

Item No. 10

APPLICATION NUMBER	CB/16/03378/FULL
LOCATION	Co-op Supermarket, High Street, Houghton Regis, Dunstable, LU5 5QT
PROPOSAL	Phased Construction of a new Independent Living Scheme for Older Persons comprising 168 apartments with support facilities, a Restaurant & Bar, Retail Units, Cafe, 2no Reablement Suites, the conversion and Change of Use of a Grade 2 listed building and the demolition of an existing Sheltered Housing scheme with associated parking and landscaping.
PARISH	Houghton Regis
WARD	Houghton Hall
WARD COUNCILLORS	Cllrs Mrs Goodchild & Kane
CASE OFFICER	Peter Vosper
DATE REGISTERED	12 August 2016
EXPIRY DATE	11 November 2016
APPLICANT	Central Bedfordshire Council
AGENT	Kyle Smart Associates
REASON FOR COMMITTEE TO DETERMINE	Central Bedfordshire Council is the applicant
RECOMMENDED DECISION	Full application - Recommended for Approval

Reason for recommendation:

There is an identified need for additional housing in the district of Central Bedfordshire and a specific need for independent living accommodation for older people. The proposed development would be a prominent building designed to create a landmark structure in the centre of Houghton Regis. For reasons discussed in the report it is considered that, although there would be adverse impacts arising from the development, including car parking facing on to The Green and the loss of trees, these would be mitigated, and the benefits of the scheme, including the need for the specified type of housing, the creation of a landmark building on a largely vacant town centre site, an improved retail offer, and a development that enhances the town centre, would significantly and demonstrably outweigh the adverse impacts.

Site Location:

The 1.46 hectare application site is in Houghton Regis town centre, and the eastern section is in the Houghton Regis Conservation Area. It was developed previously with houses and small commercial buildings including a smithy in the north and east of the site prior to 1880 until the 1960s/1970s when the majority of these buildings were demolished, with the exception of The Red House, a Grade II Listed Building.

Sheltered accommodation (Red House Court) was built in the south east corner of the site in the late 1970s and extended to the south west in the late 1990s.

A Co-op supermarket and Community Centre was built in the north of the site, with associated car parking in the south west in the early 1980s but was demolished in 2005 following a large scale fire. Since then, a smaller store operated until early summer 2014, and a social club used temporary portacabins on part of the site.

The site returned back into the full ownership of Central Bedfordshire Council in 2015 and the vacant areas of the site are currently enclosed by timber hoarding.

The Red House, which was formerly part of the Council's housing stock, is presently vacant. Red House Court is still occupied and contains 33 sheltered housing flats.

Vehicular access into the site is from the High Street via a four-arm roundabout which also links into The Green and Tithe Farm Road. The site is relatively flat, although there is a slight slope of around 1.5m from the north west to the south east. The site contains 37 individual trees and five groups of trees, most of which are located near to the site boundaries and in the north eastern part of the site.

The area around the site contains a variety of land uses. Immediately to the north is Bedford Square shopping centre, comprising shop units on the ground floor with flats above. To the north west is All Saints Church which is Grade I listed, originating from the 14th century. To the north east are detached and semi detached residential properties on the High Street.

To the west, positioned at the junction of the High Street and Whitehouse Close, is Rosalyn House, a 46 bedroom care home. Whitehouse Close and Clarkes Way, to the south, contain residential properties, varying in type. To the south east there is a public open space containing a children's playground. There is a large green open space known as The Green to the east of the site. Running along the western edge of The Green is Redhouse Court Road. Located at the end of this road is Houghton Hall, a late 17th century building which is Grade II* listed.

There is an existing unofficial pedestrian route through the site which enters via Clarkes Way to the south and provides a connection to the High Street to the north.

The Application:

Full planning permission is sought for a new Independent Living Scheme for Older Persons comprising 168 apartments. Independent Living Schemes are sometimes referred to as Extra Care and are intended for people who are aged 55 or over who may or may not require care. The 168 units would comprise 84 affordable rent apartments (79 x one-bedroom and 5 x two-bedroom), 57 shared ownership apartments (30 x one-bedroom and 27 x two-bedroom), and 27 apartments for outright sale (1 x one-bedroom and 26 x two-bedroom).

Also proposed are six retail units, and communal facilities including a cafe, restaurant, lounge, multi-purpose rooms, hobby rooms, assisted bathing facilities, treatment rooms, and two re-ablement suites.

The Grade II Listed Red House would be converted and its use changed to a multi-purpose facility at ground floor, offices at first floor and storage at second floor.

The proposal would be designed as a single building shaped as a figure of eight and would range from single storey to five storey. The highest part of the development, fronting the High Street, would be 16.45m high. External landscaped areas would be provided.

The scheme would include 106 car parking spaces. Vehicular access would be provided from the High Street and from Clarkes Way. A public footpath between Clarkes Way and the High Street would be retained.

The existing Sheltered Housing building, Red House Court, would be demolished to facilitate the new development.

Relevant Policies:

National Planning Policy Framework (NPPF) (March 2012)

Achieving sustainable development

Section 1: Building a strong, competitive economy

Section 2: Ensuring the vitality of town centres

Section 4: Promoting sustainable transport

Section 6: Delivering a wide choice of high quality homes

Section 7: Requiring good design

Section 8: Promoting healthy communities

Section 11: Conserving and enhancing the natural environment

Section 12: Conserving and enhancing the historic environment

South Bedfordshire Local Plan Review Policies

Policy BE8: Design Considerations

Policy T10: Controlling Parking in New Developments

Policy H3: Meeting Local Housing Needs

Policy TCS1: Sustaining and Enhancing the District's Town Centres

Policy TCS3: Houghton Regis Town Centre

Policy TCS5: Houghton Regis Town Centre Enhancement

The NPPF advises of the weight to be attached to existing local plans for plans adopted prior to the 2004 Planning and Compulsory Purchase Act, as in the case of the South Bedfordshire Local Plan Review. Due weight can be given to relevant policies in existing plans according to their degree of consistency with the Framework. It is considered that Policies BE8 and H3 are broadly consistent with the Framework and carry significant weight. Policies T10, TCS1, TCS3 and TCS5 carry less weight but are considered relevant to the proposal.

Development Strategy

At the meeting of Full Council on 19 November 2015 it was resolved to withdraw the Development Strategy. Preparation of the Central Bedfordshire Local Plan has begun. A substantial volume of evidence gathered over a number of years will help support this document. These technical papers are consistent with the spirit of the

NPPF and therefore will remain on our website as material considerations which may inform further development management decisions.

Supplementary Planning Guidance/Other Documents

Central Bedfordshire Design Guide, March 2014

Affordable Housing: Guidance Note for Central Bedfordshire (South Area), 5 April 2016

Houghton Regis Town Centre Masterplan Supplementary Planning Document (SPD), 2008

Central Bedfordshire Sustainable Drainage Guidance, April 2014

Relevant Planning History:

Application Number	CB/16/01922/SCN
Description	EIA Screening Opinion: Construction of new Independent Living Scheme for Older persons comprising 167 apartments with support facilities, a restaurant & Bar, 6 no retail units, a cafe, 2 no re-ablement suites, the conversion and change of use of a grade 2 listed building and the demolition of an existing sheltered housing scheme
Decision	Environmental Impact Assessment not required
Decision Date	8 July 2016

Application Number	SB/08/00214/FULL
Description	Siting of a temporary building for use as a library
Decision	Conditional planning permission
Decision Date	14 July 2008

Application Number	SB/06/01165/FULL
Description	Temporary siting of single storey building for use as social club (pending replacement of building demolished following fire)
Decision	Conditional planning permission
Decision Date	23 November 2006

Application Number	SB/03/00007/LB
Description	Stripping and Replacement of Roof Tiles (The Red House)
Decision	Conditional Listed Building Consent
Decision Date	28 May 2003

Consultees:

Houghton Regis Town Council	Comments: No objections in principle. However, the following concerns were expressed.
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1. The effect the height of the building would have on the general outlook of the area, but in particular on some of the residents of Whitehouse Close.
2. As the residents of the building will be elderly,

improvements would need to be made to facilitate an easier crossing of the High Street, i.e. controlled crossing.

3. Concerned that there does not appear to be a report from English Heritage within the documents.

4. The Town Council would like to see proof that CBC does indeed own the access road adjacent to Red House Court and The Red House.

Highways
(Development
Management)

The proposal is for 167 independent living apartments and 963 Sq.m of retail space (which is assumed to be none food) with 107 parking spaces.

In accordance with the authority's parking standard in the Central Bedfordshire Local Transport Plan; Appendix F the standard for retirement homes is 1 space per unit plus 1 space for every 4 units for visitors. This brings the total to 220 spaces for the residential portion of the proposal while as the documents states that a discount for the commercial would warrant a parking provision for an additional 19 spaces. Clearly this standard has not been met and the standard does not permit discounting for residential use. However, there is not a standard for this type of development and while I am disappointed that the applicant had not taken my advice and carried out surveys to determine the usage at the existing site I am mindful that the usage is not going to be as high as that as private dwellings.

The proposal along the Easterly boundary encroaches into the public highway including the widening of the access road. While I would not object to the stopping up of public highway this is not part of the application. Further, the Highway Authority may very well object to some of the landscaping elements shown. There are three options as follows:-

- While this is an issue which will need to be addressed I do not see why this matter should not be dealt with by way of condition.
- I do not agree with a number of issues within the Transport Statement for instance reference is made that there is good local public car parks within the area available for use by the development. I take exception to this statement as a survey of these car parks are not identified and indeed the statement goes on to say that they are not required.
- Within the TS there is evidence that a refuse vehicle and articulated vehicle can both take access to the undercroft parking and carry out any servicing required. These vehicles measure 3.8 and 4.0m high respectfully while the clearance into this undercroft area only

measure, 3.8m. It would be reasonable to conclude that the vehicles that are required to service this site will be unable to access the service area. Before permission is given this matter will need to be addressed by the applicant.

- The access from Clarkes Way only benefits from a headroom of 2.6m, so neither a Light Goods Delivery vehicle or ambulance could take access. As a result deliveries to this area will be from the kerb side. Further, there are a number of parking bays taking access along this road so where ever a delivery vehicle parks it will be causing an obstruction. This matter needs further consideration.
- Further the refuse bins will also need to be emptied by parking the refuse collection vehicle on Clark's Way. Considering the distance and number of refuse collection containers there are, this operation to empty these bins could take anything between 45 and 90 minutes, Again this will need further consideration.
- Putting these matters aside and on the understanding that there is a general acceptance of the issues I highlight above I am content to make a recommendation that on Highway grounds, permission should not be withheld.

Subsequently, in a highway context I recommend that the following conditions be included if planning approval is to be issued:

Development shall not begin until details of the alteration on the public highway have been approved by the Local Planning Authority and no building shall be occupied until that junction has been constructed in accordance with the approved details.

Reason

In order to minimise danger, obstruction and inconvenience to users of the highway and of the proposed estate road.

Before the new accesses are first brought into use, any existing accesses within the frontage of the land to be developed, not incorporated in the access hereby approved shall be closed in a manner to the Local Planning Authority's written approval. (HC 19)

Reason

In the interest of road safety and to reduce the number of points at which traffic will enter and leave the public highway.

