



30 Warwick St. London, W1B 5NH
tel +44 (0)20 7399 5867

www.joneslanglasalle.co.uk

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

Our ref Wates/Wixams

Direct line [REDACTED]

Email [REDACTED]

Submitted via Email only to:
planningforthefuture@bedford.gov.uk

3rd September 2021

Dear Sir/Madam,

**BEDFORD BOROUGH COUNCIL LOCAL PLAN 2040 – SITE ASSESSMENT PROFORMAS,
HISTORIC ENVIRONMENT ASSESSMENT AND TRANSPORT ACCESS ASSESSMENTS JUNE -
SEPTEMBER 2021**
SITE ID: 1004, LAND SOUTH OF WIXAMS AND WEST OF A6

On behalf of our client Wates Developments Limited ('Wates'), we set out representations to the Bedford Local Plan 2040 Site Assessment Proformas Consultation. As requested, we have also enclosed the completed Draft Plan Response form. Our representations also relate to the associated Historic Environment Assessment and the Transport Access Assessment.

This response relates to site ID 1004 relating to land south of Wixams and West of the A6.

We set out our response to the site selection criteria assessments for the site within this letter and accompanying appendices. These appendices are as follows:

- 1) Aspect Ecology, Technical Briefing Note, dated August 2021.
- 2) Orion Heritage, Bedford Borough Council Regulation 18 Draft Local Plan Strategy Options and Draft Policies Heritage Technical Note (undated)
- 3) Lichfields, Economic and Wellbeing Benefits Assessment, ref 18690189v1
- 4) Response to Call for Sites Site Assessment Pro Forma and Transport Access Assessment, i-transport, dated 26 August 2021, ref: TW/JW/ITB15565-003b
- 5) Phase 1 Preliminary Risk Assessment, Ramboll, dated 23 August 2021, ref: 1620011691
- 6) Feasibility Noise Assessment, RSK Acoustics, dated 31 August 2021, Ref 206/0466/R1

Our response to the selection criteria assessments is as follows:



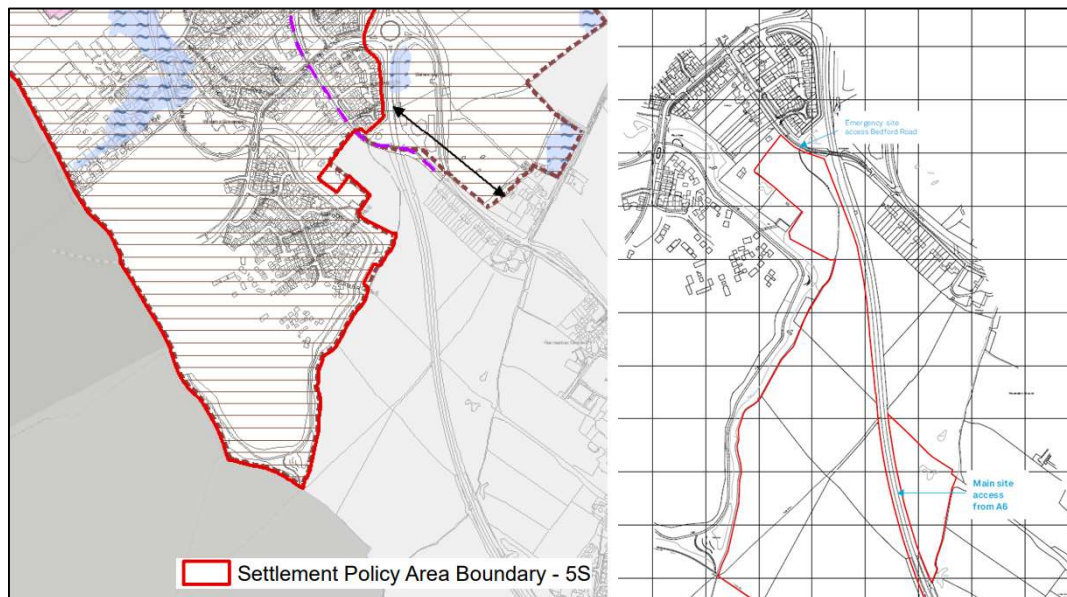
Site Selection Criteria 1a – Air Quality – Within or Adjoining UAB SPA or Built Form of a Small Settlement

This criteria includes an assessment whether or not the site is within or adjoining UAB (Urban Area Boundary) SPA (Settlement Policy Area) or built form of a small settlement and grades the site accordingly as either having a positive effect (+), uncertain effect (or insufficient information) (0) or a negative effect (x).

The assessment of the subject site identifies that the *'site is not within or adjoining the urban area or a defined settlement policy area, or within the built form of a small settlement'* scoring the site x ('negative effect').

The Bedford Local Plan 2030, adopted in January 2020 indicates the settlement policy area boundary of Wixams. The northern boundary of the site adjoins the settlement policy area so the site should be assessed as having a positive effect rather than a negative effect and scored '+' as a result.

The image below shows an extract from the adopted Local Plan Proposals Map (Wixams inset) on the left, and the site plan submitted with the Call for Sites submission in August 2020, on the right. The boundary of the settlement policy area direct adjacent to the subject site.



Bedford Local Plan 2030 (adopted January 2020) extract on the left, Site Location Plan (extract) submitted for the Call for Sites submission.

The site should be scored '+' as a result on the Site Assessment proforma.



Site Selection Criteria 2a - Within or adjoining site of nature conservation importance?

A Preliminary Ecological Appraisal (PEA) was submitted with the Call for Sites submission in 2020¹, and further work has been undertaken by Aspect Ecology on this point (Aspect Ecology, Technical Briefing Note, dated August 2021, see appendix 1 of this report). Both documents note that no ecological designations are located within or bounding the site, the nearest statutory ecological designation being Kings Wood and Glebe Meadows, Houghton Conquest Site of Special Scientific Interest (SSSI) and Local Nature Reserve (LNR), located approximately 2.2km to the south of the site, whilst the nearest non-statutory designation is Wilstead Meadows County Wildlife Site (CWS) located approximately 400m to the east of the site.

The proposed '+' rating set out under the Site Assessment is therefore considered to be appropriate.

Site Selection Criteria 2b - In an Area where Protected Species are Known or Likely to Exist?

This criteria considers whether the site is in an area where protect species are known or likely to exist which potential ratings ranging from '+' -where no protected species have been recorded or are likely on the site - to 'x' where protected species could be affected and 'xx' where protected species are or have been recorded on the site.

The site has been categorised 'xx' signalling protected species have been recorded.

Aspect Ecology have undertaken a Technical Briefing Note (dated August 2021) included as appendix 1 of this report which specifically responds to the BBC site Assessment.

This Briefing Note notes that the survey work undertaken at the site in January 2020 did confirm presence of the protected species Badger, with several setts recorded at the boundaries of the site. It also notes that the site is also considered to offer potential for protected species including bats, Dormouse, breeding birds, Great Crested Newt and reptiles and specific Phase 2 surveys are recommended at the planning application stage to determine presence/absence of such species.

However, it identifies that no Badger setts were recorded within the area of the site proposed for development, whilst potential for other faunal species is largely limited to field boundary habitats which could readily be retained under the proposals. It also identifies that there are also substantial opportunities for mitigation and enhancement within the site given the large areas of land available.

The report concludes on this point that the wording of the criteria does not take into account whether protected species are likely to be impacted. It notes this clearly disadvantages sites that have been subject to specific ecology work (with field surveys likely to identify one or

¹ Preliminary Ecological Appraisal, Aspect Ecology, report dated 11th August 2020, ref 5820 PrelEcoAp dv1/DM)



more protected species, whereas this is unlikely to be confirmed by a desk based appraisal only).

The Aspect work notes that given that the identified Badger setts are located outside of the proposed development area, whilst further information is required in relation to other protected species, a rating of '?' (uncertain or insufficient information) is considered to be more appropriate in this instance.

As a result we would request the pro forma assessment score is amended to '?' accordingly.

Site Selection Criteria 2c - Potentially Able to Achieve a Net Gain in Biodiversity?

This criteria assesses the potential ability of the site to achieve a net gain in biodiversity ranking the site '?', meaning there is uncertain or insufficient information.

Aspect Ecology's Technical Note (August 2021), included as appendix 1 indicates that there are substantial enhancement opportunities available under the proposals.

Aspect have used the Defra Biodiversity Metric 3.0 calculation tool has to quantify the level of Biodiversity Net Gain (BNG) that can be achieved under the proposed development.

Whilst the development proposals shown in the call for sites submission are illustrative and therefore requiring a number of assumptions to be made at this stage, the BNG assessment shows that a 31.96% biodiversity net gain could be achieved under the proposals. This only includes the northern part of the site (shown via a red line boundary in the Call for Submission Vision Document, August 2020) and excludes other land within Wates' control to the south. This additional land offers further opportunity for substation further net gain, over and over this 31.96% gain, as noted in the Aspect Briefing Note (para. 4.4).

The criteria assesses the potential ability of the site to achieve a net gain in biodiversity. Given the additional certainty applied by the BNG metric which shows the significant net gains which are likely to be achieved by the current proposals, the assessment score should be amended accordingly to achieve a '+' score.

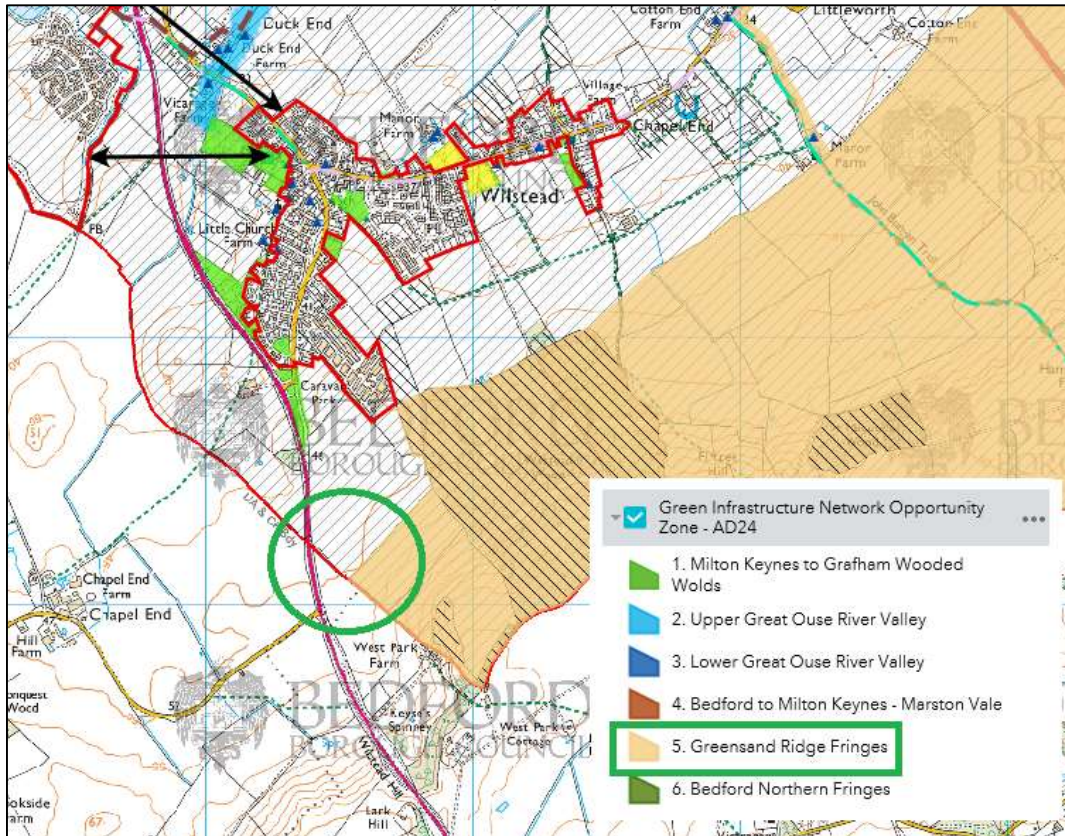
Site Selection Criteria 2d – Able to Link with the Green Infrastructure Opportunity Network

The assessment notes that 'no answer chosen' presumably meaning no answer was selected by Bedford Borough Council officers during the assessment of the site. Whilst the site is not within or directly adjoining the green infrastructure opportunity network, the site is within 250m of the Greensand Ridge Fringes Green Infrastructure Network Opportunity Zone (GINOZ), as can be seen from the adopted Local Plan extract below, and the Bedford to Milton Keynes – Marston Vale GINOZ located approximately 1,250m to the north.

