



Flitwick Town Council

Report to Town Council on 16th January 2024: Land off Trafalgar Drive and Salisbury 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 off Trafalgar Drive and Salisbury Road, on the following grounds

- The site is in designated green belt, and exceptional circumstances to deviate against a presumption against inappropriate development in the green belt has not been demonstrated. This makes the development contrary to the National Planning Policy Framework;
- The proposal does not demonstrate that the highway network could safely accommodate traffic associated with the development, especially at junctions in the town centre, nor does it contain proposals to reduce the amount of traffic associated with the development through demand management measures. This makes this development contrary to the requirements of Policy T1 of the Local Plan.
- The proposal does not take sufficient consideration of the cumulative impacts of developments within Flitwick in assessing the transport impacts of the scheme. This makes this development contrary to the requirements of Policy T1 of the Local Plan.
- The proposal will result in a significant loss of biodiversity on the site, for which insufficient mitigation is proposed. This makes the development contrary to Policy EE2 of the Local Plan.

The Planning Improvement Working Group also notes that in the planning documentation, the presence of the planned nature park off of Maulden Road, being delivered by the Town Council is often referred to, in terms of the planned development either extending the nature park or 'adding value' to it. In its response, the Town Council needs to stress to planners at Central Bedfordshire Council that no such link between this development and the nature park exists, and the nature park is being delivered regardless of the planned development.

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 'Trafalgar Drive,' but formally known Land off Trafalgar Drive and Salisbury Road. Councillors can

view the application documents online on the [Central Beds Planning Portal](#), citing planning application reference CB/23/03861/OUT.

As has been noted in previous meetings of the Town Council, the PIWG has held discussions with Optimis Consulting, the proposed developers planning agents who have been working on the planning application on behalf of the developer (Fielden Homes Limited). It needs to be stressed to the Council that while the agents did share initial concepts on the development of the site, at no time did the PIWG express a view either for or against the development. We asked questions relating to planning matters to gain an understanding of the planned development and its impact. The notes from these discussions can be found on [the Planning pages of the Town Council website](#).

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 133 homes on land behind Trafalgar Drive and Salisbury Road, on fields between the current edge of the town and the nature park currently being delivered off Maulden Road. The description of the planning application is as so:

Residential development comprising the formation of a new access off Trafalgar Drive & Salisbury Road with an extension to the new Flitwick Nature Park with reserved matters for appearance, landscape, layout & scale.

To translate this, this is an outline application that seeks to establish the principle of development on the site and some detail. However, in some areas such as landscaping, design, and the number and type of housing units, this would be subject to more detailed applications at a later date (reserved matters)

The overview map, which also gives an indication of the site's location, is shown below, with site extent outlined in red.



Figure 1 - Site Overview

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.

The Green Belt

The application site is situated in green belt designated in the Central Bedfordshire Council Local Plan. The [National Planning Policy Framework](#), paragraphs 152 and 153, set out planning policy relating to the green belt very clearly:

152. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

153. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

In the application documentation, the applicant seeks to demonstrate that very exceptional circumstances exist by way of two matters:

- The proposed extension to the Flitwick Nature Park mitigating the harm of the development proposals on green belt land, and;
- The challenges that Central Bedfordshire Council has experienced in delivering its 5 year housing supply, justifying permission being given to additional housing developments such as this.

On the first matter, notwithstanding the publicised issues with referring to the planned open area as part of the development as a potential extension of the Flitwick Nature Park, the test within the National Planning Policy Framework is that other considerations ‘clearly outweigh’ the inappropriateness of the development. The presence of this potential extension does not, in the view of the PIWG, outweigh the inappropriateness of developing this green belt site, either on its own or in conjunction with the second matter.

On the matter of challenges in delivering the 5 year housing supply in the Local Plan, in its [5 year housing supply statement](#) from 1st October 2023, Central Bedfordshire Council demonstrates that it has sufficient housing numbers from local plan applications, historic housing commitments, and committed windfall housing developments for 5 and a half years of housing supply. Therefore, the applicant has not demonstrated exceptional circumstances on housing supply.

It is the view of the PIWG that the application is contrary to established green belt planning policy, and the Council should object to the application on this basis.

Transport and access

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 Ampthill 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 one exception to this is the existing mini-roundabout at High Street / The Avenue / Station Road / A5120 Railway Bridge, which the transport assessment identifies as exceeding the practical capacity of the junction (i.e. traffic congestion will get worse);
- The traffic generated is likely to be a significant uplift in the number of vehicles using both Trafalgar Drive and Salisbury Road / Canterbury Road. But when it meets Ampthill Road, the traffic is likely to disperse both north and south
- There are no significant safety issues 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 southern edge of the site that will be improved, and there is a cycle route nearby along Windmill Road. The transport assessment states that the site is within walking distance of local buses on Ampthill Road
- The site is some way from local services, with most of 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.

