



Vision Statement



Duck End Lane
Wilstead
Kler Group Ltd.

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Prepared by:
Michael Robson



Introduction

1.1 Executive Summary

Cerda Planning has been engaged by Kler Group Ltd. to promote land at Duck End Lane, Wilstead, for residential development through the forthcoming review of the Bedford Local Plan 2030.

Kler Group Ltd. have a legally binding interest in the site, and the purpose of the agreement in place is to bring forward residential development. Kler Group Ltd.'s objectives are, therefore, to bring forward development and assist in meeting housing need requirements in the forthcoming plan period.

The site is in single ownership.

Although the Bedford Local Plan 2030 was adopted as recently as January 2020, as will be set out later in this document, there is a requirement to review the plan immediately. The consequence of the review is a new, extended plan period, potentially to 2038 or possibly beyond, and the need to include provision for the standardised housing methodology as opposed to a locally derived housing requirement as set out in the current plan.

Both of these matters result, both individually and cumulatively, in a new increased housing target for the Borough over and above that contained within the current plan. The increased housing figure is unlikely to be achieved through current allocations in the Bedford Local Plan 2030 and ongoing windfall development. As a result, positive allocations of land will be required in the forthcoming plan review.

This promotional document sets out Kler Group Ltd.'s thoughts on how a review to the Bedford Local Plan 2030 might progress, the implications in terms of strategy, the evidence base underpinning the Bedford Local Plan 2030 which will need to be updated but provides a sound basis for early discussion on how the review might progress, and how the site at Duck End Lane might meaningfully contribute towards the Council's new housing need.

The promotional document is underpinned by a series of technical and environmental assessments setting out key issues in relation to the site and how those issues might be mitigated.

The promotional document is therefore submitted outside of any formal consultation process so as to assist the Council in considering the merits of allocating the site, as set out later in the document, could deliver in the order of 300 houses in the first phase of the new plan period.

Kler Group Ltd. would like the opportunity to engage on an ongoing basis with the Council in delivering thoughts for the plan review as part of the iterative and evolutionary plan making process.

1.2 Site Location

The site consists of three large agricultural fields extending to approximately 14 hectares located on the northwest edge of Wilstead. The site is bound to the north-west by a modern farming complex on Duck End Lane and to the south-west by the adjacent field and the rear gardens of residential development on Dines Close.