As identified in the submitted Aspect Technical Note (August 2020, see appendix 1), the site is well located to contribute to a new green infrastructure link between these two zones, linked by existing green infrastructure including the Wixams New Town green corridors and clearly

able to enhance the network. The Technical Note identifies that the creation of new wetland, woodland and grassland habitats would correspond with the identified green infrastructure opportunities for the adjoining zones to the north and south.

As the site is able to link with the two GINOZs, north and south of the site, the Site Assessment Pro Forma should be amended to include a plus ('+') score.



Bedford Local Plan 2030 (adopted January 2020) extract (annotated) indicating proximity of the southern part of the subject site with the Greensand Ridge Fringes infrastructure network opportunity zone.

3a. Proposing a Renewable Energy Scheme or Extra Energy Efficiency Standards?

Again, the assessment notes 'no answers chosen', so it assumed the officer the assessing the site did not select an answer.

The site is not specifically proposed for a renewable energy scheme (assuming this refers to a standalone renewable energy development). However the proposed residential development will meet and where possible exceed any energy standards in the emerging Local Plan.

The draft local plan consultation document (dated June 2021) notes that policy 54 of the adopted Local Plan 2030 will be amended to reflect national standards in respect of energy

efficiency standards. It is anticipated that the proposed development will meet and/or exceed these future Local Plan standards (para 8.17, Local Plan June 2021 consultation document).

As a minimum the rating to be a '0' rating as no renewable generation scheme is proposed but efficiency standards will meet (or exceed) Local Plan standards.

4a. Likely to Impact on Designated or Non-Designated Heritage Assets or Their Settings?

This criteria assessment identifies that the proposal has the potential to cause harm to heritage assets. The site selection methodology notes that the criteria range from '++' ('the proposal is likely to have a major beneficial effect upon the significance of heritage assets') to 'xx' ('the proposal has the potential to cause very high harm to a heritage asset').

The assessment has scored the subject site as 'x' – having the potential to cause harm. The Council response notes the following:

“x 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.”

As well as on the site assessment proforma, additional heritage comments were made on the submitted sites. In relation to the subject site, these comments were as follows:

“Potential high harm to (?)locally significant archaeological remains = low/moderate overall impact?: The location of a possible medieval/post-medieval moated farmstead in the north-east corner of the study site. Two neighbouring sites produced settlement activity from the Iron Age, Roman and Saxo-Norman periods suggesting moderate to high archaeological potential. Pre-determination archaeological evaluation will be required as signalled by submitted heritage statement.

“Potential to have a minor impact on listed buildings in Wilstead, including Parish Church of All Saints (grade II). Also potential to impact on grade II listed buildings in Duck End. Impact likely mitigated by relative distance, intervening A6 and rural setting in closer proximity to assets. “*

As part of the Call for Sites consultation in 2020, the site was the subject of a historic environment desk-based assessment by Orion Heritage (March 2020)². This was undertaken in accordance with the CIfA Standards and Guidance for Historic Environment Desk-Based Assessments (2017). It included a site survey to assess the potential survival of as yet unrecorded archaeological non-designated heritage assets as well as the potential effects on the significance of nearby designated heritage assets.

² Historic Environment Desk Based Assessment, Orion, March 2020 ref PN2497/1

Following the publication of the site assessment by BBC as part of the Local Plan consultation, Orion Heritage have undertaken further work in the form of a review in the form of a Heritage Technical note³ which is included at appendix 2 of this report.

The technical note identifies that there are three designated heritage assets that could potentially be affected by the development of the site. These are The Vicarage Farmhouse (NHLE 1114196) in Duck End, The Parish Church of All Saints (NHLE 1321582) and The Little Church Farmhouse (NHLE 1114206), both in Wilstead. The assessment considered the potential effects of the proposed development of the site in the significance of these three assets. It concluded that while the site forms part of the wider rural landscape of these assets, the contribution that the site makes to the significance/experience of these assets is negligible to minor. The note concludes that the development of the site would consequently not harm the significance of the Vicarage Farmhouse, the Parish Church of All Saints and the Little Church Farmhouse.

The Bedford Borough Council Sites Assessment also references that there is the potential for listed buildings within the wider area to be impacted. However the Orion Technical Notes identifies that the proposed Wates development site is beyond the setting of these designated assets, as well two grade II buildings at Chapel End listed buildings. It states that the Ducks End listed buildings are both relatively distant from the site and are also separated by the later houses of the built-up area of Ducks End and that consequently, the proposed development would not result in any adverse harmful effects to the significance of these designated heritage assets.

In terms of archaeology, the Heritage Assessment (2020) considered the archaeological potential of the proposed development site. It established the following in relation to the potential for the non-designated archaeological remains on site:

- There are no prehistoric, Roman, Saxon or post-medieval archaeological remains recorded within the site.
- The cropmarks of a possible medieval/post-medieval moated farmstead have been recorded in the north-east corner of the site. The eastern part of the proposed roundabout for the proposed development will occupy the western part of the field within which this feature is located. The construction of this roundabout will not impact upon these remains.
- Although there are no Iron Age or Roman remains recorded within the site, based on the results of previous archaeological investigations to the east, west and north of the site, it is considered that there is a moderate potential for Iron Age to Romano-British remains. Should such remains be present, they are considered unlikely to be of more than local significance and therefore, will not be a design or a planning constraint. However, it is possible that no such remains are present within the site. In accordance with Bedford Borough Local Plan 2030 policy 42S clause ii, a programme of archaeological evaluation comprising geophysical survey and evaluation trenching will

³ Land West of Wixams, BBC Regulation 18 Draft Local Plan Strategy Options and Draft Policies Heritage technical Note, Orion (undated).



be undertaken to support a future planning application. Should these investigations have positive results (i.e. reveal archaeological remains), the layout of the scheme could be designed to avoid impacting upon them should the significance of the remains merit preservation or a programme of archaeological excavation and recording can be agreed with the Borough Council in accordance with policy 42S clause vii where such remains are considered to not merit preservation.

- The site of a former WWII military camp has been recorded in the south of the site. This is within the extensive area of proposed open space and so should remains associated with this camp survive, they will not be impacted by the proposed development.

Overall, the Heritage Technical Note concludes that the proposed development of the site will not result in adverse impacts on the significance of designated built heritage assets. It identifies that the two areas of the site where archaeological remains have been identified as surviving on site will not be impacted upon by the proposed development. The site has a theoretical potential to contain Iron Age and/or Roman non-designated archaeological remains but these are only likely to be of local significance.

The report notes that a programme of archaeological evaluation will be undertaken to inform the design of a future planning application and to inform the scope of any necessary archaeological mitigation works and as a result, the potential impact on built heritage and archaeology is not a reason for the site to not be allocated for development.

As a result of the above, it is our view the assessment should be revised to grade the site as a '0' *'appears to have no impact on heritage assets and their significance'*, rather than 'x', *'having the potential to cause harm'*.

5a. Likely to increase future economic and employment opportunities?

The criteria methodology notes that this part of the assessment considers the proposal's ability to increase future economic and employment opportunities.

The assessment notes that no answer is chosen. Whilst the proposal is not specifically 'employment' related as it is a residential proposal, there are significant economic benefits of the proposal. These have been outlined in an Economic and Wellbeing Benefits Assessment produced by Lichfields and submitted with the Call for Sites submission in August 2020⁴. This is re-included in this submission (appendix 3) and includes the following:

- 340 temporary construction jobs and 515 supported supply chain jobs;
- £55.5m capital investment in Bedford, generating £64.4m of economic output (GVA per annum).
- £2.3m first occupation expenditure and £13.1m annual resident expenditure on shopping and services.

⁴ Economic and Wellbeing Benefits Assessment, Lichfields, ref 18690189v1



- £2.8mm of new homes bonus payment to Bedford Borough Council and £758,000 annual receipt of Council Tax.

8b. Within the Existing Settlement Form?

The assessment concludes that the site is separated from a defined settlement policy area or the built form of a small settlement and assessed as 'x' as a result.

As noted in the response to 1a above, the northern boundary of the site adjoins the settlement policy area so the site should be assessed as positive rather than negative and scored '+' as a result.

15e. Connect highway without constraint?

15f. Highway or junction capacity issues?

The above two assessments note that there potential access/capacity issues requiring mitigation and give the site an associated rating of '?'. The accompanying highway comments note:

"THIS SITE REQUIRES MORE DETAILED REVIEW DUE TO ITS SCALE AND POSITVE/NEGATIVE IMPACTS ON SURROUNDINGS. Main vehicular access proposed from a new roundabout off the A6 to the east of the site. Emergency access from Bedford Road to the north. Pedestrian access â€" [sic] various points. All accessibility considerations are thoroughly described in the Transport Assessment. The A6 would require investment in order to be provide for improved pedestrian and/or cycle access. There are bus stops on Luton Rd, less than 400m from the site. Stakeholder discussion with bus providers to provide new routes or extensions to serve the site. Wixams has a small cycle infrastructure network, which could potentially be expanded."

Aside from the proforma assessment, the Council has undertaken a "Transport Access Assessment" for each of the sites coming forward in the Call for Sites submission consultation. This assessment scores the sites against five assessment criteria:

- Vehicle access constraints;
- Conflicts with traffic/highway capacity;
- Public transport accessibility;
- Pedestrian access/footway connectivity; and,
- Cycle route connectivity.

This assessment rated the site 2.4 out of 5 against various criteria, giving the site an Amber rating, but notes mitigation is feasible.



To support the promotion of the site, a Baseline Transport Appraisal was prepared and submitted in August 2020 as part of the Call for Sites submission which demonstrated that the site is deliverable in transport terms⁵.

Further technical work by i-transport has now been undertaken in the form of a Response to the Call for Sites Assessment⁶ to review in order to assess the highways matters further. The enclosed i-transport report at appendix 4 sets out why the Council's 'Transport Access Assessment' scores do not reasonably reflect the transport aspects / deliverability of the proposed site. Additional information is presented by i-transport alongside an alternative scoring assessment of the scheme, which concludes that the site should be considered as a deliverable site, and therefore attract a Green RAG rating.

It establishes the reason why the current BBC assessment does not fully address the scheme proposals or opportunities for access and sustainable movement.

It concludes that the site is located in a well-connected location, devoid of significant access constraints and can be intuitively integrated into the existing urban fabric of Wixams. The scheme offers a good opportunity to deliver sustainable development and a revised assessment of the scheme has been considered.

The current Transport Access Assessment scores, and the suggested revised scores are summarised below, taken from table 7.1 of the i-transport report:

Criteria	Access	Highway Capacity	Public Transport	Pedestrian Connectivity	Cycle Route Connectivity	Total
<i>Weighting</i>	25%	25%	20%	20%	10%	
BBC Assessment	3	3	3	1	1	2.4
Revised Assessment	5	3	3	4	3	3.7

The i-transport assessment presents a revised score for the site of 3.7 out of 5, increasing from the BBC score of 2.4. This represents a change in the overall assessment, moving from Amber to Green in the RAG Assessment. This more reasonably reflects the scheme proposal and site opportunity and demonstrates that in transport terms, the scheme should be considered positively.

