by an hourly bus towards the town centre, Ampthill, and Milton Keynes, as well as being within 900m walking distance of the railway station;
- 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. These are primarily about providing information for residents on local bus services and cycle routes, and appointing a Travel Plan Co-ordinator for the site to oversee this promotion. It should be noted in the Transport Assessment, it is stated that the any impacts of the development in terms of traffic could be mitigated by this Travel Plan being successful.

Access to and from the site is provided by two access roads operating as a loop. The original plan was to have a single access point onto the site, but this was rejected by Central Bedfordshire Council on account of this access point would be wider, and necessitate the removal of more trees on Steppingley Road.

Upon reviewing the Transport Assessment and the Travel Plan, the PIWG has a number of concerns about the assessment undertaken and its suitability in mitigating the impacts of the development. The group has particularly referenced Policy T1 of the Local Plan which states:

Policy T1: Mitigation of Transport Impacts on the Network

Travel Plans, Travel Plan Statements and Transport Assessments will be required for any development which meets or exceeds the Gross Floor Area thresholds set out in the Council's Guidance on Travel Plans and Transport Assessment.

It should be demonstrated how the proposal will seek to reduce the need to travel and secure a modal shift towards sustainable forms of transport. This should be through an approach which first considers the ability to cater for walking and cycling, provide suitable public transport services, and make better use of existing highway capacity before considering the provision of additional roads.

Evidence must be provided in Transport Assessments to demonstrate:

- 1. The principles established to give priority to pedestrians and other vulnerable road users in new developments, together with links to local service provision;*
- 2. Comprehensive, convenient and safe pedestrian and cycle links to schools, local employment and service provision;*
- 3. Connectivity with existing walking and cycling networks; and*
- 4. Robust consideration of the cumulative impacts of planned growth, including the cross-boundary impacts where appropriate.*

Transport Assessments and Travel Plans must demonstrate how the development can be served by public transport services and the frequency of the service.

Where a Travel Plan is in place, the developer and/or user will provide an annual update on their action plan, reporting progress against agreed aims and targets for a minimum of 5 years post occupation.

The Council will require developers to deliver Travel Plan measures as outlined in their approved Travel Plans, particularly in relation to sustainable travel mode share targets and in some cases, will require an up-front financial contribution to be used to fund requisite additional measures/corrective action.

The PIWG is particularly concerned about the lack of consideration given to the 'cumulative impacts of planned growth' and has doubts as to whether the consideration given is robust. Most notably, the traffic modelling, whilst it has indicated that the site has considered the impacts of planned development in the Local Plan, further developments on Steppingley Road appear to have not been considered. Or at least not stated explicitly. The most notable being the Older People's Accommodation currently under construction, and the planned Crematorium.

Both of these developments will, come 2028, add a further 48 two-way car trips along Steppingley Road in the morning peak hour (8am to 9am) and a further 51 two-way car trips along Steppingley Road during the evening peak hour (5pm to 6pm). The details of this cumulative impact is summarised in the following table.

Whilst the Land South of Steppingley Road has a greater impact on Steppingley Road than both the Older People's Accommodation and Crematorium combined, the cumulative impact is significant. And it is the view of the PIWG that this cumulative impact has not been considered, contrary to Local Plan policy. Although it needs to be stated that this impact will be distributed across the network, the developers own Transport Assessment indicates that the One-o-One Roundabout exceeds its capacity on some approaches in 2028, and that the Tesco roundabout is in excess of 90% of its capacity during the peak hours in 2028.

Table 1 - Cumulative impact of planned developments along Steppingley Road

| | Two-way car trips | |
|--|---------------------------|---------------------------|
| | Morning Peak (8am to 9am) | Evening Peak (5pm to 6pm) |
| Estimated baseline in 2022 ³ | 407 | 322 |
| Older People's Accommodation and Crematorium ⁴ | +48 | +51 |
| Land South of Steppingley Road ⁵ | +106 | +108 |
| Percentage increase resulting from all development | +38% | +49% |
| Percentage increase resulting from Land South of Steppingley Road only | +26% | +33% |

The Framework Travel Plan itself has been identified by the developer as the main means by which the traffic impact of the development will be mitigated. Commitment to these is usually secured through a Section 106 Planning Obligation, and it is concerning that under the draft terms of the Section 106 agreement, the Travel Plan has not been committed to. If the impacts of this development are to be mitigated, and the commitment to sustainable travel is to be compliant with Policy T1, then it must be included as part of the Section 106 Agreement.