The development shall not be occupied until a residential travel plan has been submitted to and approved in writing by the Council, such a travel plan to include details of:

- Predicted travel to and from the site and targets to reduce car use.
- Details of existing and proposed transport links, to include links to both pedestrian, cycle and public transport networks.
- Proposals and measures to minimise private car use and facilitate walking, cycling and use of public transport.
- Timetable for implementation of measures designed to promote travel choice.
- Plans for monitoring and review, annually for a period of 5 years at which time the obligation will be reviewed by the planning authority.
- Details of provision of cycle parking in accordance with County Council guidelines.
- Details of marketing and publicity for sustainable modes of transport to include site specific welcome packs. Welcome packs to include walking, cycling, public transport and rights of way information.
- Details of the appointment of a travel plan co-ordinator.

No part of the development shall be occupied prior to implementation of those parts identified in the Travel Plan [or implementation of those parts identified in the Travel Plan as capable of being implemented prior to occupation]. Those parts of the approved travel plan that are identified therein as being capable of implementation after occupation shall be implemented in accordance with the timetable contained therein and shall continue to be implemented as long as any part of the development is occupied.

Reason

To reduce reliance on the private car by promoting public transport and sustainable modes of transport.

The maximum gradient of all vehicular accesses onto the estate roads shall be 10% (1 in 10).

Reason

In the interests of the safety of persons using the access and users of the highway.

Before the premises are occupied all on site vehicular areas shall be surfaced in a manner to the Local Planning Authority's approval so as to ensure satisfactory parking of vehicles outside highway limits. Arrangements shall be made for surface water from the site to be intercepted and disposed of separately so that it does not discharge into the highway.

Reason

In order to minimise danger, obstruction, and inconvenience to users of the highway and of the premises.

Before development begins, a scheme for the parking of cycles on the site shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall be fully implemented before the development is first occupied or brought into use and thereafter retained for this purpose.

Reason

To ensure the provision of adequate cycle parking to meet the needs of occupiers of the proposed development in the interests of encouraging the use of sustainable modes of transport.

Development shall not commence until a scheme detailing provision for on site parking for construction workers for the duration of the construction period has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented throughout the construction period.

Reason

To ensure adequate off street parking during construction in the interests of road safety.

Furthermore, I should be grateful if you would arrange for the following Notes to the applicant to be appended to any Consent issued :-

The applicant is advised that the requirements of the New Roads and Street Works Act 1991 will apply to any works undertaken within the limits of the existing public highway. Further details can be obtained from the Central Bedfordshire Council's Highway Help Desk, P.O.Box 1395, Bedford, MK42 5AN.

The applicant is advised that in order to comply with Condition ... of this permission it will be necessary for the developer of the site to enter into an agreement with the Highway Authority to ensure the satisfactory completion of the associated road improvements.

Trees and Landscape I have examined the plans and documents associated with this application, namely the Arboricultural Impact Assessment (Stage 1 and 2 Arboricultural Report) prepared by RSK Environment dated July 2016, and site plans.

To put the scale of tree removal into context, it should be noted that of the 37 individual trees and five groups of trees

surveyed within the site, this application will involve the removal of 23 of these individual trees and 4 of these groups of trees, both in order to facilitate development, and to allow working space for demolition and construction. It should also be recognised that many of these trees are of a "B" quality rating that make a significant contribution to the existing locality and character of the Houghton Regis Conservation Area.

Also of concern is that those trees being retained are all on the periphery of the site, and many are being incorporated into areas where there will be severe incursions into their Root Protection Areas, and where the potential for root disturbance will be high given the proximity of trees to proposed changes in surface treatments. Significant pruning will also be required to accommodate their canopies into the development layout, and subsequently there will then be repeated requests for future tree pruning once the pressure of occupancy comes to bear, leading to disfigured trees of lower amenity value.

This suggests to me that the site is being overdeveloped at the expense of acceptable tree retention, and is likely to have an adverse impact on the character of the Houghton Regis Conservation Area, which as a Local Authority, sets a bad example to the wider public when we are currently striving to protect our Conservation Areas from tree loss due to development.

For this reason I could not support such a large scale of tree loss as being indicated with this scheme, and therefore object to the application on the basis that such tree loss will have an adverse impact on the visual amenity provided by existing treescape.

Conservation and Design

The application site occupies a prominent corner plot with aspects both on The Green (where the site is within the boundaries of the designated Houghton Regis Conservation Area) and High Street (outside the Conservation Area but part of the townscape setting of the Grade I Listed Parish Church of All Saints). Beyond this 'strategic' historic environment significance, the application site includes the Grade II Listed Red House, a distinctive traditional property representing historic settlement around the edges of The Green. Roughly half of the application site lies within the designated Conservation Area.

The proposed redevelopment of this site, an independent living development of 168 apartments, restaurant and bar, café and retail units is a strident architectural departure for Houghton Regis. Initial Scheme design benefitted from direct pre-application discussion with Historic England, and further Historic England and CBC involvement has resulted in minor

design changes responding specifically to historic environment issues.

In view of this achievement, and the potential high 'public benefit' deliverable through the Scheme, I am happy for Permission to be granted with the following Conditions and Informative attached:-

(recommended Conditions and Informative)

Reason for Conditions: To ensure that the development is carried out in a manner that safeguards the historic significance and traditional character of the site's listed buildings and to safeguard the character and appearance of the Conservation Area and its immediate setting of which the site is part.

(standard – Case Officer to add) external material samples - a full suite of external materials for the development is required, including windows, doors, RWG and hard landscape materials

(standard - Case Officer to add) external finishes schedule (for complete development)

(Enclosure walling - recommended Condition):

- Notwithstanding the details submitted with the application, and prior to commencement of the constructional phase of the development hereby approved, details of the following in respect of all proposed new and/or altered boundary enclosure structures shall be submitted to and approved in writing by the Local Planning Authority and the approved development shall be undertaken thereafter strictly in accordance with the approved details-

- (brick wall and wall-top railings) - drawn elevation detail at 1:10; drawn elevation and layout plan at 1:50

- (Red House garden wall) – drawn detail at a scale between 1:10 and 1:20 in elevation and section, showing the method of the formation of the proposed decorative brick arch gate opening

- Masonry wall details, including coping type, brickwork bond and mortar jointwork finishing

- Notwithstanding the details submitted with the application, full details of all new gates, timber and metal bollards and exterior lighting installations proposed to be installed as part of the development hereby approved shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of development on site, and the approved development shall thereafter be implemented strictly in

accordance with the approved details..

(Cobbled hard landscape surfaces) - method statement and sample panel

- Notwithstanding the details submitted with the application, and prior to commencement of the constructional phase of the development hereby approved, a method statement and specification detailing fully the proposed method of construction of the proposed natural stone cobble/river washed pebble hard landscape surfacing hereby approved shall be submitted to and approved in writing by the Local Planning Authority and the approved development shall thereafter be implemented strictly in accordance with the approved details..

- Notwithstanding the details submitted with the application and prior to the laying out of the cobbled hard landscape surfaces hereby approved, a finished sample section demonstrating clearly the materials to be used (including edgings and representative cobbles/pebbles) and the manner of surfacing bedding and finishing, shall be constructed on site, and retained, for agreement in writing by the Local Planning Authority, and the approved works shall be implemented thereafter in strict accordance with the approved details.

(Informative):

1. (Explanation of terms used) For the complete avoidance of doubt, both applicant and applicant's agent should be advised that the use of the term 'external' in the Conditions attached to this Permission is taken to refer to the true external envelope (ie outside walls as existing) of the building(s) that occupy the site prior to incorporation within the Scheme of development hereby approved.

SuDS Management
Team

Our position and reason for position

We consider that planning permission could be granted for the proposed development subject to the final surface water drainage design being submitted and approved by the planning authority before construction is commenced.

The final detailed design must address the following concerns outlined in this response:

1. Restriction of run off rates: The proposed site has been previously developed. The peak runoff rate for the 1 in 1 year rainfall event and the 1 in 100 year rainfall event must therefore be as close as reasonably practicable to the greenfield runoff rate for the same rainfall event, but should never exceed the rate of discharge from the development prior

to redevelopment for that event. This in accordance with *Standard 3 of the 'Sustainable Drainage Systems Non-statutory technical standards for SuDS', Defra March 2015*. Existing discharge rates and volumes have not been provided as a comparison to the proposed and it has not been demonstrated that the proposed rate of 5l/s does not exceed the greenfield run off rate for the development, or has been restricted to provide a betterment of the existing brownfield runoff rate, and we therefore find it unacceptable on these grounds.

2. Outfall and control structure: We also find the statement that *'flow control mechanisms for lesser rates are prone to blockage unacceptable'* and that this does not justify an approach which does not mitigate flood risk appropriately. Guidance states that the minimum recommended size for the opening to Hydro-Brake should be not less than 75mm, correspondence with manufacturers also suggest that, in some cases, a Hydro-Brake may have an opening size of <40mm to restrict to a lower outflow rate.

It is unclear who will be responsible for the future maintenance of the control structure, adoption by Anglian Water would further reduce the risk of blockage through regular, planned maintenance by the authority. Details would need to be provided with the final detailed design to demonstrate how the surface water drainage system, in its entirety, shall be maintained and managed after completion. This will be for the lifetime of the development to ensure the features remain functional.

3. Storage and attenuation: Provision of surface water run-off attenuation storage must accommodate the difference between the allowable discharge rate/s and all rainfall events up to the 100 year (plus allowance for climate change) critical rain storm and will comply with national standard S7 & S8 (*Defra March 2015*). It is not clear how the indicative volume required for attenuation has been determined, and must be provided with full calculations at the detailed design stage. Subject to any changes to the final discharge rate, the indicative attenuation figure provided will need to be revised. The final detailed design of all attenuation features should demonstrate half-drain within 24 hours and fully drain within 48 hours, to ensure that there is sufficient capacity retained within the drainage system for subsequent rainfall events. The area draining to a geo-cellular tank should be as small as practical, however this is not the case with the proposed drainage approach. Opportunities for temporary storage across the site should be maximised. This should integrate wider site objectives for the treatment of water quality and the

opportunity to provide betterment of the current frequency, rate and volume of surface runoff, both for day-to-day rainfall as well as for the more extreme events, through the use of SuDS in sequence.

The FRA states that 1010m² of the 6542m² roof area proposed will consist of green roof. It is unclear from the drainage plans provided where this is located and how it will integrate with the wider system. Details of the layout, function, construction and proposed arrangements for future maintenance must be provided with the final detailed design for the drainages system in its entirety.

4. Water quality and treatment: The proposed drainage approach relies on modular geo-cellular systems, which do not have inherent treatment capability and therefore require integration with a site wide surface water treatment strategy. Upstream treatment has not been proposed and must be demonstrated with the final detailed design, as well as details to deliver section 5.30 of the FRA which states that at least 2 treatment stages are required in accordance with the Ciria SuDS Manual.

5. Exceedance management: The final detailed design must demonstrate management of exceedance and ensure overland flows are accounted for, in case of a more extreme storm event than the design event or a failure of an element of the drainage system. A plan showing proposed exceedance routes should be submitted with the final detailed design and should be informed by the survey of the existing drainage network to ensure any localised flooding or weaknesses in the wider drainage system can be addressed, where appropriate.

Flood resilience of individual buildings should be considered to reduce the risk of flooding from system exceedance or failure with the final detailed design. Given the likelihood for exceedance flows to affect High Street and Redhouse Court details must be provided for the final finished floor levels, these should be set 300mm above the design water level in any local foul, combined or surface water drainage system, and 150mm above local ground levels to minimise flood risk.

