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Our ref: OPP-01464
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Date: 28/05/21

Bedford Borough Council
Planning Policy Team
Borough Hall
Cauldwell Street
Bedford
MK42 9AP

Dear Sir/Madam

CALL FOR SITES– NATURAL ENGLAND SUPPLEMENTAL INFORMATION SUBMISSION LAND SOUTH-WEST OF RUSHDEN

I write on behalf of my client the St Albans Diocesan Board of Finance who submitted land south-west of Rushden, for consideration as part of the Local Plan Review.

Following this submission, my client was contacted by a member of the policy team in relation a response submitted by Natural England about this site. The opportunity to supplement the site submission on this specific matter was offered and as such my client instructed Aspect Ecology to review the comments raised by Natural England and prepare a response.

The documentation included as part of this submission is:

- This covering letter;
- Information to Inform a Plan-level Habitats Regulations Assessment for the ‘Proposed Allocation of the Site (ref: 1006163 HRF vf CL), prepared by Aspect Ecology;
- Technical Briefing Note: Preliminary Ecological Survey Results: Constraints, and Opportunities (ref: 1006163 TN01 ECN vf), prepared by Aspect Ecology.

Natural England Response

As part of their response, Natural England have identified that the site is *potentially* a high-risk allocation and that as part of the site selection process further information and assessment is required in order to address concerns over the potential for ‘likely impacts’ on the Upper Nene Valley Gravel Pits SPA designation.

In particular, the comments received identify that the plan-level HRA should identify mitigation measures to address the recreational pressure impacts and possible loss of functionally linked land, such as SANG (Suitable Alternative Natural Greenspace).

Aspect HRA Report

Aspect Ecology have prepared a report which assesses the potential for likely significant effects on the Upper Nene Valley Quarry Pits SPA/Ramsar to arise under the proposals.

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Where potential for likely significant effects on the SPA have been identified, the report sets out further consideration in relation to the required plan-level 'Appropriate Assessment' in order to determine whether the proposed allocation of the site would lead to any adverse effects on the integrity of the designation.

The report concludes that appropriate mitigation measures would be possible as part of a suitably designed development masterplan in order to avoid any likely significant effects on the interest features of identified European level ecological designations. All of these would be achievable under a suitably designed masterplan and detailed development scheme at the site, and could be further secured at the planning application stage.

Accordingly, the use of suitable wording as part of any allocation policy in order to ensure the inclusion of such measures would be sufficient to ensure that the proposed allocation of the site would not lead to any adverse effect on the integrity of the Upper Nene Valley Gravel Pits SPA/RAMSAR (or any other identified European Site).

Technical Briefing Note – Preliminary Ecological Survey Results

This note has been prepared by Aspect Ecology to provide initial information about the nature of the habitats and ecological features at the site in order to inform the proposed allocation.

The site was subject to initial ecological survey work undertaken during May 2021. As part of this assessment limited ecologically valuable features were found to be present, including those likely qualifying as Priority Habitats (e.g. hedgerows). This was largely the result of the internal areas of the site being dominated by intensively managed arable land and a substantial area of allotments. Opportunities for faunal species were limited across the majority of the site, evidence of minor use by badgers and potential for use by bats and bird species was noted. On the basis of the currently available information, and given the scale and nature of the site, Aspect Ecology note that species could likely be adequately accommodated and safeguarded, and that there is the opportunity to enhance the site in the long-term as part of any suitably designed development proposals at the site.

Overall, the note concludes that habitats and species present at the site do not represent any over-riding ecological constraints associated with the proposed strategic development of the site.

Conclusion

The supporting documentation prepared by Aspect Ecology has confirmed that the allocation of my client's site for development would not lead to any adverse effect the integrity of the Upper Nene Valley Gravel Pits SPA/RAMSAR (or any other identified European Site) and that appropriate mitigation can be included as part of the wording of policy in order to ensure this. The habitats and species present at the site do not represent any over-riding ecological constraint to development of the site.

Hopefully this detail is helpful in your consideration of the site. Should you have any queries in respect of this submission, please do not hesitate to contact me.

Yours sincerely,

Senior Planner