Given the above, it considered that in terms of question 15e, the site should be considered as not having access constraints and scoring '+' as a result- i-transport consider give access issues a score of 5/5 in their assessment.

⁵ i-transport, Baseline Transport Appraisal, dated 14 August 2020, ref: TW/ITB15565-001c

⁶ i-transport, Response to Call for Sites Site Assessment Pro Forma and Transport Access Assessment, ref: TW/JW/ITB15565-003b



In relation to 15f, the i-transport assessment accepts that further, more detailed, assessments would need to be carried out as the proposals are developed and to consider the need for any further mitigation schemes. However, they identify at this stage there is sufficient evidence available to conclude that there are no overriding highway capacity constraints to the delivery of the site. We therefore consider the score should be reassessed as a '+' rating ('No highway or junction capacity constraints').

Other Considerations

Aside from the above issues, the Site Selection Methodology notes the assessment of constraints examines a number of additional factors to those considered against the sustainability objectives. These include contamination and Environmental Health. Each are considered below, in turn:

Contamination

The proforma assessment notes that '*No answers chosen*' presumably as the assessing BBC officer did not input a response to this question.

Ramboll have undertaken a Phase 1 Preliminary Risk Assessment in August 2021, which is included in appendix 5 of this report. The main objective of the assessment was to assess the potential for soil and groundwater contamination, both at and in the vicinity of the site, and their likely implications in a residential land use scenario.

In relation to potential contaminants that could impact the site's future development, the assessment notes that the site has been occupied by agricultural uses for its entire history and that there is only a moderate to low risk from contaminants. It concludes there are limited potential contaminant sources at the site.

Given the findings of the phase 1 assessment, given the limited risks associated with contamination, development will not be constrained by contamination issues and it is considered contamination should not preclude the site's allocation.

Environmental Health

The response to this question simply states "road noise from the A6". RSK acoustic consultants have prepared a feasibility noise assessment for the proposed development to establish if it is suitable for residential development (RSK, Feasibility Noise Assessment, dated 31st August 2021, report reference 206/0466/R1). A copy of the report is included in appendix 6 of this statement.

The assessment has shown that the majority of the site falls into the 'Negligible' and 'Low' risk categories detailed within the Acoustics, Ventilation and Overheating, residential design guide (AVO). A small portion of the site is within the 'High' Risk category, which RSK note is expected given the site is adjacent to the highway. Using the illustrative layout submitted as part of the submitted 'Vision Document' as part of the Call for Sites, the consultants note this would



impact upon only a very limited number of the units proposed on the eastern fringe of the development area.

RSK note that if dwellings are to be constructed within the high risk area, mitigation can be provided and that the exact extent of this would be assessed during the detailed design. The acoustic assessment however notes that general information regarding how this can be achieved has been provided within the report.

Given these findings, it is not considered that noise impacts are a constraint to development and noise should not be a constraint on the allocation of the site for development.

Conclusions

In summary, the site assessment for the subject site should be reviewed and revised in light of the technical work undertaken as part of both this current submission, read in conjunction with the Call for Sites submission in August 2020.

The subject site provides an outstanding opportunity to allocate a significant quantum of residential land on a sustainable site adjoining Wixams. The proposal is fully in accordance with several of the proposed development options identified in the current Local Plan review (Regulation 18 consultation), including the council-assessed most sustainable development strategy. The site is deliverable, available now and offers a suitable and sustainable location for new development, complimenting the emerging Wixams community.

We note that the site assessments are not complete and the full range of assessment criteria in the Site Selection Methodology have not been answered. We look forward to the opportunity to review the other site assessment criteria assessments once available.

Please note we have also submitted a separate representation to the concurrent Local Plan 2040 – Draft Plan Strategy Options and Draft Policies Consultation (June -September 2021) on behalf of our client, Wates.

We look forward to receiving confirmation that the representation has been received and registered. In the meantime, if you require any further information or clarification please do not hesitate to contact me on 07922 582704 or at tom.lamshead@eu.jll.com

Yours faithfully,

A large black rectangular redaction box covering the signature of the sender.

A black rectangular redaction box covering the name of the sender.

Associate Director
Planning, Development and Heritage
Jones Lang LaSalle Ltd



Appendix 1: Aspect Ecology, Technical Briefing Note, dated August 2021

Technical Briefing Note

Project: Land East of Wixams, Bedfordshire

Technical Briefing Note TN1: Response to Site Assessment Under Bedford Borough Local Plan Review

Date: August 2021

1. Introduction and Background

1.1. Aspect Ecology is advising Wates Developments in respect of ecological matters relating to land east of Wixams, Bedfordshire. The site is being promoted for residential development under the Bedford Borough Local Plan Review.

1.2. Following the Call for Sites submission under the Local Plan Review, Bedford Borough Council have published Site Assessments for each of the submitted sites¹. In relation to the land east of Wixams site, the following assessment has been made under the biodiversity and green infrastructure criteria:

2a) Within or adjoining site of nature conservation importance?

+ The site is not within or adjoining a site of nature conservation importance

2b) In an area where protected species are known or likely to exist?

xx Protected species recorded on the site

2c) Potentially able to achieve a net gain in biodiversity?

? Uncertain or insufficient information

2d) Able to link into the green infrastructure opportunity network?

Nothing chosen

1.3. The site has been subject to ecological survey work by Aspect Ecology in January 2020 as set out in the 'Preliminary Ecological Appraisal' (August 2020) which accompanied the Call for Sites submission. However, it is considered that the Council's Site Assessment does not accurately reflect the findings of this work, or the opportunities for biodiversity and green infrastructure under the proposals. Accordingly, this note provides further discussion of the relevant criteria in relation to the site.

2. Criteria 2a – Within or adjoining site of nature conservation importance?

2.1. As set out in the Preliminary Ecological Appraisal, no ecological designations are located within or bounding the site, the nearest statutory ecological designation being Kings Wood and Glebe

¹ Following the methodology set out in: Bedford Borough Council (July 2020) *Local Plan Review: Site Selection Methodology*.

Meadows, Houghton Conquest Site of Special Scientific Interest (SSSI) and Local Nature Reserve (LNR), located approximately 2.2km to the south of the site, whilst the nearest non-statutory designation is Wilstead Meadows County Wildlife Site (CWS) located approximately 400m to the east of the site. The site is not located within a SSSI Impact Risk Zone in relation to residential development.

2.2. As such, the '+' rating set out under the Site Assessment is considered to be appropriate.

3. Criteria 2b – In an area where protected species are known or likely to exist?

3.1. The survey work undertaken at the site in January 2020 did confirm presence of the protected species Badger, with several setts recorded at the boundaries of the site. The site is also considered to offer potential for protected species including bats, Dormouse, breeding birds, Great Crested Newt and reptiles and specific Phase 2 surveys are recommended at the planning application stage to determine presence/absence of such species. However, no Badger setts were recorded within the area of the site proposed for development, whilst potential for other faunal species is largely limited to field boundary habitats which could readily be retained under the proposals. There are also substantial opportunities for mitigation and enhancement within the site given the large areas of land available.

3.2. Likely on the basis of the above confirmed protected species presence, the site has been assigned a 'xx' rating. However, the wording of the criteria does not take into account whether protected species are likely to be impacted, and clearly disadvantages sites that have been subject to specific ecology work (with field surveys likely to identify one or more protected species, whereas this is unlikely to be confirmed by a desk based appraisal only).

3.3. Given that the identified Badger setts are located outside of the proposed development area, whilst further information is required in relation to other protected species, a rating of '?' (uncertain or insufficient information) is considered to be more appropriate.

4. Criteria 2c – Potentially able to achieve a net gain in biodiversity?

4.1. As indicated in the Preliminary Ecological Appraisal, there are substantial enhancement opportunities available under the proposals, with large areas in the southern part of the site available for new habitat creation.

4.2. To provide further detail on this matter, the Defra Biodiversity Metric 3.0 calculation tool has been used to quantify the level of biodiversity net gain that can be achieved under the proposed development. The results of this exercise are set out below and in the accompanying metric calculations (see Appendix 5820/1).

4.3. The metric takes account of the size, distinctiveness and ecological condition of existing and proposed habitat areas to provide a proxy measure of the present and forecast biodiversity value of a site, and therefore determine the overall change in biodiversity value.

4.4. To establish the habitat baseline, broad habitat areas have been identified based on the survey work undertaken at the site, with habitat condition based on the associated guidance. Given the early stage of the project, no specific detail has been worked up in regard to landscaping proposals, although broad habitat areas have been identified based on the illustrative Site Layout (Re-Format drawing no: F19146-RFT-01-XX-DR-A-0103: see Appendix 5820/2) to inform the post-development habitat creation, with a number of assumptions made based on comparative developments and what is realistic and feasible under the proposed scheme. The

Site Layout drawing shows a red line boundary relating to the northern part of the site which incorporates the area proposed for built development, whilst the large area of open space to the south of the site is shown with a blue line boundary. For the purposes of the metric calculations, the 'site habitat baseline' and 'site habitat creation' is based on the red line boundary only (shown at Plans 5820/BNG1 and BNG2), with the opportunity to provide further net gain within the remaining site area.

- 4.5. Calculations have been undertaken based on habitat areas only, rather than linear features (e.g. hedgerows), given that details of hedgerow retention and new planting are not shown under the broad site layout plan. However, it is likely that a substantial gain in linear features could be provided as part of the detailed layout.

Biodiversity Metric Results

- 4.6. The site is currently dominated by arable land and smaller areas of species-poor grassland of low distinctiveness, with habitats of medium distinctiveness limited to small areas of scrub and young woodland (see attached Plan 5820/BNG1). These scrub and woodland areas will be fully retained under the proposals, whilst there are substantial opportunities for new habitat creation within the large areas of open space around the edges of the built development area. Based on the illustrative site layout, the broad habitat creation categories of woodland/scrub, grassland and SUDS are identified (see attached Plan 5820/BNG2).
- 4.7. Given the illustrative nature of the current proposals, a number of assumptions are made in relation to the habitats to be created and likely habitat condition that can be achieved:
- For the areas shown as built development, a 70/30 split is assumed in terms of buildings/hardstanding and gardens. Based on experience of other schemes, between 30% and 50% of development parcels typically comprises gardens or other amenity space (depending on housing density), such that this is a precautionary assumption;
 - For broad areas of tree planting shown on the site layout plan, a 50/50 split is assumed in terms of woodland and mixed scrub creation;
 - For broad areas of grassland shown on the site layout plan, a 50/50 split is assumed in terms of species-rich wildflower grassland (assigned as other neutral grassland) and other grassland areas to be managed for amenity/recreational purposes (assigned as modified grassland). A larger area of species-rich grassland could readily be incorporated, such that this represents a precautionary assumption.
 - A moderate condition is assumed for habitats to be created within open space areas, which is considered to be appropriately precautionary based on the specific criteria and likely condition which can be achieved through appropriate management.
- 4.8. A summary of the habitat units under the baseline and post-development scenarios is set out below, together with the overall change in habitat units.

Baseline habitat units	54.32
Post-development habitat units	71.68
<i>Retained habitats</i>	<i>2.44</i>
<i>Habitat creation</i>	<i>69.24</i>
<i>Habitat enhancement</i>	<i>0.00</i>
Total net unit change	+17.36
Total net % change	+31.96%

4.9. As this sets out, it is considered that a 31.96% biodiversity net gain could be achieved under the proposals. Given this is based on a number of precautionary assumptions, whilst further gain could be delivered within the additional site area to the south, this is considered to be a robust assessment, and given the size of the site, is considered to represent a substantial gain at the local scale.