6. Compliance with CBC adopted SuDS requirements: While it is to be commended that the developer has considered SuDS early in the development process, the approach as proposed fails to meet CBCs local requirements in a number of ways (*Sustainable Drainage Guidance, Adopted April 2014, Updated May 2015*).

It does not maximise opportunities to enhance biodiversity, it does not result in multi-functional SuDS, it creates a system that is not easy to maintain due to its accessibility, it does not create a sense of place, and it fails to reduce reliance on pipes and pumps by managing water on the surface. Details of how SuDS integrate with wider site objectives for amenity, biodiversity and water quality should be provided with the detailed design and demonstrate compliance with the Council's SuDS SPD. SuDS should be used in sequence as part of a management train in the final detailed design and should address issues identified in this response associated with a lack of treatment of surface water, storage attenuation and the rate of discharge of surface water off site.

We therefore recommend that the following conditions be attached to any permission.

Condition 1

No development shall take place until the detailed design for the surface water drainage for the site and associated details of its proposed management and maintenance have been submitted to and approved in writing by the Local Planning Authority. The final design shall be based on sustainable drainage principles and a site-specific assessment carried out in accordance with BRE Digest 365, and shall include provision of attenuation and a restriction in run-off rates to replicate greenfield conditions or provide betterment of the existing drainage regime. The approved drainage system shall then be implemented in accordance with the approved detailed design and shall be managed and maintained thereafter in accordance with the agreed management and maintenance plan.

The scheme shall be compliant with the 'Non-statutory technical standards for sustainable drainage systems' (March 2015, Ref: PB14308), 'Central Bedfordshire Sustainable Drainage Guidance' (Adopted April 2014, Updated May 2015), and recognised best practise including the Ciria SuDS Manual (2016, C753); and will include the following:

- Clear details of the existing and proposed impermeable areas and run off rates.*
- Full detailed calculations using FEH rainfall data showing the simulated rainfall storms for the 1 year, 30 year, 100 year and 100 year plus climate change;*

- *Detailed plans and drawings showing the proposed drainage system in its entirety, including location, pipe run reference numbers, dimensions, gradients and levels (in metres above Ordinance Datum). This shall include all elements of the system proposed, including source control, storage, flow control and discharge elements;*
- *Details of flow control measures to be used, demonstrating that runoff rate and volume will not exceed greenfield rates where practicable;*
- *Full calculations of the attenuation storage volume required including allowances for climate change, based on the simulated rainfall runoff and the agreed post-development discharge rates;*
- *Flooded areas for the 1 in 100 year storm when system is at capacity, demonstrating flow paths for design for exceedance.*
- *Resilience and resistance of individuals to flooding, including finished floor levels.*
- *Integration of the drainage system with wider site objectives, including water quality treatment, amenity, biodiversity and Amenity.*
- *Details of the structural integrity, proposed construction of the system, and any phasing of works.*
- *Full details of the provision of access for maintenance and the proposed responsible parties for maintaining and/or adopting surface water drainage, for the entire drainage system. Including any proposed split of the surface water management system and/or maintenance responsibilities between private (i.e. within curtilage) and public (i.e. in public open space and/or highway).*

Reason 1

To ensure the approved system will function to a satisfactory minimum standard of operation and maintenance. The applicant should address the following concerns when submitting details to discharge the condition.

Condition 2

No building shall be occupied until a 'Management and Maintenance Plan' for the entire surface water drainage system, demonstrating that all surface water management structures and facilities shall be maintained in perpetuity to assure that the structures and facilities function as originally designed.

Reason 2

To ensure that the implementation and long term operation of a sustainable drainage system (SuDS) is in line with what has been approved, in accordance with Written Statement - HCWS161

Public Protection

Topics considered:

Air Quality
Contaminated Land
Noise
Light
Odour

Noise:

Road Noise:

The report recommends that mitigation is required against road traffic for some of the development, mitigation through the building fabric for internal noise between the commercial and residential units and recommends noise limits for external plant installed as part of this project. There is also a recommendation to seek to manage noise from deliveries/service vehicles arriving and leaving the commercial aspect of the development. Conditions to address these areas have been recommended below.

Plant noise from commercial units:

Limits have been recommended for plant affecting the residential premises facing the High Street and for residential units at other locations on the site. A condition has been recommended below which requires these limits to be achieved.

Internal noise from commercial premises:

The noise report submitted advises that internal noise transmission between the as yet unknown commercial uses and residential units can be controlled via construction methods. To this end I have recommended a condition based

on this conclusion.

Contamination:

The land contamination report recommends that further investigations (intrusive) are made to fully establish the extent of any contamination. Further to this a recommended condition is also set out below.

Other:

Due to the scale and location of this development, I have recommended a condition requesting a Construction Management Plan.

Conditions Required: Without prejudice to any decision you shall make should you be mindful to grant permission against the recommendations of Public Protection I ask that the following conditions are inserted on any permission granted.

Prior to the commencement of development a scheme shall be submitted for the protection of the dwellings from noise from road traffic for approval in writing by the Local Planning Authority. The scheme shall follow the recommendations identified in the Cass Allen noise impact assessment report (Ref RP01-15382Rev1) dated 14th June 2016. No dwellings shall be occupied until the scheme providing protection for those dwellings has been implemented in accordance with the approved details and has been demonstrated to achieve the required noise levels to the satisfaction of the Local Planning Authority. The approved scheme shall be retained in accordance with those details thereafter.

Noise resulting from the use of plant machinery or equipment in relation to the use hereby approved shall not exceed a level of 5dBA below the existing background level plus any penalty for tonal, impulsive or distinctive qualities when measured or calculated according to BS4142:2014. The levels shall not exceed those stated in table 4 of the Cass Allen noise impact assessment report (Ref RP01-15382Rev1) dated 14th June 2016.

Prior to the commencement of development a scheme shall be submitted for the protection of the residential dwellings from internal and external noise (including deliveries) from adjacent commercial premises for approval in writing by the Local Planning Authority. The scheme shall follow the recommendations identified in the Cass Allen noise impact assessment report (Ref RP01-15382Rev1) dated 14th June 2016. No dwellings shall be occupied until the scheme providing protection for those dwellings has been implemented in accordance with the approved details. The

approved scheme shall be retained in accordance with those details thereafter.

Reason: To protect the residential amenity of any future occupiers.

Note: Notwithstanding the detail of the layout/uses etc has not been decided at this stage, as stated in the acoustic report, the scheme to be agreed will potentially include restrictions on hours of use and deliveries etc to ensure that residential amenity is not compromised.

No development approved by this permission shall take place until a Phase 2 investigation report, as recommended by the previously submitted FWS Consultants Ltd report dated January 2016 (Ref: 19720R01), has been submitted to and approved in writing by the Local Planning Authority. Where found to be necessary by the phase 2 report a remediation strategy to deal with the risks associated with contamination of the site shall also be submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall include an options appraisal giving full details of the remediation measures required and how they are to be undertaken. The strategy shall include a plan providing details of how the remediation works shall be judged to be complete and arrangements for contingency action.

Reason: To protect human health and the environment.

Prior to the commencement of the development, a detailed construction management plan shall be submitted to and approved in writing by the Local Planning Authority, and the plan shall include the following:

The construction programme and phasing

- a) Hours of operation, delivery and storage of materials*
- b) Details of any highway works necessary to enable construction to take place*
- c) Parking and loading arrangements*
- d) Details of hoarding*
- e) Control of dust and dirt on the public highway*
- f) Details of consultation and complaint management with local businesses and neighbours*
- g) Waste management proposals*
- h) Mechanisms to deal with environmental impacts such as noise, air quality, light and odour.*

Reason: In the interests of highway safety and the control of environmental impacts

Needs of Older
People (MANOP)
Team

The proposed development falls within the Chiltern Vale locality and the Houghton Hall ward. Chiltern Vale has a total population of 77,900 and 6,070 of these residents are aged over 75 years. This is forecast to rise to 9,934 by 2030. Delivering accommodation suitable for older people is therefore a priority for Central Bedfordshire Council.

In 2013 the Houghton Hall ward had 8,300 residents and 13% of its population was over 65 years old¹. For the same area 9.7% of households consist of one person of 65 years of age and over and a further 5.3% of households have more than one occupant, all of who are aged 65 and over². In 2011 9.6% of the population in this ward were retired, which is lower than the average for Central Bedfordshire (13.5%) and England (13.7%)³.

The number of older residents in this ward and the predicted rise in the people over 65 in the Chiltern Vale area demonstrates that there is likely to be demand for mainstream housing that is specifically designed for older people and for specialist accommodation for older people, such as residential care homes and housing with care and support available such as extra care developments.

If older people live in accommodation that does not meet their needs it can have an adverse impact on their health and well-being. In 2011 in the ward of Houghton Hall 8.2% of residents stated that their day to day activities were limited a lot due to a long term health condition or disability and a further 8.1% of residents said they were limited a little⁴. This highlights the need to have more accommodation available for older people that enables them to live independently within the community.

Central Bedfordshire Council uses the 'More Choice, Greater Voice' model to estimate demand for extra care dwellings based on the number of people over 75 in the population of the area. This model indicates a current demand for extra care dwellings in Chiltern Vale of 160, rising to 173 by 2020 and 217 by 2025. In the same area the supply of places is currently 116. There are currently no other extra care schemes in the locality under construction or with planning consent and the proposed scheme would meet forecast demand to 2030.

Design and layout

Good design can not only provide a better quality of life for

occupants but can reduce running costs. For extra care schemes the following features are considered important:

- Self-contained homes that are built with older people in mind, which can be easily adapted to accommodate increasing frailty.
- Hardwired and Wi-Fi enabled Telecare and Telehealth equipment.
- A restaurant to give residents the option to eat a hot meal with friends and visitors.
- Modern building standards and energy efficient design to help to keep energy costs as low as possible.
- Maximise levels of natural light throughout the scheme and include windows with low window sills to allow people who are seated or in bed to easily see out of the windows.
- Equipment, signage, internal décor and landscaping that enable people who have physical, sensory or cognitive impairments to be as independent as possible.
- Fully accessible, landscaped outside space that is stimulating contains seating and opportunities to be active.
- Communal facilities that are sufficient for the size of the scheme (ideally no less than 25% communal space), providing facilities and activities that are complimentary to those available in the local community and that facilitate a healthy and active lifestyle.
- Located close to local amenities in order to enhance the opportunities for residents to take part in the life of the local community. Residents should have easy access to shops, doctors, pharmacists and leisure activities.

The submitted plans indicate that the scheme is capable of meeting all of the above criteria.

Summary

Our view is that there is unmet demand for extra care dwellings in this area, that the design is appropriate and location is very suitable for this type of use. We therefore support the application.

1 Office for National Statistics, Mid-2013 Population Estimates for 2013 Wards in England and Wales, by Single Year of Age

and Sex

2 Office for National Statistics, 2011 Census, Household composition, Table KS105EW and Office for National Statistics, 2001 Census, Household composition by tenure and occupancy rating, Table CAS053

3 Office for National Statistics, 2011 Census, Economic Activity, Table KS601EW

4 Source: Office for National Statistics, 2011 Census, Long term health problem or disability, Table QS303EW

Sustainable Growth

The proposed development is located within south Central Bedfordshire area and development management policies are set by the saved policies from the South Bedfordshire Local Plan. Policy BE8: Design and Environmental Standards states that proposals should maximise energy efficiency and conservation through orientation, layout and design of buildings, use of natural lighting and solar gain, and take full advantage of opportunities to use renewable or alternative energy sources. It also requires proposals to demonstrate how trees and vegetation have been used to achieve visual, acoustic, energy saving, wildlife and other environmental benefits.