A number of concerns have been raised regarding highways safety. The internal road layout and the access points onto Steppingley Road have been designed to the latest highways design standards. The analysis provided by the applicant concerns itself with the number of collisions associated with Slight Injuries, Serious Injuries, and Fatalities. This is in line with best practice for Transport Assessments.

The PIWG has a number of concerns about the safety impact on the highway of this scheme. Of particular concern is the 85th percentile approach speed to the site is in excess of the speed limit of 30mph. Whilst the access junctions have been designed with the higher speeds in mind, an uncontrolled pedestrian crossing is planned outside the site to access the Leisure Centre. Without remediation measures, e.g. chicanes, this can pose a significant safety risk to pedestrians crossing Steppingley Road from this development. Additionally, the width of Steppingley Road, which is below the current best practice width for roads of this type as specified in best practice guidance, is of concern. We would expect that a full Road Safety Audit is needed to understand these issues in more detail, and recommend remediation measures.

The remaining points on transport that the PIWG discussed are primarily concerning opportunities missed by this development, as opposed to anything that is strictly against planning policies. Most notable are the following:

- Improvements to the current hourly bus service between Flitwick, Ampthill, and Milton Keynes that runs along Steppingley Road, with a financial contribution to boost services to at least every 30 minutes;
- Provision of a dedicated cycle track or shared used cycle path along Steppingley Road towards the railway station, providing a safe and convenient route to cycle along this busy road;
- Have every single car parking space fitted with electric vehicle charging infrastructure, in a manner consistent with the emerging Supplementary Planning Document on electric vehicle charging recently consulted upon by Central Bedfordshire Council.

³ Based the average of a 7-day traffic count provided in the application's Transport Assessment

⁴ Based on data provided as part of the Transport Assessments of both applications

⁵ Based on data provided as part of the Transport Assessment for the application

The impact on local services

A matter that the PIWG discussed at length was the impacts of this application on local services, specifically Doctors Surgeries, Dentists, and Local Schools. The PIWG notes that no assessment has been undertaken of the impact of the development on such facilities. However, as part of the Section 106 Heads of Terms contributions towards these services are being offered by the developer of the site, subject to negotiation. This is standard planning practice in most major developments.

As of the time of writing this report, the NHS through the Bedfordshire, Luton, and Milton Keynes Integrated Care Board has requested a contribution towards improving local healthcare facilities should the development go ahead. This is for a total of £476,600 for infrastructure improvements, broken down as £150,600 for GPs, £277,100 for 'acute' services (i.e. hospitals), £22,820 for community services, and £26,080 for mental health services. In their comments, the Integrated Care Board states:

“This application will result in circa 480 additional patient registrations and create a constraint that will require premises reconfiguration, extension or even re-location to create additional clinical capacity.

For this reason, in order to make this development acceptable to NHS commissioners, it is requested that a contribution is made towards Flitwick premises reconfiguration, extension or even re-location to create additional clinical capacity. In addition, the ICB is working with Central Bedfordshire Council regarding a proposed integrated health and care facility in the West Mid Beds area, including mental health and community services and some outreach specialist services from local hospitals, delivering care locally and reducing referrals into hospitals, supporting the delivery of the NHS long term plan. We would therefore request a health contribution towards one or both of these two projects.”

No similar comments have been provided by the Local Education Authority.

In its evidence gathering to support this response, the PIWG was particularly concerned about access to Doctors services and schools. For doctors, [evidence from the Nuffield Trust in 2021](#) shows that the NHS Bedfordshire, Luton, and Milton Keynes CCG has 2093 patients per doctor, one of the highest rates in the country. The [number of patients registered at Highlands Surgery in October 2022](#) was 13,462, with 8 GPs registered at the practice, with up to 4 available at any time.

This gives an indication that current NHS practices in Flitwick are very busy, to the point where it is difficult to book appointments. The understanding of the PIWG is that a key reason for this is the lack of available GPs and staffing issues, as opposed the physical capacity of the building. Something that the evidence indicates towards.

For the local schools, the breakdown of the number of pupils and the capacity at each of the local schools is given below, sources from the [Get Information on Schools service](#) provided by the Department for Education and Skills. This evidence indicates that with the exception of one school, the majority of local schools are highly utilised, including the 3 schools closest to the site (Templefield, Woodland, and Redborne), with this development likely to place further pressures on capacity.