4.10. Accordingly, a rating of '+' (development of the site will enable the achievement of a net gain in biodiversity) can be assigned under the Site Assessment.

5. Criteria 2d – Able to link into the green infrastructure opportunity network?

5.1. No specific discussion of this matter was set out in the previous Preliminary Ecological Appraisal. Accordingly, further detail is set out below.

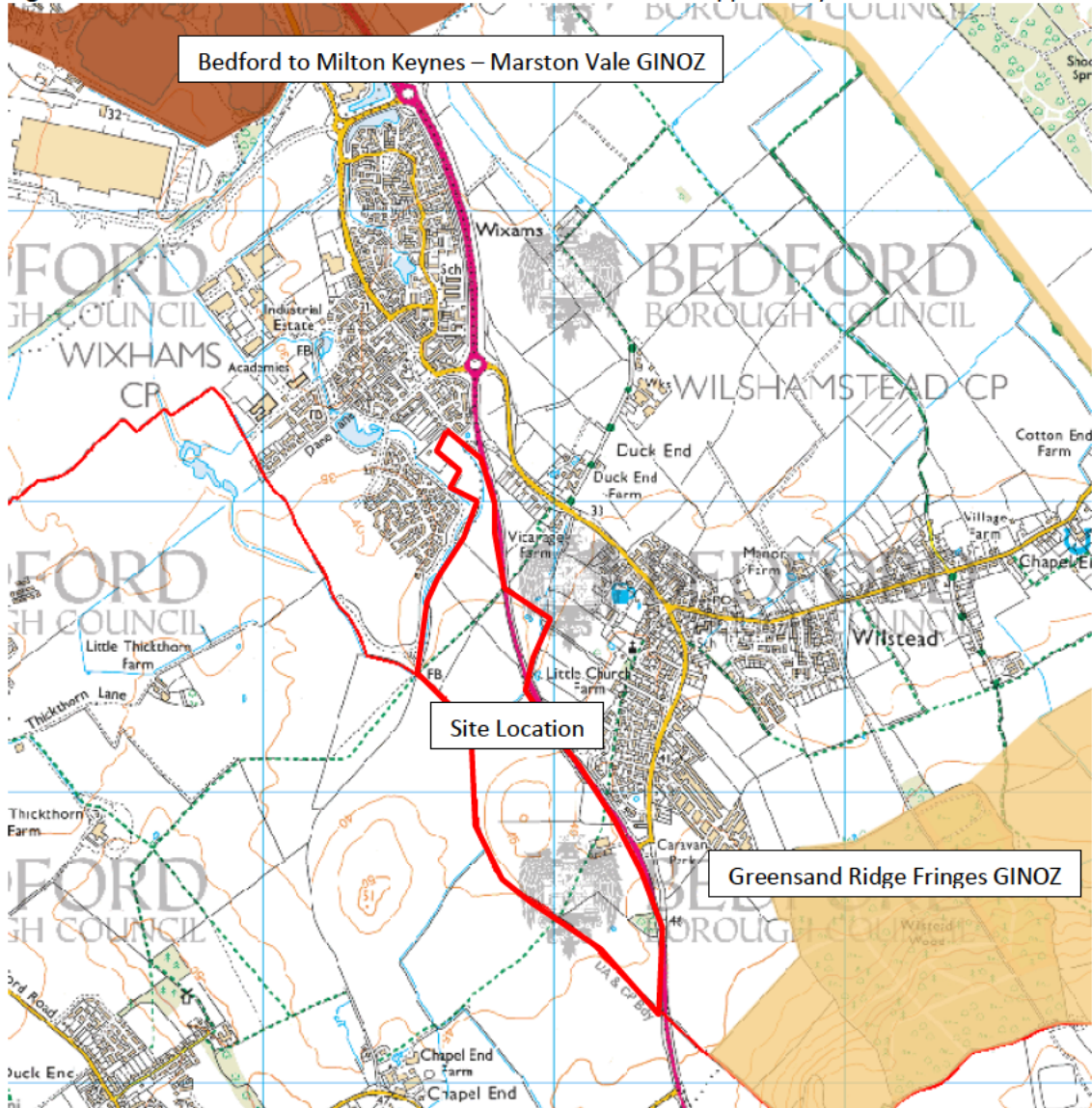
5.2. Based on a review of the Green Infrastructure Network Opportunity Zones (GINOZ) under the Bedford Borough Council Policies Map 2020, the site is located between two zones, with Bedford to Milton Keynes – Marston Vale GINOZ located approximately 1250m to the north, and Greensand Ridge Fringes GINOZ approximately 250m to the south (see Figure 1 below).

5.3. The Bedford Green Infrastructure Plan (November 2009) identifies Bedford to Milton Keynes – Marston Vale GINOZ as being dominated by industrial heritage associated with former brickworks and current brickpit landfill activities. Identified green infrastructure opportunities largely relate to wetland and woodland habitats.

5.4. Greensand Ridge Fringes GINOZ is described as being dominated by arable fields separated by woodland belts, historic hedgerows and hedgerow trees, together with ancient woodlands. Identified green infrastructure opportunities largely relate to woodland, scrub and grassland habitats.

5.5. On the basis of the above, it is evident that the site is well located to contribute to a new green infrastructure link between these two zones, linked by existing green infrastructure including the Wixams New Town green corridors and clearly able to enhance the network. In particular, creation of new wetland, woodland and grassland habitats (as indicated above in relation to biodiversity net gain) would correspond with the identified green infrastructure opportunities for the adjoining zones to the north and south.

Figure 1. Site location in relation to Green Infrastructure Network Opportunity Zones



5.6. The majority of the site is also located within an identified 'Network Expansion Zone' under the National Habitat Network shown on the MAGIC website, relating to existing lowland meadows.

5.7. Accordingly, a rating of '+' (the site is within or adjoining the green infrastructure opportunity network and able to enhance the network) can be assigned under the Site Assessment.

6. Conclusion

6.1. This note sets out a review of the relevant biodiversity and green infrastructure criteria informing the Site Assessment under the Bedford Borough Local Plan Review for the land east of Wixams site.

6.2. As set out in the relevant sections above, it is considered that the ratings under these criteria should be as follows:

2a) Within or adjoining site of nature conservation importance?

+ The site is not within or adjoining a site of nature conservation importance

2b) In an area where protected species are known or likely to exist?

? Uncertain or insufficient information

2c) Potentially able to achieve a net gain in biodiversity?

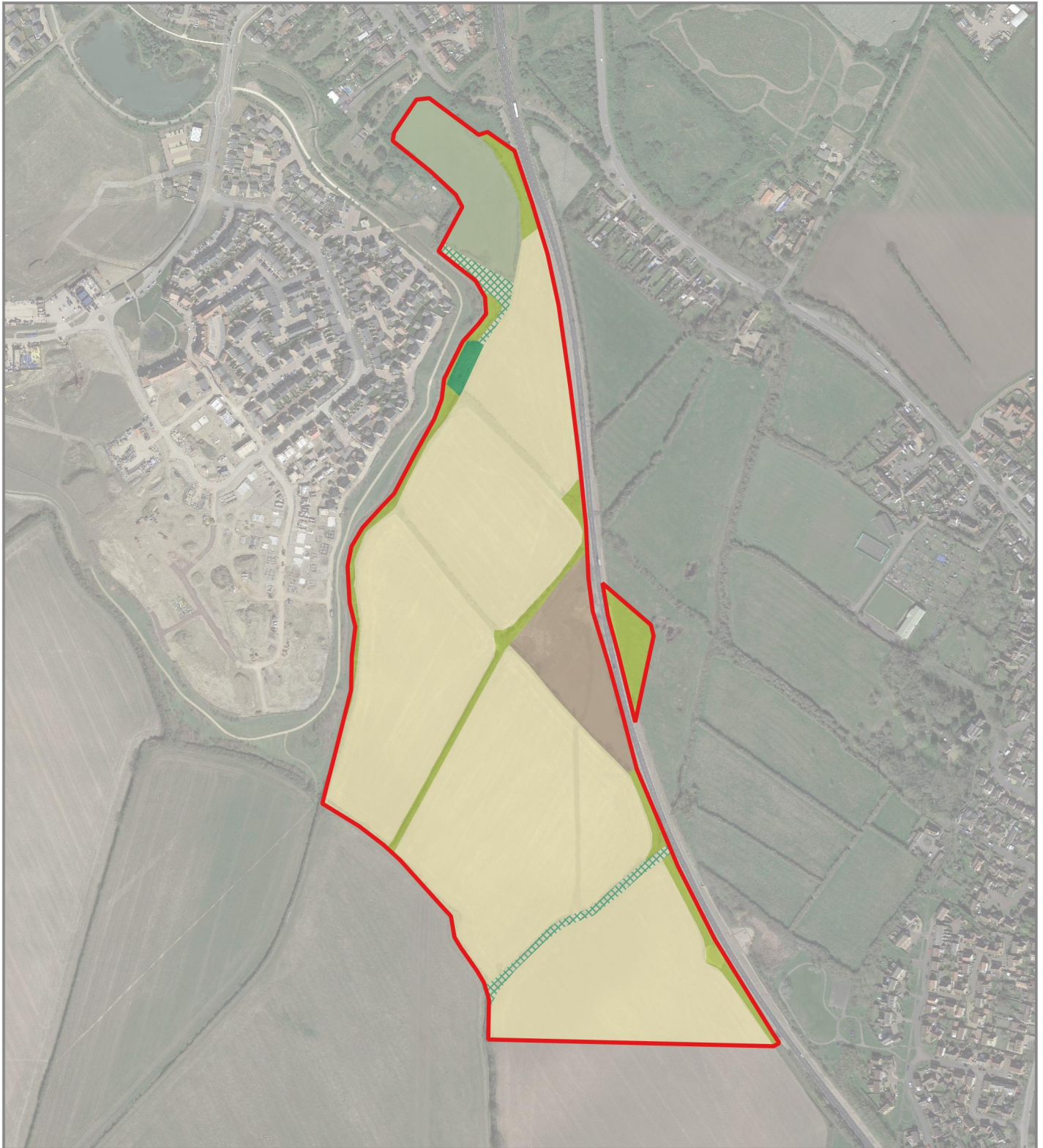
+ Development of the site will enable the achievement of a net gain in biodiversity

2d) Able to link into the green infrastructure opportunity network?