The policy does not stipulate amount of energy to be delivered from the renewable sources. The Council has undertaken review of renewable and low carbon technologies to establish a reasonable expectation for renewable energy generation.

The study concluded that 10% energy demand can be met from renewable or low carbon sources on site and is both technically feasible and economically viable to achieve. The study used the 2013 Part L to determine energy demand baseline.

The policy also requires efficient use of scarce resources. Central Bedfordshire is located within water stressed area as identified in the Council's Climate Change Risk Assessment study. All developments in Central Bedfordshire are required to achieve a higher water efficiency standard of 110 litres per person per day to mitigate against potential water shortages. This standard can be easily achieved through installation of water efficient fittings.

The above requirements on energy efficiency, renewable energy contribution, water efficiency and adaptation to climate change are supported by the NPPF policies in section 10: Meeting the Challenge of climate change, flooding and coastal change

The applicant proposes that the development is to achieve high energy efficiency and minimise energy demand through application of fabric first approach and efficient services. It is proposed that the development is to achieve AECB Silver or even Passivhaus standard. This will result in much lower energy demand and carbon emissions than required by the Building Regulations. Both standards expect the development to have energy demand not exceeding 15kWh/m² per annum. As the energy demand is likely to be more than 10% lower than maximum required by the Building Regulations the scheme will not be required to source its 10% of energy from renewable or low carbon sources. However I would recommend installation of PV panels that can even further reduce cost and carbon emissions of using grid electricity, particularly that the scheme will have a number of communal areas. Installation of PV panels on roofs is supported by the Government's Solar Strategy.

The applicant states that scheme's design will address issues of solar gains and overheating and will achieve good summer comfort as well as good indoor air quality. This is welcomed.

The applicant proposes to include water saving measures such as aerated taps, dual flush toilets and water butts. This approach is welcomed as the scheme will be expected to achieve 110 litres per person per day for each individual residential unit.

To ensure that the proposed approach is implemented I request the following planning conditions to be attached:

- *All residential units must achieve the higher water efficiency standard of 110 litres per person per day;*
- *Overall the scheme must achieve minimum 10% energy demand reduction from baseline of Part L of the Building Regulations (either through fabric improvement and /or renewable and low carbon technologies).*

Water efficiency condition will be dealt with through the building control process.

Energy condition must be discharged prior to construction through submission of documents demonstrating at least 10% reduction in energy demand.

Ecology

I have read through the Ecological Appraisal and I am satisfied that the proposals will not impact on a protected species. However, in 6.5, the appraisal states, *'The layout offers opportunities to provide enhancements for local habitats and fauna. These may be achieved through the planting of new native tree and shrub species, and providing features for*

fauna, such as bat and bird boxes or bug hotels, within the layout. These enhancements would help achieve net benefits for a range of species, including those known to occur in the local area.'

Whilst I acknowledge and welcome the proposed roof garden I would like to ensure that opportunities to secure a net gain for biodiversity in line with the NPPF are secured. Plant species are not fully listed but these should include nectar rich species to benefit pollinators. I would also ask that integrated bird and bat boxes are incorporated into the built fabric of the new development, I would expect at least 10 of each to be provided. Bat surveys identified a bat interest in the surrounding area so providing roosting opportunities would be a gain for bats. Equally the presence of birds, including the potential for feeding stations would provide valuable interest for residents whilst enhancing the area for wildlife.

Landscape

Many thanks for the opportunity to comment on the proposals regarding landscape; whilst I have no objection over all to the proposed re-development and landscape proposals in general it is disappointing that there hasn't been more dialogue via the site / development promoter regarding the built form and landscaping - especially given the extensive public consultation that apparently has been undertaken.

Considering the submitted landscape proposals: the proposed inclusion of primarily native planting to some external hedgerows is a real positive.

The arrangement of space/ ground floor level landscaping to the north-eastern side of the development including car parking facing on to The Green is not acceptable; this elevation is potentially the most sensitive as it is orientated on to a key public and historic open space within Houghton Regis, forms part of the setting to the Conservation Area and formal approach to Houghton Hall Park House entrance. I recommend this frontage remain primarily soft landscaped in character with The Green with footpath access only, simple shared surface if emergency access is required, but the inclusion of parking is not acceptable.

An open outlook from the proposed southerly facing elevation on to garages at Clarkes Way is not acceptable and I recommend additional street trees be introduced to veil views and aid shade to rooms given the southerly sunny aspect.

The actual areas of green roofs needs to be confirmed in landscape drawings; the D&AS suggests there will be substantial areas of 'green' sedum roofs, and which I thoroughly endorse, but the actual areas / locations aren't detailed in submitted landscape plans along with

specifications for substrate, planting specs' and maintenance / access requirements - this needs to be clear and confirmed on plan.

Given green roofs form a valuable initial feature as part of a SuDS management train, in slowing and attenuating surface water run off as part of a site wide SuDS system, it is very disappointing that the general principle of dealing with surface water appears to be a piped solution and attenuation in mainly employing sub surface containers. Surface water drainage systems needs to be in accordance with the CBC SuDS SPD Guidance, employing a series of SuDS filter and attenuation features and linked to infiltration if possible.

The opportunity to include SuDS within landscape areas including bio retention areas / 'rain water gardens' and including surface water drainage as features within the development and landscape needs to be considered further as part of a re-submission of landscape proposals. The following images are examples of landscape SuDS features including; filter strips within hard surfaces, small attenuation basins linked to out falls, bio retention areas, rain water chains to slow run off from roofs as features in building design, and bio retention 'rain water gardens'.

The proposed landscape design includes very defined internal gardens and garden character areas which adds interest visually but I query if there is 'over design' of communal garden spaces and the opportunity for future residents to participate in gardening individually on site to 'grow your own' or as part of a small group of intensive growers including raised vegetable beds or even green walls which can include planting structures supporting salad and fruit crops to celebrate interaction with flowers, vegetable and fruit cultivation on site - as urban intensive and interactive horticultural asset land directly linked to health and wellbeing of future residents.

Green Infrastructure The site interfaces with the village green, and for green infrastructure, this is an important interface.

Although the buildings are oriented positively towards this, the parking between the buildings and the village green could have a negative impact. The opportunity to relocate this parking, or improve the design of the area through screening where appropriate should be considered. There are also some trees being removed in this area, these should be replaced with appropriate species.

The proposals for SuDS show some very positive features, particularly the use of roof gardens / green roofs. Further details of the design and planting would be required - this

could be included in the drainage condition suggested by flood risk colleagues. The design should enhance biodiversity.

However, the use of crated attenuation is not acceptable, in line with CBC's adopted sustainable drainage SPD. As suggested by flood risk colleagues, this could be addressed through condition, but the applicant should consider the SPD, and submit further designs to comply with the local requirements set out in the SPD.

Public Art

Central Bedfordshire Council actively encourages the inclusion of Public Art in new developments and looks to developers / promoters of sites to take responsibility for funding and managing the implementation of Public Art either directly or through specialist advisers and in consultation with Town and Parish Councils and Central Bedfordshire Council.

Public Art enhances sense of place and quality in the environments, Public Art projects can also be a valuable tool in community engagement; bringing together existing and new communities to engender sense of ownership and reinforce community cohesion.

The proposed development is of a scale and character to offer numerous opportunities for a series of artistic interventions to create an exemplar scheme in terms of bespoke design and detail and engender a sense of place for new and existing communities. The submitted Design & Access Statement suggests a key sculptural piece at the main entrance but I recommend there are many more aspects where public artists and craftspeople can be involved in the detail design of, for example; entrances, doorways, glazing and furniture, ironwork in railings and balconies, mosaics in walls and floors capes, furniture, carpets and fabrics.

Therefore I recommend a Public Art Plan be developed by the applicant, and submitted for approval by the LPA, identifying a series of opportunities for Public Art to be included in the design of the proposed development in terms of structures, furnishings as well as standalone features and budgets identified to support this aspect of the development, which could include budgets for standard items such as for railings being given over to public artists / craftspeople to reinterpret in a unique way specific to the development, community and surrounds.

Key requirements of the Public Art Plan are:

- Public Art be integrated in the development design process and be addressed in Masterplans and Design Codes.
- Where possible artists should be appointed as part of the design team.

- Public Art should be site specific; responding to place and people including environment and materials.
- Public Art should be unique, of high quality and relevant to local communities.

Public Artists can include:

- Artists and artisans, artist architects, landscape artists - with experience in working in collaboration with developers, design teams and local communities.

If the application were to be approved I request a Condition be applied with suggested wording but await your advice on this:

No part of development shall be brought in to use until a Public Art Plan is submitted to and approved in writing by the Local Planning Authority. Installation of Public Art shall commence on site prior to occupation of 50% of dwellings. The Public Art Plan shall be implemented in full and as approved unless otherwise amended in accordance with a review to be agreed in writing by the Local Planning Authority.

The Public Art Plan should detail:

- Management - who will administer, time and contact details, time scales / programme
- Brief for involvement of artists, site context, background to development, suitable themes and opportunities for Public Art
- Method of commissioning artists / artisans, means of contact, selection process / selection panel and draft contract for appointment of artists
- Community engagement - programme and events
- Funding - budgets and administration.
- Future care and maintenance.

The Central Bedfordshire Design Guide, Section 4 Public Realm is available on the CBC website and offers comprehensive advice on the integration of Public Art within development. I would also be very happy to liaise with the applicant / developer to provide advice and support if required.

Bedfordshire and
River Ivel Drainage
Board

No comments

Anglian Water

ASSETS

Section 1 - Assets Affected

1.1 Our records show that there are no assets owned by Anglian Water or those subject to an adoption agreement within the development site boundary.

WASTEWATER SERVICES

Section 2 - Wastewater Treatment

2.1 The foul drainage from this development is in the catchment of Dunstable Water Recycling Centre that will have available capacity for these flows.

Section 3 - Foul Sewerage Network

3.1 The sewerage system at present has available capacity for these flows. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection.

Section 4 - Surface Water Disposal

4.1 The surface water strategy/flood risk assessment submitted with the planning application relevant to Anglian Water is unacceptable. We would therefore recommend that the applicant needs to consult with Anglian Water and the Lead Local Flood Authority (LLFA).

We request a condition requiring a drainage strategy covering the issue(s) to be agreed.

Section 5 - Trade Effluent

5.1 The planning application includes employment/commercial use. To discharge trade effluent from trade premises to a public sewer vested in Anglian Water requires our consent. It is an offence under section 118 of the Water Industry Act 1991 to discharge trade effluent to sewer without consent. Anglian Water would ask that the following text be included within your Notice should permission be granted.

“An application to discharge trade effluent must be made to Anglian Water and must have been obtained before any discharge of trade effluent can be made to the public sewer. Anglian Water recommends that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of such facilities could result in pollution of the local watercourse and may constitute an offence. Anglian Water also recommends the installation of a properly maintained fat traps on all catering establishments. Failure to do so may result in this and other properties suffering blocked drains, sewage flooding and consequential environmental and amenity impact and may also constitute an offence under section 111 of the Water Industry Act 1991.”

Section 6 - Suggested Planning Conditions

Anglian Water would therefore recommend the following planning condition if the Local Planning Authority is mindful to grant planning approval.

Surface Water Disposal (Section 4)

Condition

No drainage works shall commence until a surface water management strategy has been submitted to and approved in writing by the Local Planning Authority. No hard-standing areas to be constructed until the works have been carried out in accordance with the surface water strategy so approved unless otherwise agreed in writing by the Local Planning Authority.

