

Hallam Land Management – Response to Site Assessment Proforma ID 975: Land East of Clapham			
Site Assessment Criteria		Bedford Borough Council's Assessment	Hallam Response
1a. Within or adjoining UAB SPA or built form of a small settlement	?	The site is within or adjoining a defined settlement policy area or within the built form of a small settlement.	Agree.
1e. Outside, adjoining or within the air quality management area?	+	The site is not within or adjoining the air quality management area.	Agree.
2a. Within or adjoining site of nature conservation importance	+	The site is not within or adjoining a site of nature conservation importance.	Agree.
2b. In an area where protected species are known or likely to exist?	xx	Protected species recorded on the site.	Readily resolved through ecology survey and mitigation strategy and extensive opportunities for green infrastructure and new habitat creation on largely arable agricultural site. Impact on protected species should be a neutral feature in consideration of this site.
2c. Potentially able to achieve a net gain in biodiversity?	?	Uncertain or insufficient information.	Development seeks to retain where possible and enhance existing landscape features as part of a wider landscape strategy. A key objective will be to secure biodiversity net gain. The scale and nature of the site allow for extensive opportunities for green infrastructure and new habitat creation on largely arable agricultural site. The particular characteristics of the site mean that the site should be assessed as having a positive (not neutral) benefit on terms of its ability to achieve net gain.
2d. Able to link into the green infrastructure opportunity network?		Nothing chosen.	Site lies next to the Green Infrastructure Network to the east of Green Lane and has the potential to be linked. The site proposal itself is intended to integrate green infrastructure comprising formal open space and informal spaces, including natural green space. The particular characteristics of the site mean that the site should be assessed as having a positive (not neutral) benefit on terms of its ability to link to, and deliver, green infrastructure (see previous call for sites submission for details).
3a. Proposing a renewable energy scheme or extra energy efficiency standards?		Nothing chosen.	None proposed, although requirements are anticipated through the Future Homes Standard before 2025. In this context there is the opportunity for the proposal to be guided by principles for development to be 'low carbon' ready.

<p>4a. Likely to impact on designated or non-designated heritage assets or their settings? For more detailed assessment see Site Pro formas supporting document. www.bedford.gov.uk/LocalPlan2040</p>	x	<p>The proposal has the potential to cause harm to heritage assets. This harm may range from low to high. There may be options to avoid, reduce or mitigate this harm and where sites have not been ruled out altogether for other reasons, further assessment will be undertaken to more fully explore impacts on significance and options for harm reduction and mitigation. This further assessment may ultimately lead to the conclusion that the site should not be allocated.</p>	<p>Hallam considers that the development can mitigate against any harm of the development on the setting of the Church and this should not be a reason that the site is not allocated. Indeed well designed development (as set out in the previous call for sites submission) indicates how development may enhance the setting of the church.</p> <p>Enhanced pedestrian access and the provision of dedicated car parking for the church would also be benefits of the proposal.</p> <p>The particular characteristics of the site, and design opportunities (see previous call for sites submission for details), mean that the site should be assessed as having a positive (not negative) benefit on terms of impact (and indeed enhancement of) designated and non designated assets.</p>
<p>Conservation Comments (informs 4a above)</p>		<p>Large scale development with the potential to impact on the setting of several listed buildings. Site located adjacent to St Thomas's (grade I), with access located close to churchyard on The Green. Could result in a moderate level of less than substantial harm to the building, as the Church draws strongly on its rural setting to north which is likely to be lost through the proposal. Late 19th century farm buildings associated with Church Farm (non-designated heritage assets) located within site.</p>	<p>The proposal seeks to mitigate the potential harm to the setting of the Church by providing a view corridor – envisaged as a tree lined avenue or similar through the site towards the Church and creating an area of open space to the immediate north of the Church.</p> <p>Although Hallam does not agree with the value of the Church Farm buildings in contributing to the setting of the Church, there may be scope to consider retaining the farm buildings as a setting feature.</p> <p>The particular characteristics of the site, and design opportunities (see previous call for sites submission for details), mean that the site should be assessed as having a positive (not neutral) benefit on terms of impact (and indeed enhancement of) on conservation.</p>
<p>Archaeology Comments (informs 4a above)</p>		<p>Potential high harm to (?)locally significant archaeological remains = low/moderate overall impact?: Known heritage assets of archaeological interest within site. Southern half of site already subject to some archaeological investigation which identified Iron Age and Roman settlement, with some later medieval and post-medieval activity. Part of the medieval settlement of Clapham Green also falls within the proposal area and the below ground remains of a 19th century farmstead. Moderate to high potential for previously unidentified heritage assets of archaeological interest. Limited potential for the proposal to impact upon the setting or settings of heritage assets of archaeological interest. If allocated, will require pre-determination archaeological evaluation.</p>	<p>Hallam considers that mitigation, as suggested would involve pre-determination archaeological evaluation.</p>