+ The site is within or adjoining the green infrastructure opportunity network and able to enhance the network

Plan 5820/BNG1:

Biodiversity Net Gain – Existing Habitats



Key:

-  Site Boundary
-  Arable (19.31ha)
-  Improved Grassland (1.46ha)
-  Semi-improved Grassland (1.87ha)
-  Bare Ground/Compound Area (1.43ha)
-  Dense Scrub (0.51ha)
-  Broadleaved Woodland (0.1ha)

aspect ecology

Aspect Ecology Limited - West Court - Hardwick Business Park
 Noral Way - Banbury - Oxfordshire - OX16 2AF
 01295 279721 - info@aspect.ecology.com - www.aspect.ecology.com

Land East of Wixams,
 Bedfordshire
 Biodiversity Net Gain -
 Existing Habitats

5820/BNG1

August 2021

PROJECT	
TITLE	
DRAWING NO.	
REV	-
DATE	










Plan 5820/BNG2:

Biodiversity Net Gain – Proposed Development



Key:

-  Site Boundary
-  Built Development and Gardens (11.22ha)
-  SUDS (2.04ha)
-  Woodland and Shrub Planting (4.82ha)
-  Grassland Creation (5.98ha)
-  Retained Dense Scrub (0.51ha)
-  Retained Broadleaved Woodland (0.1ha)

aspect ecology

Aspect Ecology Limited - West Court - Hardwick Business Park
 Noral Way - Banbury - Oxfordshire - OX16 2AF
 01295 279721 - info@aspect.ecology.com - www.aspect.ecology.com

Land East of Wixams,
 Bedfordshire

Biodiversity Net Gain -
 Proposed Development

5820/BNG2

August 2021

PROJECT	
TITLE	
DRAWING NO.	
REV	-
DATE	



Appendix 5820/1:

Biodiversity Metric 3.0 Results

Headline Results

[Return to results menu](#)

On-site baseline	<i>Habitat units</i>	54.32
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
On-site post-intervention (Including habitat retention, creation & enhancement)	<i>Habitat units</i>	71.68
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
On-site net % change (Including habitat retention, creation & enhancement)	<i>Habitat units</i>	31.96%
	<i>Hedgerow units</i>	0.00%
	<i>River units</i>	0.00%

Off-site baseline	<i>Habitat units</i>	0.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Off-site post-intervention (Including habitat retention, creation & enhancement)	<i>Habitat units</i>	0.00
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00

Total net unit change (including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	17.36
	<i>Hedgerow units</i>	0.00
	<i>River units</i>	0.00
Total on-site net % change plus off-site surplus (including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	31.96%
	<i>Hedgerow units</i>	0.00%
	<i>River units</i>	0.00%

Trading rules Satisfied?	Yes
--------------------------	-----

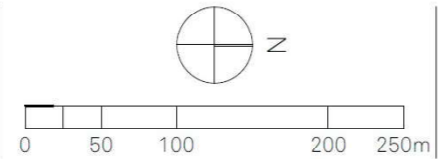
Appendix 5820/2:

Illustrative Site Layout



rev.	date	changes description
P03	8/11/2020	Amended to engineer comments
P02	8/11/2020	Amendments from consultant comments
P01	2/11/2020	

status	issued by
S1	RP
S1	
S0	



this drawing is the copyright of Re-Format LLP and may not be copied, altered or reproduced in any way or passed to a third party without written authority. All dimensions subject to site survey and site verification. Do not scale for construction ©

www.re-format.co.uk
 mail@re-format.co.uk
 +44 (0)1730 778778

drawn by
 RP
 checked by
 MS

date created
 Jan 2020
 scale at A3
 1:5000
 project title
 Land west of A6, Wixams
 document title
 Site Layout

project	originator	volume	level	type	role	number
F19146	RFT	01	XX	DR	A	0103
status	suitability description					revision
S1	Suitable for Co-ordination					P03



**Appendix 2: Orion Heritage, Bedford Borough Council Regulation 18 Draft Local Plan
Strategy Options and Draft Policies Heritage Technical Note (undated)**

Orion Heritage

Head Office, Citibase, 95 Ditchling Road, Brighton, BN1 4ST
+44 1273 573 803

Landmark, 3 Hardman Square
Spinningfields, Manchester, M3 3EB
+44 161 457 0291

County House, St Mary's Street, Worcester, WR1 1HB
www.orionheritage.co.uk



LAND WEST OF WIXAMS

Bedford Borough Council Regulation 18 Draft Local Plan Strategy Options and Draft Policies Heritage Technical Note

The Bedford Borough Council Sites Assessment for the Regulation 18 Draft Local Plan Strategy Options and Draft Policies call for sites. In relation to Land West of Wixams, the site assessment states the following:

“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.”

The site has been the subject of a historic environment desk-based assessment by Orion Heritage (March 2020). This was undertaken in accordance with the ClfA Standards & Guidance for Historic Environment Desk-Based Assessments (2017) and included a site survey to assess the potential survival of as yet unrecorded archaeological non-designated heritage assets as well as the potential effects on the significance of nearby designated heritage assets.

Built Heritage

This assessment established that there are no designated heritage assets within the site.

There are three designated heritage assets that could potentially be affected by the development of the site. These are The Vicarage Farmhouse (NHLE 1114196), The Parish Church of All Saints (NHLE 1321582) and The Little Church Farmhouse (NHLE 1114206). The assessment considered the potential effects of the proposed development of the site in the significance of these three assets. It concluded that while the site forms part of the wider rural landscape of these assets, the contribution that the site makes to the significance/experience of these assets is negligible to minor. The development of the site would consequently not harm the significance of the Vicarage Farmhouse, the Parish Church of All Saints and the Little Church Farmhouse.

The Bedford Borough Council Sites Assessment also mentions that there is the potential for listed buildings within the wider area, such as in Ducks End, to be impacted. The proposed development site is beyond the setting of these designated assets, as well two grade II buildings at Chapel End listed buildings. The Ducks End listed buildings are both relatively distant from the site and are also separated by the later houses of the built-up area of Ducks End. Consequently, the proposed development would not result in any adverse harmful effects to the significance of these designated heritage assets.



Archaeology

The assessment considered the archaeological potential of the proposed development site. It established that the site had the potential for the following non-designated archaeological remains:

- There are no prehistoric, Roman, Saxon or post-medieval archaeological remains recorded within site.
- The cropmarks of a possible medieval/post-medieval moated farmstead have been recorded in the north-east corner of the site. The eastern part of the proposed roundabout for the proposed development will occupy the western part of the field within which this feature is located. The construction of this roundabout will not impact upon these remains.
- Although there are no Iron Age or Roman remains recorded within the site, based on the results of previous archaeological investigations to the east, west and north of the site, it is considered that there is a moderate potential for Iron Age to Romano-British remains. Should such remains be present, they are considered unlikely to be of more than local significance and therefore, will not be a design or a planning constraint. However, it is possible that no such remains are present within the site. In accordance with Bedford Borough Local Plan 2030 policy 42S clause ii, a programme of archaeological evaluation comprising geophysical survey and evaluation trenching will be undertaken to support a future planning application. Should these investigations have positive results (i.e. reveal archaeological remains), the layout of the scheme could be designed to avoid impacting upon them should the significance of the remains merit preservation or a programme of archaeological excavation and recording can be agreed with the Borough Council in accordance with policy 42S clause vii where such remains are considered to not merit preservation.
- The site of a former WWII military camp has been recorded in the south of the site. This is within the extensive area of proposed open space and so should remains associated with this camp survive, they will not be impacted by the proposed development.

Conclusions

In light of the conclusions of the historic environment desk-based assessment, the proposed development of the site will not result in adverse impacts on the significance of designated built heritage assets. The two areas of the site where archaeological remains have been identified as surviving on site will not be impacted upon by the proposed development. The site has a theoretical potential to contain Iron Age and/or Roman non-designated archaeological remains. Should such remains be present, they are considered unlikely to be of more than local significance and therefore not be a design constraint. A programme of archaeological evaluation will be undertaken to inform the design of a future planning application and to inform the scope of any necessary archaeological mitigation works. Consequently, the potential impact on built heritage and archaeology is not a reason for the site to not be allocated for development.



Appendix 3: Lichfields, Economic and Wellbeing Benefits Assessment, ref 18690189v1

Wixam End, Bedford - Economic and Wellbeing Benefits Assessment

1.0 Summary

415 new homes, a country park and local play spaces – A scheme with benefits aligned with responding to the short and long-term local impacts of the Covid-19 pandemic.

Supporting the resilience of the local economy:

- **340** temporary construction jobs. **515** supported supply chain jobs.
 - Helping address rising unemployment → Out-of-work benefits claimants in Bedford Borough increased **106%** between March and June 2020 to 7,225 claimants.
 - Reducing local labour market contraction → **23,800** Bedford residents furloughed, 33% of local employee workforce.
- **£55.5m** capital investment into Bedford Borough. Generating **£64.4m** of economic output (GVA per annum).
 - Growing out of recession → UK GDP fell by **2.0%** in Q1 2020, with this forecast to be - **14%** by year-end; a notional **£592m** reduction in the economy of Bedford Borough.
- **£2.3m** first occupation expenditure “making a house a home”. **£13.1m** annual resident expenditure on shopping and services.
 - Helping the high street → National vacancy rates increased to 12.3% in March 2020.

Delivering a scheme aligned with community, health and wellbeing outcomes:

- **125** affordable homes, with **97** affordable rented.
 - Addressing acute needs → **181** homeless households as of 31st March 2020;
 - Generating savings → Preventing homelessness for 97 households is equivalent to a notional saving to the Council of **£569,000** in temporary accommodation spending.
- **71%** of homes (every house) with access to a private garden.
 - Quality of life improvements → equivalent to a monetary benefit to society of **£241,000** per year over homes having no access to a garden.
- **11.9ha** of formal and informal public open space on the doorstep.
 - Improving local access to open space → **378 metres** average distance to the nearest park, public garden or playing field in Bedford.
- **£9.15m** in CIL/s106 contributions improving local community facilities and infrastructure

Mitigating future Council fiscal impacts:

- **£2.8m** new homes bonus payment to Bedford Borough Council and **£758,000** annual receipt of council tax.
 - Providing income → **£4.75m** estimated shortfall in Bedford Borough Council’s budget because of the pandemic, with potential legacy effects beyond.

2.0 Supporting information

2.1 The following note sets out the approach, methodology and sources used in the above assessment.

Supporting the resilience of the local economy

Construction Jobs

2.2 The calculation of construction jobs is based on construction cost estimates and then uses the 'new housing' labour coefficient from the Homes and Communities Agency (HCA) Calculating Cost per Job Best Practice Note (2015)¹ assuming that 19.9 years of Full-Time Equivalent (FTE) employment would be generated per £1 million of construction cost in 2011 prices. The UK Government GDP Deflator (2019)² is used to deflate costs to 2011 prices. The construction phase is assumed as four years. Combined this provides an estimate of the number of direct FTE jobs created annually over the construction phase. As construction is made up of many discrete elements of work undertaken by specialists (e.g. bricklaying, carpentry, plumbing, electricians etc.), the number of workers on site will fluctuate during different periods of the construction phase.

2.3 Housing construction involves purchases from a range of suppliers who in turn purchase from their suppliers via the supply chain. The relationships between the initial direct spending and total economic impacts are known as the 'multiplier effect', which demonstrates that an initial investment can have much larger economic benefits as this expenditure is diffused through the economy. Research undertaken on behalf of the National Housing Federation indicates that the construction industry has an indirect and induced employment multiplier of 2.51³. Applying this employment multiplier to the direct FTE construction jobs indicates how many indirect and induced jobs could be supported per year of construction by the proposed development.

Unemployment and Labour Market

2.4 Statistics on out of work benefits are sourced from the Office for National Statistics (ONS) 'claimant count by sex and age' data for March and June 2020, which is available to Local Authority geography⁴.

2.5 Statistics on furlough are sourced from HMRC Coronavirus Job Retention Scheme statistics: July 2020 (published 15 July 2020)⁵. This provides figures to local authority level of furloughed employments (i.e. job contracts) by the residence of the employee. This has been compared with the resident employee workforce of the local authority area drawn from the ONS Annual Population Survey (Jan 2019-Dec 2019).

Economic Output

2.6 The construction phase of the proposed development will make a significant contribution by generating additional Gross Value Added (GVA). GVA is a measure of the difference between what is produced as an output (goods and services) and the inputs (raw materials, semi-finished products etc.) used in the production of the output. It represents the additional value that is

¹ Homes and Communities Agency (HCA), (2015); Calculating Cost per Job Practice Note

² UK Government, (2019); GDP Deflator

³ Indirect and Induced employment has been calculated by using an employment multiplier of 2.51 sourced from the National Housing Federation (2013). This implies that per direct job generated a further 1.51 induced jobs and supported in the supply chain.

⁴ Office for National Statistics (ONS), (2020); Claimant Count

⁵ HMRC, (2020); Coronavirus Job Retention Scheme statistics: June 2020

added through economic activity. This is based on 2019 Experian data⁶ on GVA within the construction sector. It should be noted that not all of this will be retained locally.