Reason

To prevent environmental and amenity problems arising from flooding.

Archaeology

The proposed development site is located within the core of the historic settlement of Houghton Regis (HER 16988), a heritage asset with archaeological interest as defined by the *National Planning Policy Statement (NPPF)*.

The settlement of Houghton Regis is of Saxon origin. At the time of the Domesday Survey of 1086 AD it was a Royal manor, with a church and an estate of just over 2000 hectares that included Dunstable, Puddlehill, Thorn, Calcutt and Sewell. Documentary evidence suggests that at the time of the Norman Conquest, Houghton manor was wealthy and prosperous. In the early 12th century, Houghton's significance was eclipsed by Dunstable, when Henry I invested in the creation of a new, planned market town, a Royal residence and the foundation of the Augustinian Priory of St Peter. Around this time the manor of Houghton was given to Hugh de Gurney, and the Church (which is assumed was at the same location as the present All Saints) was given to the Earl of Gloucester, eventually passing to St Albans Abbey and remaining with it until the Dissolution in the 16th century. The medieval parish church of All Saints (HER 5385) a Grade I Listed Building lies to the north west. The present church is 14th century in origin but was extensively restored in the 19th century. It is likely to be on the site of an earlier church. The fortunes of the manor of Houghton remained intrinsically

linked with Dunstable and the Priory of St Peter, which had been granted substantial amounts of land in Houghton, and inevitably this led to tensions between the two manors. The medieval settlement of Houghton Regis developed in a fairly typical nucleated fashion, with the focus centred upon All Saints Church and the Green (HER 12240). The location of the original manorial complex is, however, not known. It has been suggested that it lay to the immediate north of the Green in a large enclosed area (as shown on the Enclosure Map of 1776) but there is nothing further to substantiate this assertion. From the mid 16th to mid 17th century it passed through a succession of owners. Around 1653 however it was bought by Henry Brandreth and it was Brandreth's daughter Alice who was responsible for building Houghton Hall, to the south of the Green and what was to become Houghton Hall Park. Houghton Hall (HER 5687 and Grade II* Listed Building) and its associated Park (7024) are located to the south east of the proposed development site. Construction of the Hall was complete by 1700. In 1750 the estate was sold to the Duke of Bedford although the Brandreth family reacquired the estate in the late 18th century and increased the extent of the Park. The Red House (HER 5688 and Grade II Listed Building), a 17th century timber framed building is on the eastern edge of the site. There is evidence for a number of former buildings on the site, all now demolished including a blacksmiths shop (HER 12235), 141-147 High Street, a series of late 18th century houses (HER 5699) and a 19th century Church of England School (HER 6618).

Historical evidence for Saxon and medieval Houghton is supported by an emerging archaeological record from within the settlement and the surrounding area. The earliest evidence for the original settlement was discovered between the late 1930's and 1960's (prior to the re-development of the area), when a number of features; including ditches, pits, a burial and well were recorded to the north east of the proposed development site at Easthill and Chantry Farms and surrounding area (HERs 142 and 1919). Artefact remains included Stamford Ware and St Neots Ware pottery dating from the 10th to 12th centuries.

The application is accompanied by two documents relating to the archaeological resources of the site: an *Archaeological Evaluation and Heritage Statement* (Albion Archaeology 12th May 2016) and a *Heritage Statement* (Albion Archaeology 8th

August 2016). The archaeological evaluation comprised of the excavation of six trial trenches evenly distributed across the site. A number of archaeological features were identified, but only one was of any antiquity: a pit dated by pottery finds to the 12th-13th century AD. The other features, where they were dated, all appeared to be 19th century or later. The evaluation also showed that previous development had been subject to extensive levelling and construction activity which will have compromised the survival of archaeological remains within the proposed development site. The *Archaeological Evaluation and Heritage Statement* concludes that low to moderate potential to contain archaeological remains dating to the medieval period and negligible to low potential for earlier periods. This is a reasonable conclusion based on the available evidence.

Groundworks associated construction of the development are identified in the *Archaeological Evaluation and Heritage Statement* as having the potential to cause moderate to substantial harm to sub-surface archaeological features. It is suggested that it would be possible to mitigate this impact on archaeological remains through a programme of archaeological investigation and recording.

It has been shown that the proposed development was occupied during the medieval period, though the evaluation did not produce clear evidence about the nature of that occupation. This may be partly because the occupation was not particularly substantial and did not leave extensive remains. The lack of extensive archaeological remains is also a function of later use and development of the site, particularly in the 20th century which has resulted in levels of ground reduction and disturbance which has severely reduced the likelihood that substantive archaeological remains from the medieval period will survive within the site. The proposed development will result in the destruction of any archaeological remains within the site which will result in a loss of significance to the heritage asset with archaeological interest; however, because the survival of archaeological remains likely to be limited the loss of significance will consequently be small. The loss of significance to the heritage asset will be similarly small and not enough to justify any further archaeological investigation in advance of development. Therefore, I have no objection to this application on archaeological grounds.

Environment Agency No objection

Housing Development I support this application for 168 independent living units with the development providing far in excess of a policy compliant scheme from an affordable housing perspective. The development is looking to maximise the delivery of both affordable rented and shared ownership units from the scheme with a limited number of market units incorporated which is welcomed by the Council. The scheme will deliver a range of 1 & 2 bed apartments for both rent and shared ownership.

From a Strategic Housing perspective I am fully supportive of the proposed development.

Leisure and Open Space No comments

Private Sector Housing No comments

Waste Services - It is unclear which bin stores are assigned to residential and which to retail (e.g. Bins 03) Please clarify how much capacity of each waste type has been allocated. Communal waste provision is allocated on the basis of 90l per week per waste stream per property and we anticipate that all properties will share bins. Please note that bins are chargeable for all properties and developers will be required to pay for all required bins prior to discharging the relevant condition. 1100l bins will be charged at £350 + VAT per bin.

- Space for a vehicle of a minimum 12metres in length and 2.5 metres in width should be provided. Wherever possible, refuse collection vehicles will only use adopted highways. If the access road is to be used, it must be to adoptable standards. Typically, until roads are adopted, bins are to be brought to the highway boundary or a prearranged point. Our collection staff will collect bins from a bin store, but will only move them a maximum of 10m, therefore the location of the bin store should be reconsidered. If residents are required to pull their bins to the entrance to the highway, a hard standing area needs to be provided for at least 1 wheelie bin per property and a food waste caddy, in addition to reusable garden waste bags. Please advise from where you anticipate our RCVs will collect the waste.

- Dropped kerbs are required to empty communal bins.

Highways England No objection

Strategic Transport - Travel Plans The framework travel plan which is included in the Transport Assessment is quite light in content, but proposed measures

such as the electric car club are welcomed and are proving successful at similar sites. If, as per section 5.1 of the TA, this application is outline rather than full then it is the framework travel plan submitted is acceptable at this stage provided there is a condition as below to produce and seek approval for a full plan pre occupation.

The development shall not be occupied until a Full Travel Plan has been submitted to and approved in writing by the Council, such a Travel Plan to include details of:

- Predicted travel to and from the site and targets to reduce car use.
- Details of existing and proposed transport links, to include links to both pedestrian, cycle and public transport networks.
- Measures to minimise private car use and facilitate walking, cycling and use of public transport.
- Timetable for implementation of measures designed to promote travel choice.
- Plans for monitoring and review, annually for a period of 5 years at which time the obligation will be reviewed by the Council.
- Details of provision of cycle parking in accordance with Council guidelines.
- Details of marketing and publicity for sustainable modes of transport to include site specific travel information packs, to include:
 - Site specific travel and transport information
 - Travel vouchers
 - Details of relevant pedestrian, cycle and public transport routes to/ from and within the site
 - Copies of relevant bus and rail timetables
- Details of the appointment of a travel plan co-ordinator.
- An Action Plan listing the measures to be implemented and timescales for this.

No part of the development shall be occupied prior to implementation of those parts identified in the Travel Plan. Those parts of the approved Travel Plan that are identified as being capable of implementation after occupation shall be implemented in accordance with the timetable contained therein and shall continue to be implemented as long as any part of the development is occupied.

Bedfordshire Clinical Commissioning Group (BCCG) Unfortunately we are not yet in a position to calculate the cost pressure to services other than GP Core services - the below is the response for GP Core Services:

If this development materialises, it would affect Houghton Regis Medical Centre, which is already operating at capacity and their ability to accept new patients is very limited.

According to our records they currently occupy a floor area of 378m² NIA (net internal area). Their patient list as of 1 April 2016 was 10,805 and this results in practice having 28.57 patients per m², which is considered extremely high in comparison to the region's average (across Hertfordshire, Northamptonshire, Bedfordshire, Milton Keynes) of 22.

According to the Department of Health's Principles of Best Practice, a surgery with 10,000 registered patients is recommended to have 730-750m² NIA (net internal area) of floor space, which is more than double of what they currently have. It should also be noted that the Principles of Best Practice is only concerned with the GP core services and does not provide size guidance for extended services, which most surgeries are offering.

In light of the above, in order to make this application acceptable to NHS England, we would like to request that a charge is made per dwelling as calculated below:

168 dwellings x 2.4= 403 new patients

403/ 2,000 = 0.2016 GP (based on ratio of 2,000 patients per 1 GP and 199m² as set out in the NHS England "Premises Principles of Best Practice Part 1 Procurement & Development")

0.2016 x 199m² = 40.1184m² additional space required

40.1184 x £2,964 (build costs including fit out and all fees based on our previous projects) = £212,340.96

£118,910.9376/ 168 = £707.80 rounded up to £708 per dwelling

Our calculations above are based on the impact of this development only, on the number of dwellings proposed and do not take into account any existing deficiencies.

*There is a formula that measures GP Core services as a *third* of all the cost pressure to Health services, which would mean that any other services are twice as much as quoted above i.e. £1,416 which added together would be £2,124. However, our BCCG financial officer does not agree with this formula and we are yet to agree a new way of working it out so until we are able to do this (which we do hope is very soon) the above is the best we can provide.*

Countryside Access	No comments
Historic England	No representation received

Other Representations:

Neighbours

Representations objecting to the proposal were received from Nos. 5, 8, 9, 11, 12, 15 and 24 Whitehouse Close:

Proposal visually overbearing, dominant and overpowering due to height and colour.

Inappropriate design for this part of town.

Large building out of keeping with neighbouring properties.

Pedestrian and vehicular access points into Whitehouse Close would encourage parking in the road and additional footfall, and additional traffic, causing noise, pollution and inconvenience. Access should only be in the event of an emergency.

Overspill or convenience parking in Whitehouse Close.

Negative environmental impact.

Due consideration not given to what is in keeping with existing aspects of High Street and village green.

Building materials not appropriate.

Proposal could set unwanted precedent for future regeneration, e.g. Bedford Square.

Car parking inadequate.

In light of extra motor traffic and pedestrians on an already dangerous traffic system, Highways must view with urgency what can be done to increase safety.