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.

Similar to our comments on Land south of Steppingley Road, 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 in Flitwick appear to have not been considered. Or at least not stated explicitly. The most notable being Aldi, the Crematorium, and the impact of development along Steppingley Road.

This additional impact is not insignificant. Table 1 shows calculations used for comments on Land south of Steppingley Road, which we still consider to be valid for this application. The point being is that, as presented in the Transport Assessment, the cumulative impact of planned development appears to be underestimated.

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 ¹	407	322
Older People’s Accommodation and Crematorium ²	+48	+51
Land South of Steppingley Road ³	+106	+108
Percentage increase resulting from all development	+38%	+49%

¹ Based the average of a 7-day traffic count provided in the application’s Transport Assessment

² Based on data provided as part of the Transport Assessments of both applications

³ Based on data provided as part of the Transport Assessment for the application

Percentage increase resulting from Land South of Steppingley Road only	+26%	+33%
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Regarding the existing mini roundabout at High Street / The Avenue / Station Road / A5120 Railway Bridge, the applicant states that this is not a material consideration as, assuming there is no development, this junction would be over capacity (i.e. congested) in 2028. And with the development, it adds additional traffic to what would be an already congested junction. Even assuming you accepted this argument, this would necessitate the developer providing improvements to this junction as the development would make the situation worse.

The PIWG has a number of concerns about the safety impact on the highway of this scheme. Of particular concern is the impact on Salisbury Road, Trafalgar Drive, and to some extent Canterbury Road. These are residential roads designed for low traffic volumes, and increases in the number of vehicles, and especially in construction vehicles, are likely to have safety implications for vulnerable road users. We would expect that a full Road Safety Audit is needed to understand these issues in more detail, and recommend remediation measures.

Impact upon wildlife and biodiversity

The PIWG has received comments from local residents about sightings of various species on the development site spotted during walks. This includes Jays, Great Crested Newts, Muntjack Deer, and Skylarks. Therefore, the impacts of the development site on biodiversity and the ecology of the area is of particular interest to the PIWG.

The Ecological Report and Biodiversity Technical Note gives the PIWG some cause for concern. Firstly, the results of this assessment is partly based upon ecological surveys that took place in 2014 and 2018. This gives the PIWG great concern that the evidence supporting the assessment is outdated and does not accurately reflect the position of the ecology of the site.

Where up-to-date surveys have been undertaken, they recognise that the application site, which is connected to surrounding grasslands, scrub land, mature Wooded areas, ponds, rivers and watercourses provides an extremely diverse habitat for countless different species of birds, bats, mammals and invertebrates. The Ecological Report acknowledges that the proposed housing development to the southern end of the site will result in virtually all scrubland/grassland vegetation and habitat being lost with a consequential high risk to the existence of protected species on both the Red and Amber list.

The most significant finding, however, is the impact of the development on biodiversity. This report concludes that the development will result in a 74.5% loss in natural habitat and bio-diversity and that such losses cannot be recovered within the development. As such, this loss would need to be mitigated by works to boost biodiversity elsewhere funded by the developer, which are not specified in the analysis.

Policy EE2: Enhancing Biodiversity in the Local Plan is clear on the position relating to developments and biodiversity:

Development proposals will be permitted where they avoid negative impacts on biodiversity and geodiversity. Where this is not possible, proposals must mitigate unavoidable impacts and, as a last resort, compensate for residual impacts; delivering a net gain in biodiversity by:

1. *Incorporating and enhancing existing and creating new biodiversity features within their design; and*
2. *Maximising opportunities to enhance and create links between ecological networks and habitats of principal importance. Links should be created both on-site and, where possible, with nearby features.*

It is the view of the PIWG that the development will have a significant adverse impact on the biodiversity of the site, and there is insufficient mitigation for the significant loss of biodiversity resulting from this development. This makes this development clearly contrary to the Local Plan.

Impact upon the landscape

Understanding the impact of developments on landscape can be somewhat subjective. It should be noted that while the change between the current site to housing will have a visual impact, the site itself is not located within any areas in the Local Plan designated as having specific landscape value. Regardless of this, the developer has undertaken a landscape assessment of the site.

A particular challenge with this assessment is that, while elevations and designs of the housing to be provided are included within the plans, final details on these elevations and the mix of types of housing is proposed to be decided by a later, more detailed application. While in relation to the decision that needs to be made on this application undertaking such an assessment now is within planning rules, the results need to be treated with some caution.