Table 2 - Current use and capacity of local schools

| | Current pupils on roll | Estimated capacity | Current utilisation |
|--------------------------|-------------------------------|---------------------------|----------------------------|
| Flitwick Lower School | 309 | 350 | 88% |
| Kingsmoor Lower School | 178 | 270 | 66% |
| Templefield Lower School | 286 | 300 | 95% |
| Woodland Middle Academy | 660 | 720 | 92% |
| Redborne Upper School | 1418 | 1636 | 87% |

The PIWG considers that the concerns around the impacts on local services is well-founded given the evidence of current utilisation of healthcare and education services. A pressure that is likely to increase as a result of this development, as evidenced by the response of the NHS. It is noted that no significant assessment of the application's impact on local services has been undertaken.

Standard practice in planning is that capacity issues are overcome through the provision of a Section 106 contribution. The PIWG's engagement with Central Bedfordshire Council has indicated that a standard time period of up to 10 years for the spending of this funding is common, although various 'trigger points' for the provision of contributions.

The PIWG has very serious concerns about the impacts of this development on local services, which the evidence has indicated are busy and close to capacity. This concern needs to be expressed in the strongest possible terms to Central Bedfordshire Council, however the PIWG was unable to form a view as to whether this is directly contradictory to Local Plan policy. It is common in planning applications that the impacts of developments are mitigated by way of a Section 106 contribution. Should this application be approved, the PIWG strongly recommends that the following conditions be added to the funds that are released:

- Funding not be ring-fenced for infrastructure improvements (e.g. buildings) but also be considered for the provision of additional staff, such as teachers and GPs;
- Funding for these improvements is released upon the commencement of the construction of the site at the very latest, ideally earlier;
- Funding of these improvements is available for 5 years, so that the delivery of these improvements can be accelerated, and with a commitment to deliver such service improvements in advance of site completion;
- Any funding provided for such improvements is ring-fenced so that it is spent on facilities in Flitwick, with the possible exception of funding for Redborne Upper School

The loss of agricultural land

The PIWG discussed concerns about the loss of high quality agricultural land. There is evidence that the land has been in production of wheat and similar crops for several years, and the loss of farming land is a concern. Of relevance here is Policy DC5 of the Local Plan which states:

Policy DC5: Agricultural Land

Development that would result in the significant loss of Grades 2 and 3a agricultural land will only be permitted where; it can be demonstrated that the location of the proposed development is necessary in order to provide a scheme that is of a valuable public benefit that overrides the need to protect the land. Any development within these areas will need to be supported by an Agricultural Land Classification Assessment.

This application is on Grade 2 Agricultural Land (Very Good) [according to maps published in 2010 by Natural England](#). The question therefore becomes whether this constitutes a significant loss of Grade 2 agricultural land, and whether it has been demonstrated that the location of the proposed development is necessary to provide a scheme that is of a valuable public benefit.

For the former point, this site will result in the loss of quality agricultural land. However, during its deliberations the PIWG was unable to determine whether this a significant loss of agricultural land in the context of Flitwick and the surrounding area. It is a significant development site, but there are a number of areas surrounding Flitwick that are of Grade 2 and Grade 3 quality.

The question of the location of the proposed development being necessary is complicated by the fact that this an allocated development site. So an argument can be made in planning terms that the public benefit of this site has been demonstrated through its adoption as part of the Local Plan. To the PIWG, this is a case of two policies working in opposing ways to one another.

From the review of the documents sent alongside the application, the public benefit argument of the application has not been clearly articulated, even if the PIWG understands the principle of providing new homes locally. Furthermore, no assessment has been provided of the impact Agricultural Land Classification Assessment has been provided that the PIWG is aware of. This would make this development contrary to this policy.

Impact on archaeology

No archaeological assessment has accompanied the application, and no reasons have been put forward by the applicant for this. FLAG raised the matter with the PIWG that this site is likely to have been on a historic Roman Road, although the PIWG has not had the opportunity to investigate this in greater detail. What is known is that the site was the crash site of an RAF Mosquito XVII plane on February 24th 1945, that claimed the lives of Sergeants Jacques L Bonnewit and John Muncaster.

The PIWG would expect that an archaeological assessment be undertaken, ideally prior to the granting of planning permission, but certainly prior to construction of the site. Any archaeological finds should also then be made available for the viewing and enjoyment of the local people.