Determining Issues:

The main considerations of the application are:

1. Principle of Development
2. Character and Appearance, and Impact on Conservation Area and Listed Buildings
3. Tree Impact
4. Impact on Amenity of Neighbouring and Future Occupants
5. Highway Considerations
6. Archaeological Impact
7. Ecological Impact
8. Contamination
9. Affordable Housing and Section 106 Requirements
10. Other Considerations

Considerations:

1. Principle of Development

- 1.1 Paragraph 47 of the National Planning Policy Framework (NPPF) seeks to boost significantly the supply of housing and policy 49 states that housing applications should be considered in the context of the presumption in favour of sustainable development. Then paragraph 50 seeks a wide choice of high quality homes.
- 1.2 The proposal would deliver 168 units, which would provide a significant housing contribution, when there is an identified need for additional housing in the district of Central Bedfordshire. The latest five year housing supply position (July 2016) is a supply of 4.82 years (which equates to a shortage of 353 units).
- 1.3 The proposal would provide 168 independent living, or extra care, apartments, intended for people who are aged 55 or over who may or may not require care. They would comprise 84 affordable rent apartments, 57 shared ownership apartments, and 27 apartments for outright sale.
- 1.4 The proposed development falls within the Chiltern Vale locality and the Houghton Hall ward. Chiltern Vale has a total population of 77,900 and 6,070 of these residents are aged over 75 years. This is forecast to rise to 9,934 by 2030. As stated in the consultation response from the Meeting the Accommodation Needs of Older People (MANOP) team, delivering accommodation suitable for older people is therefore a priority for Central Bedfordshire Council.
- 1.5 In 2013 the Houghton Hall ward had 8,300 residents and 13% of its population was over 65 years old. For the same area 9.7% of households consist of one person of 65 years of age and over and a further 5.3% of households have more than one occupant, all of who are aged 65 and over. In 2011 9.6% of the population in this ward were retired, which is lower than the average for Central Bedfordshire (13.5%) and England (13.7%).
- 1.6 The number of older residents in this ward and the predicted rise in people over 65 in the Chiltern Vale area demonstrates that there is likely to be demand for mainstream housing that is specifically designed for older people and for specialist accommodation for older people, such as residential care homes and housing with care and support available such as extra care developments.
- 1.7 If older people live in accommodation that does not meet their needs it can have an adverse impact on their health and well-being. In 2011 in the ward of Houghton Hall 8.2% of residents stated that their day to day activities were limited a lot due to a long term health condition or disability and a further 8.1% of residents said they were limited a little. This highlights the need to have more accommodation available for older people that enables them to live independently within the community.
- 1.8 Central Bedfordshire Council uses the 'More Choice, Greater Voice' model to estimate demand for extra care dwellings based on the number of people

over 75 in the population of the area. This model indicates a current demand for extra care dwellings in Chiltern Vale of 160, rising to 173 by 2020 and 217 by 2025. In the same area the supply of places is currently 116. There are currently no other extra care schemes in the locality under construction or with planning permission and the proposed scheme would meet forecast demand to 2030.

1.9 Specifically in relation to the town centre location, NPPF paragraph 23 refers to the important role residential development can play in ensuring the viability of centres. South Bedfordshire Local Plan Review (SBLPR) policy TCS1 states that favourable consideration will be given to proposals which will sustain and enhance the vitality and viability of the town centre and in particular those which support the retail function and contribute to town centre regeneration. The policy states that the redevelopment of vacant sites for retail and/or other uses which support the vitality and viability of the town centre will be given favourable consideration.

1.10 Also of note is the Houghton Regis Town Centre Masterplan Supplementary Planning Document (SPD), 2008 which refers to the application site having retail use at ground floor with residential above. It also refers to the provision of a pedestrian link between Clarkes Way and the High Street.

1.11 In light of the above policy context, the general need for additional housing in Central Bedfordshire, the specific need for independent living accommodation, the range of tenure types, and the provision of six ground floor retail units, the principle of residential and retail development on a large and partly vacant town centre site is acceptable.

2. Character and Appearance, and Impact on Conservation Area and Listed Buildings

2.1 The application site is in Houghton Regis town centre, and the eastern section is in the Houghton Regis Conservation Area. The site also contains The Red House, a Grade II Listed Building. To the north west is All Saints Church which is Grade I listed. The proposed development needs to relate to its surrounding environment, including the Heritage Assets and other nearby buildings.

2.2 The proposed development would be designed as a single building shaped as a figure of eight to create a range of public spaces, and would range from single storey to five storey. External landscaped areas would be provided.

2.3 The proposed five storey element would front the High Street; this would consist of four standard storeys with the fifth floor of accommodation recessed back from the main building line. This part of the development would be immediately to the east of the three storey Rosalyn House and opposite the two storey Bedford Square. Clearly, and particularly in the context of the surrounding area where buildings (with the exception of the Church tower) have a maximum height of three storeys, it would be a structure of considerable height (16.45m), length (72.0m) and therefore overall size. However, the fifth floor setback would partly mitigate this, as would the large setback from the High Street (up to 12.75m) in order to

provide a wide strip of public space. This setback would ensure that views of All Saints Church are not impaired when entering the centre of Houghton Regis from the east.

- 2.4 Furthermore, it is noted that during pre-application negotiation, comments from Historic England resulted in the proposed copper roof with a series of pitches changing to a simpler flat overhanging copper roof, with a reduction in height of between 1.5m and 2.0m. This would give the building a less heavy appearance and make it less prominent in views from Bedford Road with All Saints Church in the foreground.
- 2.5 Also, in considering the acceptability of the height and scale of the High Street, it needs to be borne in mind that this part of the proposal is deliberately designed to be prominent and to have a strong frontage to create a sense of arrival when approaching the centre of Houghton Regis.
- 2.6 In view of the above, it is considered that the proposed five storey element would lead to less than substantial harm to the setting and significance of a designated heritage asset, i.e. Houghton Regis Conservation Area (this part of the proposal is outside the Conservation Area). Paragraph 134 of the NPPF advises that this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. The public benefits of the scheme, including securing a viable use for the site, outlined in the 'Principle of Development' section above, are considered to clearly outweigh the less than substantial harm.
- 2.7 Moving around from the High Street and into Whitehouse Close, the building would step down from five, to three and then two storey where it meets the first bungalow (No. 1) on this side of the road. This gradual dropping of height would give the proposed Whitehouse Close street scene an acceptable appearance.
- 2.8 From the western edge of the proposed elevation fronting Clarkes Way where the building extends northwards, it is two storey in height to reflect the scale of the properties directly opposite. The Clarkes Way elevation has been designed as three storeys which reflects, in part, the elevation of the existing Red House Court building in this location. Where the eastern part of the Red House Court frontage is two storey, the proposed building would be setback to make it less dominant in the street scene.
- 2.9 The Clarkes Way and The Green corner of the development would be marked by a two storey projecting bay feature with a balcony above serving the third floor. This would be at a 45 degree angle to both elevations and ensure that this corner is a focal point. The elevation fronting The Green would also be predominantly three storey; however, the element adjacent to The Red House would be reduced to two storeys with dormer windows. This would ensure that the proposed elevation fronting The Green has an acceptable relationship with The Red House. The impact of the proposal on The Red House is considered further below.
- 2.10 From the rear of the Red House, the proposed building would wrap around the proposed entrance piazza and step up in height from three to four to

five storeys until it meets the High Street frontage.

- 2.11 Beyond the five storey frontage building with a flat overhanging copper roof, the lesser height elements would display a range of pitched and flat roof elements. A series of projecting parapets, gables, bays, chimneys and balconies would be incorporated into the design. The range of features and varying roof lines would create interest but ensure a traditionally domestic form.
- 2.12 The proposed material palette would consist of a mixture of stone, light and dark facing brick, copper cladding and render. The use of stone cladding on the upper floors of the High Street elevation respond to the material palette of All Saints Church. The use of large areas of glazing and dark brick panels at ground floor level, with a mixture of light stone cladding and light facing brick above, and the roof of the recessed upper floor clad in copper, would give the High Street elevation a sleek, modern appearance.
- 2.13 Beyond the five storey High Street building, the materials palette is generally less varied to reflect the more residential aesthetic. Here brick and pitched roof tiles are predominant, but with render and natural stone used to pick out key features on the facades. The roof tiles on the nearest segment of the new building to the Red House would be chosen to compliment the existing roof tiles of The Red House.
- 2.14 A single storey glazed link is proposed to connect the Red House into the rest of the development. Glazed sections to both sides and the rear would expand the useable floor space within the building. The glazed elements would be single storey and setback from the front of the Red House, in order to limit their impact on its setting. Pre and during application negotiation has resulted in a number of improvements to the treatment of the Red House and its setting. These include the provision of a courtyard garden to the front enclosed by a brick wall and wall-top railings.
- 2.15 Other changes include the recessing of the brick infills to the existing openings to allow the original window positions to be identified. Also access from the café into the Red House has been adjusted to line with the existing window jambs. The reduced opening size has resulting in a smaller sliding door, which has been adjusted to a glazed sliding screen. The existing flint wall is now visible when the screen is left in the open position.
- 2.16 The proposed layout contains several landscaped areas, both at ground level and in roof gardens. As well as such spaces providing amenity for residents and visitors, in some instances, for example the enclosed garden to the rear of the site, they also provide a green buffer between the proposed building and the existing properties in Whitehouse Close and Clarkes Way. The inclusion of primarily native planting to some external hedgerows and substantial areas of 'green' sedum roofs, and the provision of trees and landscaping on the High Street to facilitate a green corridor linking The Green and All Saints Church, are positive aspects of the landscape proposal.

- 2.17 However, the Landscape consultation response raises several concerns. Firstly, a concern is raised with the arrangement of space / ground floor level landscaping to the north-eastern side of the development including car parking facing on to The Green due to the impact on the setting of the Conservation Area and formal approach to Houghton Hall Park House entrance. Whilst acknowledging this concern, it is also recognised that this part of the site currently contains areas of hardstanding and car parking. Also, the attempt to provide a limited number of car parking spaces throughout the scheme whilst meeting demand needs to be considered (see 'Highway Considerations' section below). Furthermore, the proposal indicates that this space would be broken up by areas of landscaping and tree retention, and a substantial area of grass and trees exists outside the site between the access road (within the site) and Redhouse Court Road. In view of these factors, on balance, the provision of car parking on the north-eastern side of the development would not be harmful to the character of the Conservation Area and The Green.
- 2.18 Secondly a concern is raised in respect of an open outlook from the proposed southerly facing elevation on to garages at Clarkes Way and that additional street trees should be introduced to veil views and aid shade to rooms. Whilst acknowledging this concern, it is also recognised that the view would be the same as from the existing Red House Court development, and the use of trees to veil views of garages opposite needs to be weighed against achieving acceptable levels of daylight and sunlight to rooms. In view of these factors, on balance, the provision of additional street trees in Clarkes Way is not considered necessary.
- 2.19 The landscape consultation response also raises concerns with the principle of dealing with surface water. However, drainage is dealt with in the consultation response of the SuDS Management Team, and as referred to below, conditions should be imposed in respect of the detailed design for surface water drainage based on sustainable drainage principles.
- 2.20 To safeguard the character and appearance of the completed development, its surroundings, the Conservation Area and its setting, and the historic significance and traditional character of the Listed Buildings within and near to the site, any planning permission granted should be subject to conditions. These include the provision of an external material samples and an external finishes schedule, details of boundary enclosure structures, details of all new gates, timber and metal bollards and exterior lighting installations, and details of hard and soft landscaping.
- 2.21 Overall, the proposal would be compatible with the character and appearance of its surroundings and the Houghton Regis Conservation Area, and would relate to and not be detrimental to the historic significance and traditional character of the Listed Buildings within and near to the site. The proposal would comply with Section 7 (Requiring good design) and Section 12 (Conserving and enhancing the historic environment) of the National Planning Policy Framework and Policy BE8 (Design Considerations) of the South Bedfordshire Local Plan Review.