- 2.7 Forecast GDP fall of 14% across 2020 for the UK is drawn from the Bank of England ‘May 2020 Monetary Policy Report’. We have notionally applied this 14% drop to estimates of the local authority’s GVA for 2018 drawn from ONS ‘Regional GVA By Local Authority’ (Released December 2019).

Resident Expenditure

- 2.8 Research suggests that the average homeowner when moving into a new dwelling spends approximately £5,500 to make their house ‘feel like home’⁷. This money is generally spent on furnishing and decorating a property, which will generate a range of economics benefits including further indirect and induced jobs in local businesses.
- 2.9 The ONS Family Spending Survey 2018 (2019 edition) provides data on household spending by socio-economic classification and region⁸. This is combined with ONS data on ‘Analysis of Output Area Classifications’ which provides a neighbourhood level socio-economic classification group for the area of the development⁹. These are used to estimate total gross expenditure from the residents of the scheme, a proportion of which would likely be retained locally in shops and services. National high street vacancy data is drawn from the BRC-LDC Vacancy Monitor (March 2020) and is reflective of wider trends across the country which will be equally applicable at the local level.

Delivering a scheme aligned with community, health and wellbeing outcomes

Homelessness

- 2.10 A report presented to the Bedford Borough Council Housing Committee in June 2020 outlines 181 households were homeless and applying for social housing in the Borough as of 31st March 2020¹⁰.
- 2.11 Notional savings to the local authority from reductions in homelessness are based upon average spend per household housed in temporary accommodation for the local authority. This proxy is derived from returns on total annual temporary accommodation spending¹¹ for 2017/18 compared with MHCLG P1E Homelessness returns on the number of households being housed in temporary accommodation over that same period.

Private Gardens and Amenity Space

- 2.12 Analysis by the London School of Economics (Mourato et al, 2010)¹² showed that there is a positive health benefit from access to a private garden. This estimates that the use of one’s own garden weekly or more had physical, emotional wellbeing and health utility benefits to occupants. The research costed an annual benefit per person of between £171 and £575 per

⁶ Experian, (2019); Gross Value Added

⁷ Research carried out by OnePoll surveying around 2,000 UK adults in August 2014: <http://www.barratthomes.co.uk/the-buying-process/home-buying-advice/10-Year-Warranty-Terms-andConditions/>

⁸ ONS, (2019); ONS Family Spending Survey

⁹ ONS, (2011); Area Classification for Output Areas

¹⁰ <http://www.councillorsupport.bedford.gov.uk/documents/g5247/Public%20reports%20pack%2017th-Jun-2020%2018.30%20Housing%20Committee.pdf?T=10>

¹¹ <https://www.insidehousing.co.uk/insight/insight/the-cost-of-homelessness-council-spend-on-temporary-accommodation-revealed-57720>

¹² Susana Mourato, Giles Atkinson, Murray Collins, Steve Gibbons, George MacKerron and Guilherme Resende (2020), Economic Analysis of Cultural Services, LSE

annum based on converting a measure of people's quality of life into monetary terms (and to society rather than the individual) based primarily on health cost savings. Assuming 2.2 persons per household, this has been translated into a notional societal benefit from garden space, using a mid-point estimate (£373 per person per annum).

Access to Open Space

- 2.13 Data on local access to open space is obtained from ONS' statistics on 'Access to gardens and public green space in Great Britain (April 2020)'.¹³ This is based upon analysis using Ordnance Survey mapping and includes statistics by local authority.

Mitigating future Council fiscal impacts

New Homes Bonus

- 2.14 Under the UK Government's New Homes Bonus (NHB) scheme, Local Planning Authorities benefit from additional funding provided by the Government when new dwellings are delivered. Using standard methods of calculation, as contained within the Ministry of Housing, Communities and Local Government (MHCLG) NHB calculator¹⁴, and estimate of NHB payable is made. NHB payments are made over a set four-year period following delivery and will be split between lower-tier and upper-tier authorities.

Council Tax Payments

- 2.15 The proposed development would generate an increase in Council Tax receipts. This would provide an additional boost to the revenue base of the Council, over and above the impact of the NHB payments in the long-term. Drawing upon the assumptions and analysis related to NHB (and having regard to levels of Council Tax levied by the local authority in the current financial year), the per annum additional council tax payments that could be levied in perpetuity are identified.

Council finances

- 2.16 A report presented to the Bedford Borough Council Budget and Corporate Services Overview and Scrutiny Committee on 16th July 2020 forecast the gross impact of Covid-19 on the Council's finances would equate to £13.696 million up to the end of August 2020¹⁵. The UK Government has awarded the Council £8.946 million of non-ringfenced grant funding to help meet this deficit, leaving a funding gap of £4.75 million. The Council has received further grant funding from the Government; however, this funding is ringfenced for programmes such as track and trace and infection control and is not for general financial impacts (e.g. the purchase of computer equipment to enable home working).
- 2.17 Although these are short term impacts, it is inevitable they will continue to have long term impacts, including on Council financial reserves and future income if the economy is constrained and austerity policies are needed to be implemented.

¹³ Access to gardens and public green space in Great Britain, released 14 May 2020.

¹⁴ MHCLG, (2018); New Homes Bonus Calculator

¹⁵ <http://www.councillorsupport.bedford.gov.uk/documents/g5169/Public%20reports%20pack%2016th-Jul-2020%2018.30%20Budget%20and%20Corporate%20Services%20Overview%20and%20Scrutiny%20Commit.pdf?T=10>



Appendix 4: Response to Call for Sites Site Assessment Pro Forma and Transport Access Assessment, i-transport, dated 26 August 2021, ref: TW/JW/ITB15565-003b



Land South of Wixams, Bedford – Wixams End
Response to Call for Sites Site Assessment Pro
Forma and Transport Access Assessment

Client: Wates Developments

i-Transport Ref: TW/JW/ITB15565-003b

Date: 26 August 2021

Land South of Wixams, Bedford – Wixams End
Response to Call for Sites Site Assessment Pro
Forma and Transport Access Assessment

Client: Wates Developments

i-Transport Ref: TW/JW/ITB15565-003b

Date: 26 August 2021

i-Transport LLP

The Square
Basing View
Basingstoke
Hampshire
RG21 4EB

Tel: 01256 637940

www.i-transport.co.uk

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of i-Transport LLP

Quality Management

Report No.	Comments	Date	Author	Authorised
ITB15565-003	First Draft	18/08/2021	JW	-
ITB15565-003a	Client Draft	20/08/2021	JW/TW	TW
ITB15565-003b	Issue	26/08/2021	JW/TW	TW

File Ref: Y:\Projects\15000 Series\15565ITB Wixams Wates Developments\Admin\Report and Tech

Notes\ITB15565-003b - Response to Call for Sites .docx

Contents

SECTION 1	Introduction	1
SECTION 2	Vehicle Access Constraint	3
SECTION 3	Conflict with Traffic/Highway Capacity	5
SECTION 4	Public Transport Accessibility	7
SECTION 5	Pedestrian Access/Footway Connectivity	9
SECTION 6	Cycle Route Connectivity	12
SECTION 7	Summary and Conclusion	14

Figure

FIGURE 2	Pedestrian and Cycle Accessibility Plan
-----------------	--

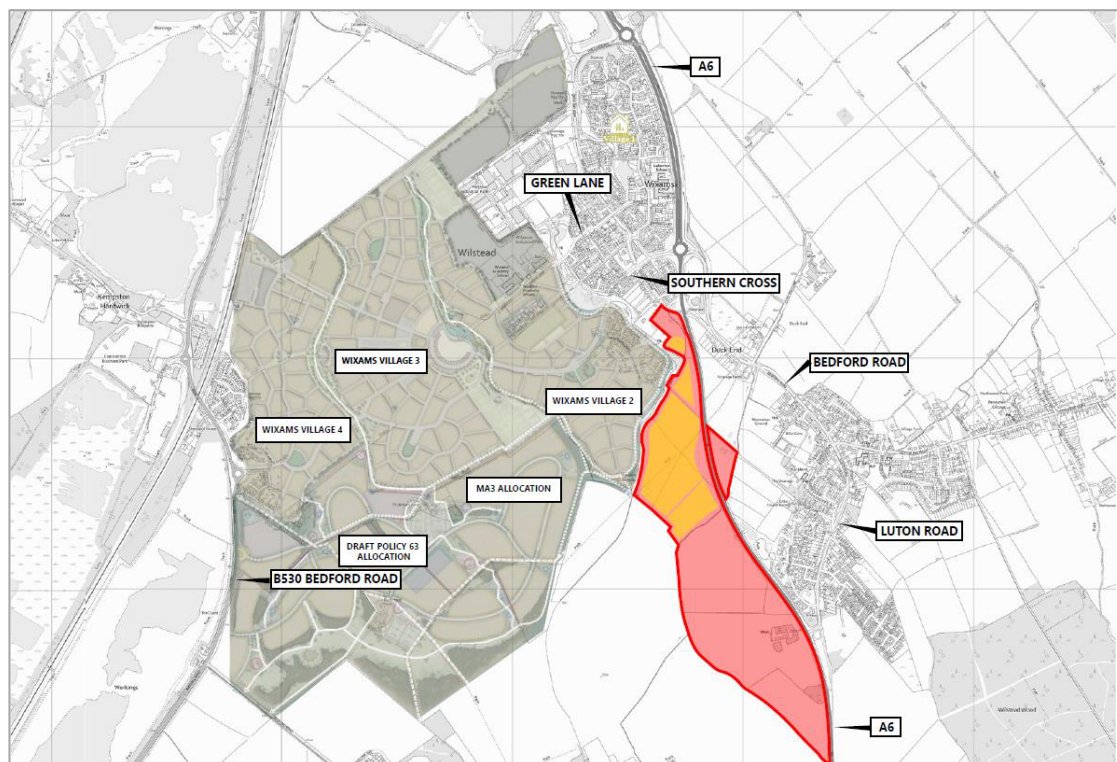
Drawings

ITB15565-GA-01	Proposed Site Access Arrangements
-----------------------	--

SECTION 1 Introduction

1.1 Wates Developments is promoting Land to the South of Wixams, Bedford (Wixams End), for residential development. The site can deliver around 415 dwellings as a sustainable extension to Wixams and is being promoted to the Bedford Borough Local Plan 2040. The site location, in the context of the wider existing / planned Wixams development is shown in **Image 1.1**.

Image 1.1: Site Location Plan



1.2 To support the promotion of the site, a Baseline Transport Appraisal was prepared and submitted in August 2020 which demonstrated that the site is deliverable in transport terms.

1.3 Bedford Borough Council (BBC) has carried out a review of all of the development sites proposed for consideration in its Local Plan and in transport terms has presented a scoring assessment of each site considered against five assessment criteria within its 'Transport Access Assessment':

- Vehicle access constraints
- Conflicts with traffic/highway capacity
- Public transport accessibility
- Pedestrian access/footway connectivity
- Cycle route connectivity

1.4 The summary scoring results for the Land South of Wixams Site are shown in **Image 1.2**, which overall rates the site as Amber (scoring 2.4 out of 5):

Image 1.2 – BBC Transport Pro-Forma Scoring – Land South of Wixams

Assessment Scores (each out of 5)					Maximum possible score (weighted)	Site assessment score (weighted average)	All mitigation feasible? (1=Yes, 0=No)	RAG Assessment Result
Vehicle access constraints	Conflicts with traffic/highway capacity	Public transport accessibility	Pedestrian access/footway connectivity	Cycle route connectivity				
25.0%	25.0%	20.0%	20.0%	10.0%				
3	3	3	1	1	5	2.4	1	Amber

1.5 The assessment has not considered various important considerations which affect the evaluation of the site and underscores the scheme against the assessment criteria.