To summarise the results of the landscape assessment as succinctly as possible, there will be a permanent change in the use of the site from green belt land to residential, garden land and public open space. There will be a permanent loss of or alteration to large areas of the existing landscape within the site, and some landscape elements will be lost during construction, mainly a belt of trees including Leyland cypress and Poplars. For the immediate adjacent residents, there will be a higher impact on the character of the area. Consequently, the landscape assessment concludes that:

“The landscape character will be affected permanently adversely in the early years but lessening over the longer term...As a result the assessed magnitude of change for landscape character is assessed as ‘medium.’”

It is the view of the PIWG that the impact of the development in its immediate vicinity in terms of landscape will be significant, something recognised in the landscape assessment.

It should be noted that when it comes to planning applications, Policy EE5: Landscape Character and Value of the Local Plan very much favours development proposals that take steps to have regard to local landscape character and seek to mitigate the impacts of the development in landscape terms. This includes the following:

“In order to safeguard intrinsic character, scenic beauty and perceptual qualities of the landscape such as tranquillity, all development proposals will need to have regard to the key characteristics and sensitivities of the site and its setting, as set out in the Central Bedfordshire Landscape Character Assessment.

All major development proposals will be required to demonstrate how they incorporate landscape enhancement, in accordance with the guidelines in the LCA, the Central Bedfordshire Design Guide and other relevant documents for specific areas. This includes the Chilterns AONB, Forest of Marston Vale and the Greensand Ridge Nature Improvement Area. Landscape and visual appraisal will be expected to support planning applications and, include the assessment of local landscape character and views.”

Accordingly, while it is the view of the PIWG that the landscape impact of the development is likely to be more significant than that presented, the landscape impacts of the development could be mitigated by appropriate conditions on the scale of the buildings, building materials, and screening using vegetation.

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 PIWG has not seen any comments from providers of local services to this development.

In its evidence gathering to support this response and previous planning application responses, 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, 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

Contribution of affordable housing

The development comprises a mix of homes to be sold at a market value, and socially rented accommodation, the latter of which is considered in policy to be a contribution in terms of affordable housing. The overall provision of housing units is broken down as so:

- 57 socially rented units
- 133 market units

Therefore, 30% of the units to be provided on the development site are affordable housing. Policy H4: Affordable Housing in the Local Plan states the following:

“All qualifying sites of 10 or more units will provide 30% affordable housing. The affordable housing from qualifying sites should be provided on-site.”

The current application complies with that requirement.

It should be noted that for both the market housing the affordable housing, no breakdown is given in terms of proportions of each by the size of the unit. In other words, the applicant has not revealed how many one bedroom, two bedroom, three bedroom etc. homes there are on the site, referring in the application to all the units as ‘unknown bedroom.’

A further consideration is whether the provision of this level of affordable housing provides an exceptional circumstance to deviate from established green belt policy. The text of the Local Plan, though it needs to be stressed that this is not a policy of the Local Plan, states that the supply of affordable housing on rural exception sites is seen as important, not just in order to provide homes for those in greatest need, but to help keep balanced communities. There is a need for affordable housing in the Green Belt settlements and Central Bedfordshire will consider favourably the provision of affordable housing on rural exception sites in the Green Belt.

It is the view of the PIWG that this consideration does not apply to this site. This is because rural exception sites are tightly defined in the Local Plan, including generally being less than 10 homes in size and providing only a limited amount of market housing.

Provision of accommodation for older people

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

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.

Final considerations

A matter that was subject to a lot of discussion to the PIWG was the direct impact of the development on the Nature Park. Unlike many other developments across Flitwick, if permitted this development would have a significant and immediate impact on a Town Council project – the delivery of the Nature Park itself.

The PIWG cannot, at this stage, recommend a course of action for the Town Council to take in the event that the application be permitted. This would need to be subject to a wider discussion within the Town Council, including discussion at relevant committees. What the PIWG can do at this stage, however, is establish potential options should this happen. It is our view that these include the following that would be actioned after planning permission is secured:

- Discuss with the developer options for the part of the development site to, in effect, be an extension of the Nature Park, including discussion of appropriate matters like park management and land ownership;
- Discuss with the developer options for financial contributions towards the delivery of the Nature Park and potential future improvements, that may be contained within the plan for the Nature Park;
- Do nothing.

The PIWG does not recommend any specific action, as there are many aspects to this decision outside of its remit. It is simply stating that, in purely planning terms, these are potential options for the Town Council to consider at a later stage.

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 it is unlikely that the development will be granted planning permission by Central Bedfordshire Council. However, in the unlikely situation that permission be granted, 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;

- A full biodiversity assessment of the site needs to take place in advance of construction proceeding, and any recommended improvements to meet the requirements of biodiversity net gain are funded in full by the developer;
- 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;
- Safety and capacity improvements to local junctions, especially the junction of High Street / The Avenue / Station Road / A5120 Railway Bridge, be identified and funding secured for their delivery in advance of the development taking place;
- 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;
- The planned contribution of 30% of housing units being affordable homes is secured through a planning obligation.