3. Tree Impact

- 3.1 The application is accompanied by an Arboricultural Impact Assessment (RSK, July 2016). This surveys 37 individual trees and five groups of trees within the site. The Trees and Landscape consultation response expresses concern at the removal of 23 of these individual trees and four of these groups of trees, both in order to facilitate development, and to allow space for demolition and construction. Concern is also expressed in respect of severe incursions into the Root Protection Areas and significant pruning of the canopies of trees to be retained on the periphery of the site. The response states that the loss of trees would have an adverse impact on the character of the Houghton Regis Conservation Area and on the visual amenity provided by the existing treescape.
- 3.2 Following the consultation response, negotiation has taken place with the agent for the applicant which has resulted in the retention of five individual trees previously intended for removal; therefore 18 individual trees would be lost.
- 3.3 The first is T34, located at the sensitive south east corner of the development adjacent to The Green. Also T31, on The Green frontage, and T36 on the Clarkes Way frontage would be retained. This would require the omission of two proposed car parking spaces; however, as the car parking provision is considered acceptable (see 'Highway Considerations' section below), this omission is acceptable. Finally, T20 and T21, on the High Street frontage, would be retained and incorporated into the proposed green corridor linking The Green and All Saints Church.
- 3.4 Whilst it is acknowledged that the proposal would still result in the loss of a large number of trees, significantly Group 5 on the prominent north east corner of the site adjacent to the High Street would be retained. Furthermore most of the trees fronting The Green would be kept, and these would be supplemented by the trees outside the site between the access road (within the site) and Redhouse Court Road. Also, the loss of trees needs to be balanced against the significant benefits of the scheme explained in the 'Principle of Development' section above, i.e. assisting in meeting the general need for additional housing in Central Bedfordshire, and the specific need for independent living accommodation.

4. Impact on Amenity of Neighbouring and Future Occupants

- 4.1 There is existing residential development surrounding the application site in Bedford Square, the High Street, Whitehouse Close and Clarkes Way. The flats above shop units in Bedford Square and the houses on the High Street are a minimum of 30m from the proposed development, on the opposite side of the High Street. Given this separation, the occupants of these properties would not suffer any loss of amenity from the proposal.
- 4.2 Likewise the houses at Nos. 1 to 4 Clarkes Way would be positioned at least 30m from the proposal, and the house at No. 5 Clarkes Way and the flats at No's 83 to 86 Clarkes Way would be separated by a minimum of 12m; none of these would be front to front relationships. These distances would again be sufficient to ensure there is no loss of amenity to occupants.

- 4.3 The proposal would face directly towards the two storey side windowless gable elevation of the flats at Nos. 93 and 94 Clarkes Way at a minimum distance of 9.5m. Whilst there would be first floor side windows facing towards the communal rear gardens of these properties and Nos. 89, 90, 91, 92 and 95 Clarkes Way, these would be at a minimum distance of 10m and intervening tree planting is proposed. On balance, it is not considered that harmful overlooking and a loss of privacy would result. It should also be noted that the existing Red House Court building is also two storey in this location, with a side elevation containing first floor windows closer to the boundary with Nos. 93 and 94.
- 4.4 The proposed two storey building adjacent to the boundary with Nos. 93 and 94 Clarkes Way would have a height to eaves level of 5.9m and a height to ridgeline of 8.2m. This would be lower than the existing building (equivalent eaves height of 5.05m and ridgeline height of 9.2m) and would not appear dominant or overbearing to the occupants of Nos. 93 and 94.
- 4.5 To the rear of the flats at Nos. 89 to 95 Clarkes Way and to the rear of the bungalows at Nos. 1 to 3 Whitehouse Close is a proposed landscaped area, free of any proposed buildings. No. 1 Whitehouse Close is a semi detached bungalow with an attached side garage adjacent to the boundary with the application site. The proposed development adjacent to this boundary would be two storey (it would step down from the junction of Whitehouse Close with the High Street from five, to three and then two storey). It would have a height to eaves of 7.25m and a height to ridgeline of 9.65m. Whilst this would be higher than No. 1 (eaves height of 3.15m and ridgeline height of 6.1m), given a separation distance of 7.65m, the proposal being setback from the front of No. 1, and the intervening garage, the proposal would not appear dominant or overbearing to the occupants of No. 1. There are two high level first floor side windows (height of over 2.5m above floor level) on the proposed development and none on the side roof of No. 1, and therefore no overlooking or loss of privacy would result. A condition should be attached to any planning permission granted removing permitted development rights for any further first floor side windows in this location.
- 4.6 Rosalyn House care home and No. 25 Whitehouse Close would be positioned on the opposite side of the street at a minimum distance of 17m. Given this separation, the occupants of these properties would not suffer any loss of amenity from the proposal.
- 4.7 The proposed building and the apartments within would be built using design principles to enable all residents of the building, along with members of the community, to access the facilities. This includes the incorporation of dementia needs into the building. All habitable rooms would have windows.
- 4.8 The application is accompanied by a Noise Impact Assessment (Cass Allen, 14 June 2016). The report recommends that mitigation is required against road traffic, noise from external plant, and noise from deliveries / service vehicles, to protect potential occupants of the scheme. Conditions

in this respect should be attached to any planning permission granted.

- 4.9 Section 5 of the Central Bedfordshire Design Guide states that within flatted developments, each apartment must have access to private open space. Various private shared gardens, including a large enclosed garden to the rear of the site adjacent to the boundaries with properties in Clarkes Way and Whitehouse Close, and a roof garden, would be provided. Also, some of the apartments would benefit from balconies. Furthermore, The Green - adjacent to the site - provides a substantial area of public open space which residents can benefit from.
- 4.10 The proposal is therefore in accordance with Policy BE8 of the SBLPR which requires proposed development to not have an unacceptable adverse effect upon residential amenity, and Section 5 of the Design Guide.

5. Highway Considerations

- 5.1 In accordance with the Central Bedfordshire Local Transport Plan; Appendix F, the parking standard for retirement homes is 1 space per unit plus 1 space for every 4 units for visitors. This results in a requirement of 220 spaces for the residential portion of the proposal, whilst the retail element warrants an additional 19 spaces. With a provision of 106 on-site parking spaces, clearly these standards have not been met. However, it should be noted that use would not be as high as that for private dwellings, and the car parking provision is therefore acceptable.
- 5.2 Elements of the proposal adjacent to the eastern boundary of the site, for example pedestrian areas and access to car parking spaces, encroach into the public highway, i.e. a site access road adjacent to Red House Court and The Red House. Highways (Development Management) do not object to the stopping up of the public highway.
- 5.3 The Transport Statement includes a Travel Plan Framework (TPF) for the proposed development which outlines the content that will be provided within the full Travel Plan (TP). The requirement for a full TP, setting out site specific initiatives aimed at improving the availability and choice of travel modes to and from the development, should be the subject of a condition attached to any planning permission granted.
- 5.4 The application is accompanied by a Transport Statement (Stuart Michael Associates, June 2016) which provides evidence that a refuse vehicle and articulated vehicle can both enter and exit the undercroft parking area to the rear of the retail units. These vehicles measure 3.8m and 4.0m high respectively, whilst the clearance into the undercroft area only measures 3.8m. It would be reasonable to conclude that the vehicles that are required to service the site would be unable to access the service area.
- 5.5 Furthermore, the proposed vehicular access from Clarkes Way would only have a headroom of 2.6m, so neither a Light Goods Delivery Vehicle or an ambulance could take access. As a result deliveries to this area would be from the kerb side. However, there are parking bays proposed along the Clarkes Way frontage so wherever a delivery vehicle parks, it would be

causing an obstruction. Also, refuse bins could only be collected from a refuse vehicle parking on Clarkes Way. Considering the distance and number of refuse collection containers there are, the operation to empty the bins could take anything between 45 and 90 minutes.

5.6 The above issues in respect of the inability of various types of vehicles to access the site are, at the time of writing, being given further consideration by the agent on behalf of the applicant.

5.7 Notwithstanding the resolution of the issue concerning vehicles accessing the site, the proposal is otherwise acceptable in highway terms, subject to compliance with conditions in respect of the provision of details regarding alterations on the public highway, the closure of existing redundant accesses, submission of a Travel Plan, the maximum gradient of all vehicular accesses, the surfacing of on site vehicular areas, a scheme for the parking of cycles, and a scheme detailing provision for on site parking for construction workers.

6. Archaeological Impact

6.1 The proposed development site is located within the core of the historic settlement of Houghton Regis (HER 16988), a heritage asset with archaeological interest as defined by the National Planning Policy Framework (NPPF).

6.2 The history of the site and its surroundings is documented in the Archaeology response above.

6.3 The application is accompanied by two documents relating to the archaeological resources of the site: an Archaeological Evaluation and Heritage Statement (Albion Archaeology, 12 May 2016) and a Heritage Statement (Albion Archaeology, 8 August 2016). These documents conclude that the site has low to moderate potential to contain archaeological remains dating to the medieval period and negligible to low potential for earlier periods. This is a reasonable conclusion based on the available evidence.

6.4 The proposed development will result in the destruction of any archaeological remains within the site which will result in a loss of significance to the heritage asset with archaeological interest; however, because the survival of archaeological remains is likely to be limited the loss of significance will consequently be small. The loss of significance to the heritage asset will be similarly small and not enough to justify any further archaeological investigation in advance of development. As such, there is no objection to the proposal on archaeological grounds.

7. Ecological Impact

7.1 The application is accompanied by an Ecological Appraisal providing details of an Extended Phase 1 Habitat, Preliminary Protected Species Survey and Initial Impact Assessment (FPC Environment and Design, July 2016). The site was found to be dominated by habitats, such as hardstanding and buildings, that are of low value nature conservation interest. Surveys did not find bats present on the site. The proposal would not impact on a protected species.

7.2 Paragraph 6.5 in the Appraisal refers to the layout offering opportunities to provide enhancements for local habitats and fauna. The proposed roof garden is welcomed; further opportunities to secure a net gain for biodiversity in line with the National Planning Policy Framework, paragraph 109, should be secured. To this end, a condition should be attached to any planning permission granted requiring measures such as the inclusion of nectar rich species to benefit pollinators, the use of bird and bat boxes, and the provision of feeding stations for birds.

8. Contamination

8.1 The application is accompanied by a Preliminary Contamination Risk Assessment (FWS Consultants, January 2016). This identifies that no significant risks and no mitigation measures are required in respect of gas and vapour, groundwater and surface water. However, in respect of ground contamination, further concrete and made ground investigations are required in the location of former buildings, in the north and south east of the site, including the smithy. To this end, a condition should be attached to any planning permission granted requiring further intrusive investigations to establish the extent of any contamination, and if necessary a remediation strategy to deal with the risks associated with contamination of the site.

9. Affordable Housing and Section 106 Requirements

9.1 An Affordable Housing: Guidance Note for Central Bedfordshire (South Area) was endorsed by Central Bedfordshire Council's Executive on 5 April 2016 as interim guidance whilst the Central Bedfordshire Local Plan is being prepared. This states a proposed target of 30% affordable housing on qualifying sites.

9.2 Of the 168 independent living units proposed, 84 would be affordable rent and 57 shared ownership, with the remaining 27 market units. The rent and shared ownership apartments would be a range of one and two-bedroom. The development would therefore provide far in excess of a policy complaint scheme, i.e. 83.9%, from an affordable housing perspective.