5a. Likely to increase future economic and employment opportunities?		Nothing chosen.	<p>Agreed, although development may have indirect benefits of supporting employment arising from greater support to local services.</p> <p>The ready accessibility of the site (including for pedestrians and cyclists) to the principal commercial focus and facilities of Clapham, will result in greater use of existing village centre shops, generally locally owned, with the specific characteristics and location of the site resulting in significant additional local economic benefits (in particular in relation to other locations).</p> <p>This should be assessed as a major (XX) positive benefit of the proposals.</p>
6a. Proposing a main town centre use in, on the edge or outside of a town centre?		Nothing chosen.	Agreed.
8b. Within the existing settlement form?	+	The site adjoins a defined settlement policy area or the built form of a small settlement.	Agreed. Moreover the site is well related to the core and heart of the settlement. It is correctly assessed as a benefit.
9a. On previously developed land?	x	The site is not previously developed land as defined in the NPPF.	Agreed, although this should not be justification to discount a site if brownfield sites are not available or sustainable or deliverable.
9b. On best and most versatile agricultural land ie grades, 1, 2 or 3a?	x	All or a majority of the site is best and most versatile agricultural land as defined in the NPPF.	The degree of impact must be balanced with wider considerations and in this context should not alone be justification to discount a site.
10a. Within a groundwater source protection zone?	0	The site is located within a source protection zone but the proposed use is unlikely to be a risk to water supplies.	Agreed.
11a. At risk of flooding?	+	The site is within flood zone 1 (areas that have been shown to be at less than 0.1% chance of flooding in any year).	Agreed.
15e. Connect highway without constraint?	?	Potential access requiring mitigation.	Hallam considers constraints can be resolved.
15f. Highway or junction capacity issues	x	Serious capacity constraint.	Hallam considers constraints can be resolved. See below.
Highway comments. For more detailed assessment see Site Pro formas supporting document. www.bedford.gov.uk/LocalPlan2040		There are two access points proposed: The Slade and Green Lane. Both are narrow roads which could be quite seriously adversely affected by additional traffic from a site of this size. There is some moderate traffic in the area which would almost certainly be made worse by this size development. Via The Slade access to the site there is a bus stop 160m away	<p>High level transport assessment work has been undertaken to demonstrate that the two access points and connecting roads have adequate capacity.</p> <p>Hallam, in view of concerns raised, has explored alternative options for a direct access from the High Street. A main primary access with</p>

	<p>where the number 51 bus provides a half-hourly service between Bedford and Oakley. Both proposed access points have adequate pavements which could easily be connected to by this new development. There is no specific cycle connectivity however there are several paved PRoWs in the area which would be suitable for cycling. The proposed vehicular accesses would need to be looked at in greater depth as both currently seem like they connect to roads which would not be able to handle the traffic from 500 new homes. A Transport Assessment should be produced to assess the significant impact this and neighbouring developments will have on local networks.</p>	<p>one / two additional secondary vehicular access would introduce greater optionality and therefore flexibility to ensure that sufficient access can be provided. Consultation with County Highways has confirmed that access solutions can be safely provided within the capacity of the local network and without serious impacts on the local transport network.</p> <p>Hallam agrees with seeking opportunities to maximise pedestrian and cycle connectivity, given the proximity of the site to local services and facilities and ensuring on-site provision of a primary school is highly accessible by active travel options.</p> <p>Maximising cycle connectivity is also considered to be essential given the proximity of the site (& Clapham itself) to Bedford Town Centre and Bedford railway station – which indeed underpins the importance of Clapham forming part of a “Greater Bedford” area for the purposes of supporting sustainable growth.</p> <p>The NPPF emphasises the importance of giving priority to development that supports pedestrian and cycle movements, addresses the needs of those with reduced mobility and creates places that are safe and secure and attractive. Therefore and given the location of the site, the opportunities to deliver and support sustainable transport, the site should be scored positively (X) in terms of its transport and highway considerations (particularly relative to other sites and locations)</p>
Contaminated Land	Nothing chosen.	Agreed.
Environmental Health	No noise concerns for housing but if other uses were considered the may affect existing residential.	Other uses may include a primary school which is not considered to generate any unacceptable noise impacts.
Minerals & Waste conflict of interest	No answer given	Hallam considers there are no conflicts.
Natural England Risks Opportunities	Does not pose risk	Agreed.
Mineral Safeguarding Area	Site does not fall within the boundary of a MSA.	Agreed.