1.6 This report sets out why the BBC ‘Transport Access Assessment’ scores do not reasonably reflect the transport aspects / deliverability of the proposed site. Additional information is presented alongside an alternative scoring assessment of the scheme, which concludes that the site should be considered as a deliverable site, and therefore attract a Green RAG rating.

SECTION 2 Vehicle Access Constraint

BBC 'Vehicle Access Constraint' Assessment Score: 3

- 2.1 The current assessment score for 'vehicle access constraint' is 3 out of 5, and the 'Transport Access Assessment' identifies that highway connection is 'uncertain', noting that the current access is unsuitable/requires improvement. Criteria 15e of the Site Assessment Pro-forma further considers access to be uncertain, stating "Potential access requiring mitigation".
- 2.2 The Baseline Transport Appraisal (August 2020) presented a feasibility design of the proposed site access arrangement, alongside a review of delivery constraints and operational performance, each demonstrating that access to the site can be satisfactorily achieved and is deliverable.
- 2.3 Access to the site would be delivered by the construction of a new 'normal' roundabout junction to the A6 on the immediate eastern boundary of the site. This is consistent with the various junctions that have recently been delivered on the A6 corridor to serve the wider Wixams community. The design conforms to all design standards (DMRB) and can be achieved either within land controlled by the promoters of the site, or the public highway.
- 2.4 **Image 2.1** presents the proposed access comprising of a new three arm roundabout to the A6 (Drawing **ITB15565-GA-001**) which has been designed in accordance with DMRB Standards.

Image 2.1: Proposed A6 Access Roundabout



Source: Drawing ITB15565-GA-001

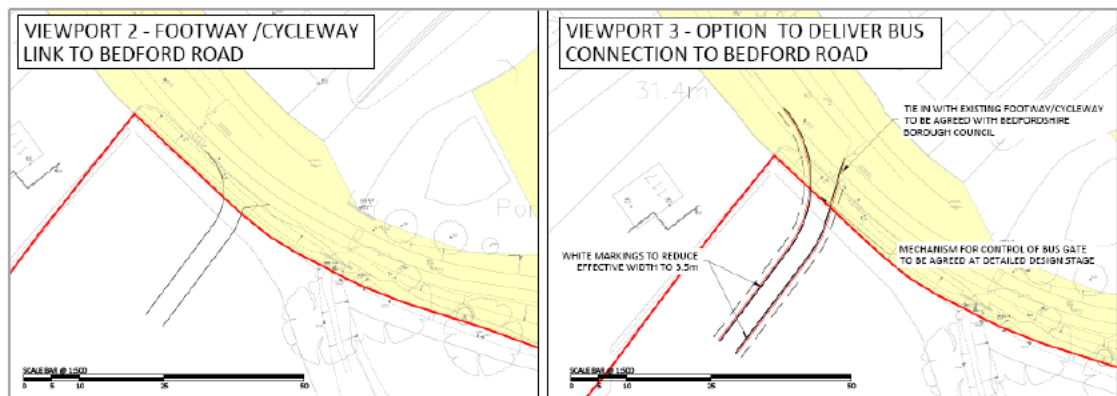
2.5 An appraisal of the future operation of the new roundabout was carried out using TRLs Junctions 9 software (repeated at **Table 2.1**) which demonstrates that the new junction would operate within capacity, with no material queuing or delay, and that the junction would operate under ‘Free Flow’ conditions (i.e. Level of Service ‘A’).

Table 2.1 – Operational Assessment – Proposed A6 Access – 2032 Future Year

Arm	AM Peak Hour				PM Peak Hour			
	RFC	Queue (veh)	Delay (s/veh)	LOS	RFC	Queue (veh)	Delay (s/veh)	LOS
A6 (North)	0.64	1.7	5.24	A	0.75	2.9	7.25	A
Site Access	0.75	2.9	7.81	A	0.69	2.1	6.31	A
A6 (South)	0.18	0.2	4.27	A	0.07	0.1	3.39	A

2.6 In addition to the new roundabout, a dedicated pedestrian and cycle and / or a ‘Bus Only’ connection has been considered on to Bedford Road, which would also double up as an emergency access to the scheme (**Image 2.2**). This will ensure that suitable access for all people, and all travel modes, can be secured as part of the development of the site and that it is within the control of the site promoters to deliver adequate access.

Image 2.2: Indicative Non-Motorised Connection to Bedford Road



2.7 The Site Assessment Pro-forma notes the proposed access strategy (i.e. a roundabout to the A6, emergency access to Bedford Road, and various pedestrian accesses). This further assessment has shown that access to the site is evidently achievable and deliverable, and that there should be no concerns or uncertainty about the potential to access the site.

Revised ‘Vehicle Access Constraint’ Assessment Score: 5 out of 5

SECTION 3 Conflict with Traffic/Highway Capacity

BBC 'Conflict with Traffic/Highway Capacity' Assessment Score: 3

- 3.1 BBC assess the site in relation to 'conflict with traffic/highway capacity' as a 3 out of 5. The Transport Access Assessment provides limited detail on how this assessment score is reached. The BBC Site Assessment Pro-forma at Criterion 15f states that "*potential capacity problem requiring mitigation*" and that "*more detailed review due to its scale and positive / negative impacts on surroundings*" is needed.
- 3.2 The Baseline Transport Appraisal submitted to BCC as part of the Call for Sites concludes that 40% of vehicle trips would be contained to Wixams and not travel outside of the town. Of traffic seeking to travel outside of Wixams, some 80% will seek to travel north towards Bedford and the A421, and 20% south towards Luton and other local destinations. This equates to around a 5% increase in traffic on the A6 to the north of Wixams and 1% to the south. These are not significant traffic flow changes and are unlikely to create material impacts on the wider network.
- 3.3 The Baseline Transport Appraisal also considers the potential traffic increases in the context of the assessed performance of local network junctions. The assessments demonstrated that local junctions on the A6 are likely to have sufficient capacity to accommodate development traffic.
- 3.4 It is identified that there are forecast capacity constraints at the A6 / A421 junction, but a mitigation scheme has been developed to improve operation of the network, and there are further opportunities to improve capacity if these are required. Development of Land South of Wixams can assist in bringing forward improvements (or mitigation) to the A6 corridor.
- 3.5 It is accepted that further, more detailed, assessments would need to be carried out as the proposals are developed and to consider the need for any further mitigation schemes. However, at this stage there is sufficient evidence available to conclude that there are no overriding highway capacity constraints to the delivery of the site.
- 3.6 In context, BBC has produced various traffic appraisals as part of its Local Plan Evidence Base (its consultants AECOM presenting various technical assessments). Whilst none consider specifically the impact of development of the Wixams End site, various spatial strategies are assessed which include further growth in Wixams. The assessments demonstrate that there are potential improvements available to address any significant impacts of the growth options, such that there should be no overall constraint to development in this area of the Borough.

- 3.7 Therefore, the BBC and Baseline Transport Assessments demonstrate that the potential impacts of the scheme on highway capacity are not likely to be significant, and moreover that any impacts are capable of being mitigated.
- 3.8 Despite this and recognising the additional work that would be required to confirm the details of any mitigation, the BBC scoring has been retained for the traffic capacity criteria.

Revised 'Conflict with Traffic/Highway Capacity' Assessment Score: 3

SECTION 4 Public Transport Accessibility

BBC 'Public Transport Accessibility' Assessment Score: 3

- 4.1 The current assessment score for 'public transport accessibility' is set at 3 out of 5. The Transport Access Assessment notes that there are bus stops less than 400m from the site. The Site Assessment Pro-forma suggests '*Stakeholder discussions with bus providers to provide new routes or extensions to serve the site*'.
- 4.2 The Baseline Transport Appraisal presents the existing bus service provision in the vicinity of the site including key destinations served and frequencies, which is reproduced in **Table 4.1**.

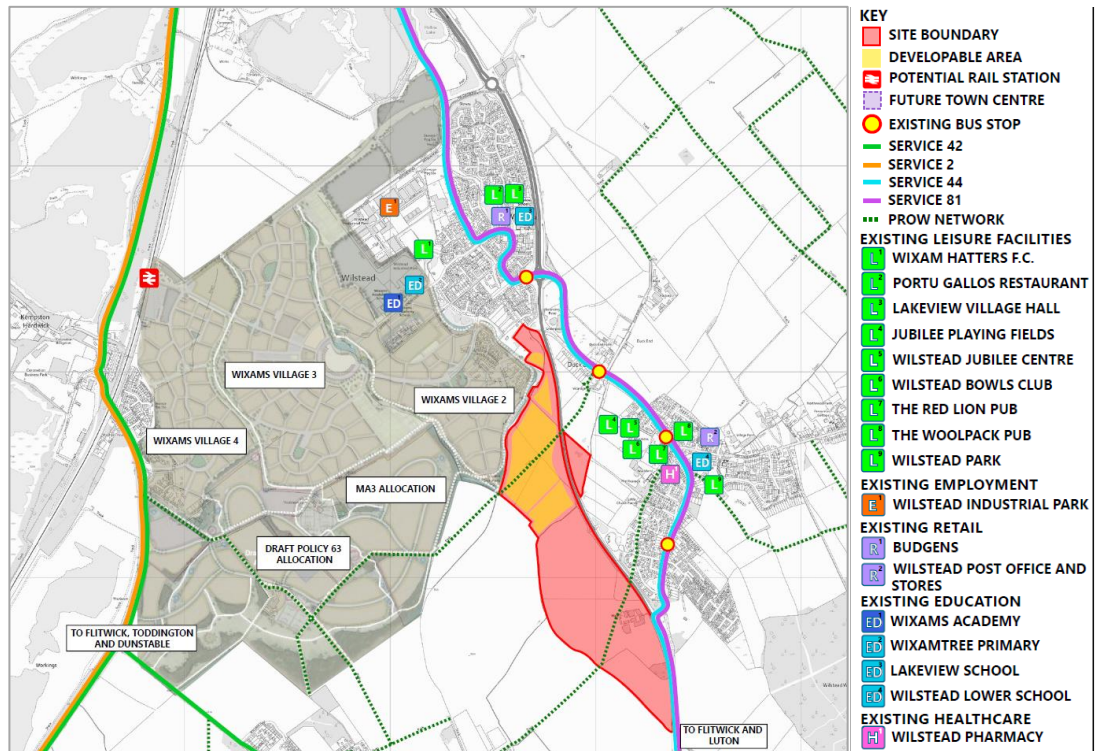
Table 4.1: Summary of Local Bus Services

Service	Route	Mon-Fri	Sat
44	Bedford – Clophill – Ampthill – Flitwick – Ampthill – Ampthill Heights	Hourly service	Hourly service
81	Bedford - Luton	Hourly service	Hourly service

Source: Traveline

- 4.3 The combined services offer half hourly services to Bedford, which is the key higher order settlement in the area, and connection to Luton, as well as other locally important destinations.
- 4.4 It is also noted that as part of the wider Wixams community several new bus routes are planned which will improve bus accessibility in the local area. The site offers the opportunity to develop bus service extension to integrate the site and to support existing and planned services. Measures to promote bus accessibility to the site will be developed as the site proposals emerge and there is good opportunity to deliver bus improvements as part of a comprehensive strategy for the continued development of Wixams. In line with the Site Assessment Pro-forma, the detail of any route extensions / new routes needed will be explored with bus operators and the Council.
- 4.5 The Baseline Transport Appraisal also identifies that Bedford St Johns is the closest railway station, located some 6.4km to the north of the site, with the railway station accessible by both bus service no. 44 and no. 81. Other rail opportunities are available at Flitwick, which can be reached via bus service no. 44. Connection to the rail network is therefore available and feasible.
- 4.6 As part of the new community at Wixams, a new railway station is being considered, although that is currently under review as part of the emerging proposals for the East-West rail project. If delivered, this would significantly enhance the accessibility of the area.
- 4.7 A public transport accessibility plan, identifying local facilities, was included in the Baseline Transport Appraisal and is reproduced in **Image 4.1**.