Contribution towards older people's accommodation

Whilst a Older People's Accommodation is under construction immediately across the road from the site, there is a requirement under the Local Plan for the site to make a contribution towards older people's accommodation. Policy H3 of the Local Plan states that

Policy H3: Housing for Older People

All development proposals for 100 dwellings or more will be required to provide bungalows, level-access accommodation or low-density flats for older people as part of the mix of housing required by Policy H1, unless an alternative approach can be demonstrated to be more suitable having regard to site suitability or viability constraints.

On larger sites of 300 units or more, the provision of an Extra Care Facility will be required, unless an alternative approach can be demonstrated to be more suitable having regard to site suitability or viability constraints. Extra care schemes will be restricted by S106 to ensure that the occupants are those in need of care and support in perpetuity

In discussions with Central Bedfordshire Council, the PIWG was made aware that the Council had not received details on what plots are level access or designed for older people. Nor has any detail of any alternative approach been identified, potentially making the site non-compliant with this policy.

Upon reviewing the designs and details, the PIWG considers that this may be more a matter of clarity being provided as opposed to specific items being excluded. Some the designs make mention of being designed with accessibility and level access in mind, for example.

Other matters considered by the PIWG

In its deliberation of this application, the PIWG did consider the matter of the likelihood of the development proceeding. It is the remit of the PIWG that it should consider all planning applications on their own merits, but it has also been established to secure the best outcomes from the planning system for Flitwick. So as part of this deliberation, the PIWG has considered the implications should the development proceed.

It is the view of the PIWG that the chances of the development being granted planning permission by Central Bedfordshire Council are far from remote. It is an allocated housing site within the Local

Plan. Therefore, it is prudent that specific improvements be requested as part of the development proposals in the event that planning permission be granted.

It needs to be stressed that this does not change the fundamental position of the PIWG that there are material reasons why this application should not be granted planning permission. Nor should our suggestions here be considered as matters that need to be overcome to secure the PIWG's, and potentially the Town Council's, support for the development. These proposed improvements do not overcome these objections, but seek to mitigate the impacts of the development should it proceed.

After due consideration and deliberation, should the development proceed, it is the view of the PIWG that the following improvements be secured:

- Funding for improvements to local services like healthcare and education not be ring-fenced for infrastructure improvements (e.g. buildings) but also be considered for the provision of additional staff, such as teachers and GPs;
- Funding for improvements to local services like healthcare and education is released upon the commencement of the construction of the site at the very latest, ideally earlier;
- Funding for improvements to local services like healthcare and education is available for 5 years, so that the delivery of these improvements can be accelerated, and with a commitment to deliver such service improvements in advance of site completion;
- An archaeological assessment of the site needs to take place in advance of construction proceeding, and any archaeological findings are preserved for the future interest of local people;
- That there is a commitment to ensuring that the development achieves Net Zero carbon emissions, including the installation of solar panels on all buildings (secured by planning condition) and the provision of electric vehicle charging points for each home (secured by planning condition);
- A commitment on behalf of the application to plant trees and border planting in a manner that shields the visual impact of the development, and maintaining this vegetation in an acceptable manner for 10 years in a way that boosts biodiversity;
- Any funding provided for improvements to local services like healthcare and education is ring-fenced so that it is spent on facilities in Flitwick, with the possible exception of funding for Redborne Upper School;
- The Framework Travel Plan, including its funding and the provision of a Travel Plan Co-ordinator, be secured via a Section 106 Planning Agreement;
- A dedicated walking and cycling route, either through a improvements to footpaths and a segregated cycle track or through a shared use path, be provided from the site to the town centre along Steppingley Road;
- Improvements to the Flitwick – Ampthill – Milton Keynes bus service along Steppingley Road to every half an hour be funded for a minimum period of 5 years;
- The planned informal crossing of Steppingley Road for pedestrians become a formalised crossing, either through a Pelican or Toucan crossing, with associated speed reduction measures to reduce the approach speeds for traffic approaching the development site from the roundabout with Fordfield Road.

Furthermore, there may be the opportunity for the Town Council to formally adopt any open spaces and play areas provided as part of the development, similar to the arrangements for the play area on Beaumont Road. Such a decision to adopt such open spaces would need to be made following further discussions with the developer, including the signature of legal and funding agreements, and in all likelihood a resolution from Town Council. The PIWG recommends that, in the event that the application be approved, the Town Council indicates its willingness to discuss matters relating to open space and play areas on the development site.