9.3 The only contribution requested, to be secured through a Section 106 legal agreement, is from the Bedfordshire Clinical Commissioning Group (BCCG) and provides a response for GP Core Services. The response states that if the development materialises, it would affect Houghton Regis Medical Centre, which is already operating at capacity and has a very limited ability to accept new patients. As detailed in the response above, an overall contribution of £118,910 is sought, or £708 per dwelling.

9.4 However, it should be noted that the proposed development would be designed to meet the health and social care needs of older people, many of whom would have health needs (long term conditions) and disabilities, including dementia. This is in line with a Central Bedfordshire Health and Social Care system wide approach to reducing reliance on use of residential and nursing homes. The scheme is designed to reduce cost to

the Health and Social Care system, by enabling people to live independently and well for longer. Currently there is substantial under-provision of older person's specialist accommodation within Houghton Regis.

- 9.5 The Council has a clear policy position that applicants must have a local connection to Central Bedfordshire. The people who live in the scheme are more than likely to be current patients of the health Centre in Houghton Regis, and as such would not be an additional pressure to the health system. Whilst it is recognised that people moving into homes vacated by people moving into the proposed development may not currently live locally and therefore would create an additional demand on the local health system, overall given the expected reduction in demand resulting from the proposal, it is not considered that this factor justifies a contribution towards GP Core Services.
- 9.6 The scheme includes two Re-ablement Suites, which will enable people to return home from hospital and regain their independence, so costing the health and social care economy less money.
- 9.7 The wider benefits of the scheme in reducing social isolation and promoting wellness means that there will be less demand on GPs because people are healthier and when they are unwell or have conditions which need to be managed, the wrap around care offered by the scheme would help to mitigate the demand.
- 9.8 The provision of affordable housing, far in excess of policy compliance of 30%, should also be noted. Clearly this makes the scheme less economically viable than a proposal with a higher percentage of market units.
- 9.9 In view of the above factors - in particular the proposal meeting the health and social needs of older people, the potential occupants of the scheme currently living locally, and the lack of additional demand on the health system - it is not considered that a contribution towards GP Core Services meets the following tests for planning obligations outlined in the National Planning Policy Framework, paragraph 204:
- necessary to make the development acceptable in planning terms; and
 - fairly and reasonably related in scale and kind to the development.
- 9.10 Therefore a financial contribution towards GP core services should not be sought.

10. Other Considerations

10.1 Response to Town Council concerns

- 10.2 The matters raised in respect of the height of the building are considered in the discussion above.
- 10.3 There is an existing zebra crossing of the High Street; the consultation response from Highways Development Management does not refer to the

need for a controlled crossing.

- 10.4 A Heritage Statement (Albion Archaeology, 8 August 2016) accompanies the application.
- 10.5 A search has been undertaken which confirms that the access road adjacent to Red House Court and The Red House is publicly maintained highway.
- 10.6 Response to neighbour objections
- 10.7 The matters raised in respect of the proposal being overbearing and dominant, its design, the size of the building and its materials, how the proposal relates to the High Street and the village green, car parking, and the impact of additional traffic and pedestrians.
- 10.8 The proposal does not include a vehicular access onto Whitehouse Close. There is a proposed pedestrian access to the rear of retail unit 1; this is for emergency use only. For the avoidance of doubt, a condition should be attached to any planning permission granted to prevent general use. There are double yellow lines on Whitehouse Close which extend beyond where the proposed development would front this road. In view of these factors, it is not considered that the proposal would result in overspill or convenience parking in Whitehouse Close.
- 10.9 Any proposal for future re-generation of Houghton Regis town centre, for example, Bedford Square, would be considered on its own merits.
- 10.10 Public Art
- 10.11 The proposed development is of a scale and character to offer numerous opportunities for a series of artistic interventions to create an exemplar scheme in terms of bespoke design and detail and engender a sense of place for new and existing communities. A condition should therefore be attached to any planning permission granted requiring the submission of a Public Art Plan.
- 10.12 Sustainable Drainage
- 10.13 Conditions should be attached to any planning permission granted in respect of the detailed design for the surface water drainage for the site management and maintenance based on sustainable drainage principles, and requiring a Management and Maintenance Plan for the entire surface water drainage system.
- 10.14 Sustainable Growth
- 10.15 The Sustainable Growth Officer requests that conditions in respect of a water efficiency standard and a minimum 10% energy demand reduction from baseline of Part L of the Building Regulations are attached to any planning permission granted. However, such conditions are not considered necessary as these are matters which will be dealt with

through the building control process.

10.16 Human Rights issues

10.17 The proposal raises no Human Rights issues.

10.18 Equality Act 2010

10.19 It is acknowledged that the building has been designed to ensure that it adopts inclusive design principles to enable all residents of the building, along with members of the community, to access and benefit from the facilities. Furthermore, the building and landscape design incorporates dementia needs. An informative will be attached to any Listed Building Consent granted drawing the attention of the applicant to their responsibility under The Equality Act 2010.

Recommendation:

That Planning Permission be GRANTED subject to the following:

RECOMMENDED CONDITIONS

- 1 The development hereby permitted shall begin not later than three years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 2 External material samples shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the development is carried out in a manner that safeguards the historic significance and traditional character of the site's listed buildings and to safeguard the character and appearance of the Conservation Area and its immediate setting of which the site is part.

- 3 An external finishes schedule shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the development is carried out in a manner that safeguards the historic significance and traditional character of the site's listed buildings and to safeguard the character and appearance of the Conservation Area and its immediate setting of which the site is part.

- 4 Notwithstanding the details submitted with the application, and prior to commencement of the constructional phase of the development hereby approved, details of the following in respect of all proposed new and/or altered boundary enclosure structures shall be submitted to and approved in writing by the Local Planning Authority and the approved development shall be undertaken thereafter strictly in accordance with the approved details-

– (brick wall and wall-top railings) - drawn elevation detail at 1:10; drawn

elevation and layout plan at 1:50;

- (Red House garden wall) – drawn detail at a scale between 1:10 and 1:20 in elevation and section, showing the method of the formation of the proposed decorative brick arch gate opening;
- Masonry wall details, including coping type, brickwork bond and mortar jointwork finishing.

Reason: To ensure that the development is carried out in a manner that safeguards the historic significance and traditional character of the site's listed buildings and to safeguard the character and appearance of the Conservation Area and its immediate setting of which the site is part.

- 5 Notwithstanding the details submitted with the application, full details of all new gates, timber and metal bollards and exterior lighting installations proposed to be installed as part of the development hereby approved shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of development on site, and the approved development shall thereafter be implemented strictly in accordance with the approved details.

Reason: To ensure that the development is carried out in a manner that safeguards the historic significance and traditional character of the site's listed buildings and to safeguard the character and appearance of the Conservation Area and its immediate setting of which the site is part.

- 6 Notwithstanding the details submitted with the application, and prior to commencement of the constructional phase of the development hereby approved, a method statement and specification detailing fully the proposed method of construction of the proposed natural stone cobble/river washed pebble hard landscape surfacing hereby approved shall be submitted to and approved in writing by the Local Planning Authority and the approved development shall thereafter be implemented strictly in accordance with the approved details.

Reason: To ensure that the development is carried out in a manner that safeguards the historic significance and traditional character of the site's listed buildings and to safeguard the character and appearance of the Conservation Area and its immediate setting of which the site is part.

- 7 Notwithstanding the details submitted with the application and prior to the laying out of the cobbled hard landscape surfaces hereby approved, a finished sample section demonstrating clearly the materials to be used (including edgings and representative cobbles/pebbles) and the manner of surfacing bedding and finishing, shall be constructed on site, and retained, for agreement in writing by the Local Planning Authority, and the approved works shall be implemented thereafter in strict accordance with the approved details.

Reason: To ensure that the development is carried out in a manner that safeguards the historic significance and traditional character of the site's

listed buildings and to safeguard the character and appearance of the Conservation Area and its immediate setting of which the site is part.

- 8 Development shall not begin until details of the alteration on the public highway have been approved by the Local Planning Authority and no building shall be occupied until that junction has been constructed in accordance with the approved details.

Reason: In order to minimise danger, obstruction and inconvenience to users of the highway and of the proposed estate road.

- 9 Before the new accesses are first brought into use, any existing accesses within the frontage of the land to be developed, not incorporated in the access hereby approved shall be closed in a manner to the Local Planning Authority's written approval.

Reason: In the interest of road safety and to reduce the number of points at which traffic will enter and leave the public highway.

- 10 The development shall not be occupied until a Full Travel Plan has been submitted to and approved in writing by the Council, such a Travel Plan to include details of:

- Predicted travel to and from the site and targets to reduce car use.
- Details of existing and proposed transport links, to include links to both pedestrian, cycle and public transport networks.
- Measures to minimise private car use and facilitate walking, cycling and use of public transport.
- Timetable for implementation of measures designed to promote travel choice.
- Plans for monitoring and review, annually for a period of 5 years at which time the obligation will be reviewed by the Council.
- Details of provision of cycle parking in accordance with Council guidelines.
- Details of marketing and publicity for sustainable modes of transport to include site specific travel information packs, to include:
 - Site specific travel and transport information;
 - Travel vouchers;
 - Details of relevant pedestrian, cycle and public transport routes to/ from and within the site;
 - Copies of relevant bus and rail timetables.
- Details of the appointment of a travel plan co-ordinator.
- An Action Plan listing the measures to be implemented and timescales for this.

No part of the development shall be occupied prior to implementation of those parts identified in the Travel Plan. Those parts of the approved Travel Plan that are identified as being capable of implementation after occupation shall be implemented in accordance with the timetable contained therein and shall continue to be implemented as long as any part of the development is occupied.

Reason: To reduce reliance on the private car by promoting public transport and sustainable modes of transport.

- 11 The maximum gradient of all vehicular accesses onto the estate roads shall be 10% (1 in 10).

Reason: In the interests of the safety of persons using the access and users of the highway.

- 12 Before the premises are occupied all on site vehicular areas shall be surfaced in a manner to the Local Planning Authority's approval so as to ensure satisfactory parking of vehicles outside highway limits. Arrangements shall be made for surface water from the site to be intercepted and disposed of separately so that it does not discharge into the highway.

Reason: In order to minimise danger, obstruction, and inconvenience to users of the highway and of the premises.

- 13 Before development begins, a scheme for the parking of cycles on the site shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall be fully implemented before the development is first occupied or brought into use and thereafter retained for this purpose.

Reason: To ensure the provision of adequate cycle parking to meet the needs of occupiers of the proposed development in the interests of encouraging the use of sustainable modes of transport.

- 14 Development shall not commence until a scheme detailing provision for on site parking for construction workers for the duration of the construction period has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented throughout the construction period.

Reason: To ensure adequate off street parking during construction in the interests of road safety.

INFORMATIVE NOTES TO APPLICANT

1. In accordance with Article 35 (1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015, the reason for any condition above relates to the Policies as referred to in the South Bedfordshire Local Plan Review (SBLPR) and the National Planning Policy Framework (NPPF).
2. This permission relates only to that required under the Town & Country Planning Acts and does not include any consent or approval under any other enactment or under the Building Regulations. Any other consent or approval which is necessary must be obtained from the appropriate authority.

Statement required by the Town and Country Planning (Development Management Procedure) (England) Order 2015 - Part 6, Article 35

The applicant and the Council engaged in discussion and negotiation at pre-application and application stage which led to improvements to the scheme. The applicant and the Council have therefore acted pro-actively to secure a sustainable form of development in line with the requirements of the Framework (paragraphs 186 and 187) and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015.

DECISION

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