Image 4.1: Accessibility Plan



4.8 Overall, the site is well located to take advantage of existing and potential future public transport provision, which provides connections to key higher order settlements, as well as other locally important destinations. Engagement with BBC and bus operators offers a clear opportunity to enhance public transport connectivity in the future.

4.9 Despite this and recognising that further engagement is needed to determine the scope of improvements to services, the BCC scoring for the public transport criteria has been retained.

Revised 'Public Transport Accessibility' Assessment Score: 3

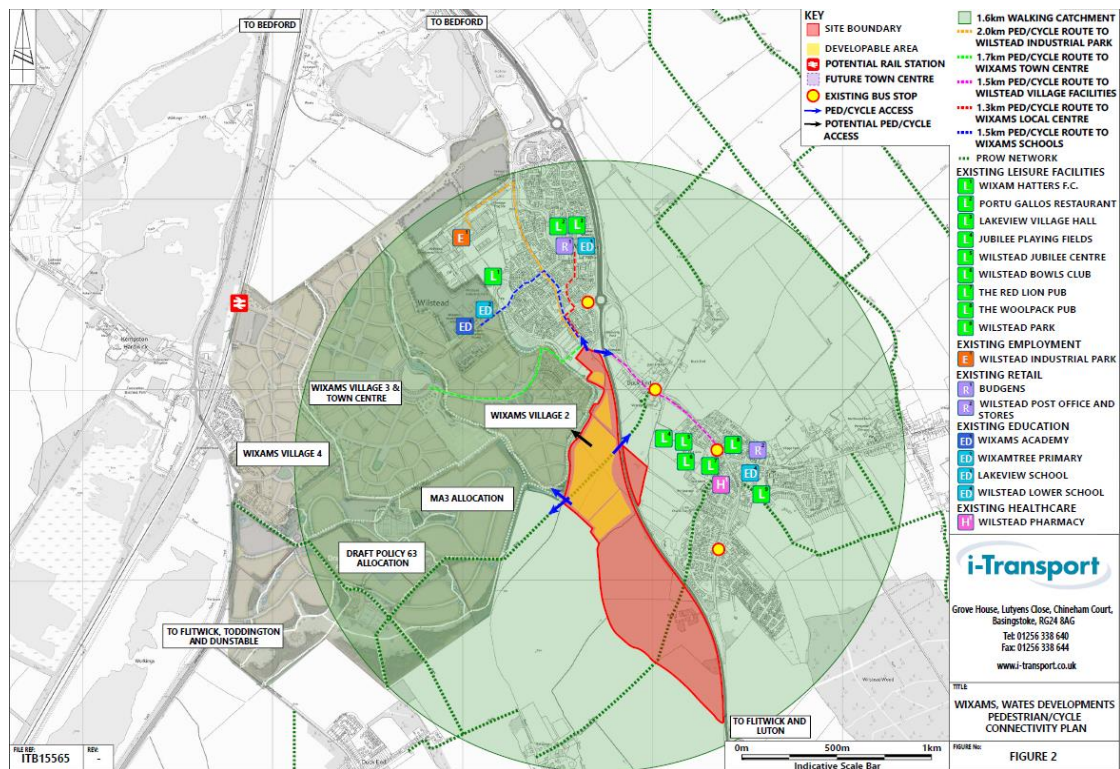
SECTION 5 Pedestrian Access/Footway Connectivity

BBC 'Pedestrian Access/Footway Connectivity' Assessment Score: 1

- 5.1 The current assessment score for 'pedestrian access/footway connectivity' is set at 1 out of 5. The BBC Transport Access Assessment notes that there are various pedestrian access points, and that '*accessibility was thoroughly described in the Transport Assessment*'. In addition, the Site Assessment Pro-forma states that '*the A6 would require investment in order to provide for improved pedestrian and/or cycle access*'. It is this later statement which appears to have resulted in an unrealistically low score being attributed to the site for this criterion.
- 5.2 The Baseline Transport Appraisal and Section 4 above sets out the accessibility of the site, which identifies that walking accounts for around 80% of all journeys up to one mile (1.6km), as well as over 30% of journeys up to two miles (3.2k) (NTS 2019). Within realistic walking distances of the site are the key facilities provided (and to be provided) at Wixams and in Wilstead, offering good opportunities for walking trips to be promoted as part of the scheme.
- 5.3 The site proposes to provide a new dedicated pedestrian/cycle access point to the north of the site to Bedford Road (**Image 2.2**). This access will provide connection to the existing footway network and access to Village 1 of the Wixams development and its associated local facilities, and beyond to wider Wixams and Wilstead. Drawing **ITB15565-GA-001** presents the indicative arrangement of this pedestrian access.
- 5.4 Village 1 includes a mixed use local centre, middle school, nursery, creche, village hall and sports facilities. The local centre provides a good range of everyday facilities, including food store, restaurant, primary school and village hall, within ~1km of the site, a 10-12 minute walk, making key facilities fully accessible by foot. A further primary school and secondary school have also been constructed to the west of Village 1, which are ~1.4km walk from the centre of the site.
- 5.5 The connection to Bedford Road will also provide a link to the existing footway to Wilstead village to the east of the A6. This includes a dedicated pedestrian / cycle underpass that travels eastwards under the A6 and a continuous footway provision, with street lighting, to the west of Bedford Road. Wilstead village includes a range of everyday facilities including pharmacy, post office, playing fields and primary school.
- 5.6 Potential pedestrian and cycle connections can be delivered from the western boundary of the site to Wixams Village 2, connecting to the green ring. This will help community connectivity and provide alternative routing for access to local services and facilities.

- 5.7 A further direct pedestrian connection is also proposed to the west of the site into Village 2 of the Wixams development from Footpath 3 of the existing Public Rights of Way (PRoW) network. Improvements will be made to Footpath 3 to ensure the site is well connected to the services and facilities. Village 2 will provide a local centre, which would be ~0.7-1.2km walk from the site.
- 5.8 Footpath 3 also provides a connection to between the site and Bedford Road to the east of the A6. Improvements to enhance the connection across the A6 can be considered as part of the scheme to enhance the attractiveness of the route to Wilstead village.
- 5.9 A pedestrian and cycle connectivity plan, identifying local facilities, is shown in **Image 5.1**. This includes the proposed pedestrian connection points, walking catchment and key walking routes.

Image 5.1: Pedestrian / Cycle Connectivity Plan



- 5.10 The lack of footways on the existing alignment of the A6 appear to have been given significant weight in forming the current low BBC scoring and site assessment.
- 5.11 Whilst it is noted that no footways are present on the A6 within the vicinity of the site, given the strategic nature of the A6 and the composition of traffic flows and speeds, provisions for pedestrians along the A6 are less desirable than the delivery of direct, traffic free and attractive connections to Bedford Road, Wilstead and Wixams which are proposed as part of the access strategy. As a result, it not considered necessary to improve pedestrian access directly from the A6 and this should not weigh against the site in the manner currently assessed.

5.12 The Transport Appraisal demonstrate that the site is well located to local facilities and services being delivered as part of Wixams and Wilstead Village. The site would form a natural, well integrated and cohesive extension to Wixams with good pedestrian connectivity.

Revised 'Pedestrian Access/Footway Connectivity' Assessment Score: 4

SECTION 6 Cycle Route Connectivity

BBC 'Cycle Route Connectivity' Assessment Score: 1

- 6.1 The current assessment score for 'cycle route connectivity' is set at 1 out of 5, with the Transport Access Assessment noting accessibility was thoroughly described in the Baseline Transport Appraisal. In addition, the Site Assessment Pro-forma noted that '*Wixams has a small cycle infrastructure network which could be expanded*' and that the '*A6 would require investment in order to provide for improved cycle access*'.
- 6.2 The emerging masterplan demonstrates a new dedicated pedestrian/cycle access point to the north of the site to Bedford Road. Drawing **ITB15565-GA-001** presents the indicative arrangement of this pedestrian access. This access will provide connection onto quieter alternative routes to the A6, through Village 1 of the Wixams development, which currently provides a number of local facilities, including a mixed use local centre, middle school, nursery, creche, village hall and sports facilities, and connecting to wider Wixams beyond.
- 6.3 The connection to Bedford Road will also provide a connection to existing cycle route to Wilstead village to the east of the A6. This includes a dedicated pedestrian / cycle underpass that travels eastwards under the A6. Wilstead village includes a range of everyday facilities including pharmacy, post office, playing fields and primary school.
- 6.4 These facilities within Village 1 of the Wixams development and Wilstead village are between 1.0-1.5km from the site. LTN 1/20 sets out the national Cycle Infrastructure Design and states that a distance of 5 miles (8.0km) is an achievable distance to cycle for most people, while NTS 2019 showed that the average cycle journeys is 3.3 miles (5.3km). It is therefore considered that Village 1 of the Wixams development and Wilstead village, are within a very comfortable cycle distance, with Bedford Road providing a quiet and safe cycle route.
- 6.5 Given the strategic nature of the A6, provisions for cycle facilities along the A6 are less desirable than the proposed routing through Village 1 of the Wixams development. As a result, it not considered necessary to improve cycle access directly from the A6, nor should this weigh against the delivery of the site when alternative and more suitable connections can be achieved.
- 6.6 The wider Wixams development will deliver further key facilities including:
- A new Town Centre (Village 3) – 1,850m (7 minute cycle)
 - Sports Facilities (Village 2 and 3) – 1,650m – 2,050m (6 minute cycle)
 - Strategic Employment Area – 2,350m (10 minute cycle)

- 6.7 The Baseline Transport Appraisal and further details set out above demonstrate that the site is well located to local facilities and services being delivered as part of Wixams and Wilstead Village, by quiet and safe routes. The site can deliver appropriate, attractive and direct cycle connectivity to the wider area and key destinations to ensure that the scheme offers good connectivity by cycling. Moreover, the scheme offers the opportunity to enhance cycle infrastructure, and to provide improved routes through the site.

Revised 'Cycle Route Connectivity' Assessment Score: 3

SECTION 7 Summary and Conclusion

- 7.1 This report provides a response to the BBC 'Call for Sites Site Assessment Pro-Forma' and 'Transport Access Assessment' of Land to the South of Wixams, Bedford (Wixams End) which is being promoted for residential development by Wates Developments. The site is expected to deliver around 415 dwellings as a sustainable extension to Wixams. The BBC assessments scores the site 2.4 out of 5 (weighted) and attributes an Amber RAG status to the scheme.
- 7.2 This report sets out the reasons why the current BBC assessment does not fully address the scheme proposals or opportunities for access and sustainable movement. The site is located in a well connected location, devoid of significant access constraints and can be intuitively integrated into the existing urban fabric of Wixams. The scheme offers a good opportunity to deliver sustainable development and a revised assessment of the scheme has been considered.
- 7.3 The current Transport Access Assessment scores, and the suggested revised scores are summarised in **Table 7.1**.

Table 7.1: Current and Suggested Assessment Scores

Criteria	Access	Highway Capacity	Public Transport	Pedestrian Connectivity	Cycle Route Connectivity	Total
<i>Weighting</i>	25%	25%	20%	20%	10%	
BBC Assessment	3	3	3	1	1	2.4
Revised Assessment	5	3	3	4	3	3.7

- 7.4 Considering the evidence and assessment presents a revised assessment score for the site is 3.7 out of 5, which would represent a change in the overall assessment, moving from Amber to Green in the RAG Assessment. This more reasonably reflects the scheme proposal and site opportunity and demonstrates that in transport terms, the scheme should be considered positively.

FIGURE