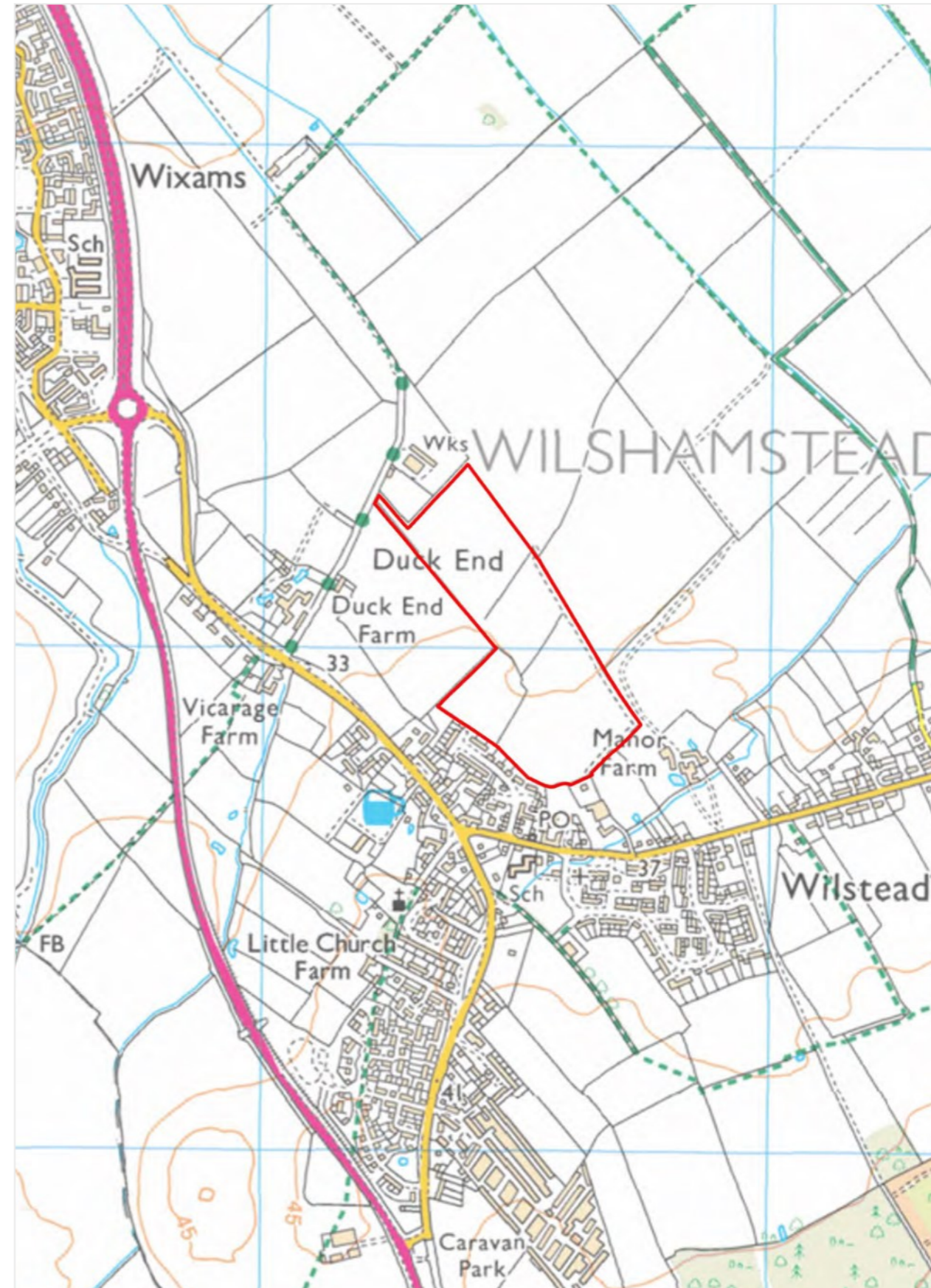
The majority of the site comprises fallow arable fields and a small section of rough grassland in the north-west of the site. Each field is separated by boundary hedgerows and a Veteran Oak tree. The site is bound to the north and east by arable land beyond which lies further farmland.

Access to the site would be from the Bedford Road via land which is also being promoted for residential development through the Local Plan Review and in the control of Kler Group Ltd.

Wilstead has developed in a linear pattern along Luton Road, Bedford Road and Cotton End Road although there are a number of examples of residential development extending to the south into previously open countryside.

Wilstead's commercial facilities are centred around the Luton Road, Bedford Road, Cotton End Road and Church Lane crossroads which are located approximately 280 metres south of the application site and are accessed directly via a footpath along Bedford Road. Wilstead is located approximately 7km south of Bedford Town Centre which benefits from facilities such as theatres, sports pitches, leisure centres and cinemas.

The Wixams a new town is located within a short distance to the north of the application site and will provide additional retail, community and education facilities locally.





Planning Policy Context

2.1 Emerging Local Plan

It is relevant to firstly consider the planning policy context for the current Bedford Local Plan 2030. To understand this, it is material to have in mind the provisions of the National Planning Policy Framework.

The NPPF was first published in 2012, revised in 2018 and further revised in 2019.

The NPPF reconfirms that provisions of PPG12 and PPS12 in relation to the plan led planning system in the UK. It also reinforces the requirement to meet housing requirements in full and sets out a presumption in favour of sustainable development.

Recognising the importance of plan making, and noting that many development plans were emerging at the point at which the NPPF was revised from the 2012 version to the 2018 and 2019 versions, the later revisions to the NPPF set out important transitional arrangements for the purposes of submitting and examining local plans. This set out a transitional date of January 2019 and, where plans were submitted before this date, they were to be examined under the provisions of the 2012 NPPF, and where plans were submitted beyond this date, they were to be examined under the provisions of the later revisions to the NPPF.

For Bedford Borough, the local plan was submitted in advance of the transitional arrangements cut-off date and, as such, was examined under the provisions of the 2012 NPPF. This has two important implications for the Bedford Local Plan 2030;

Firstly, the plan period did not need to run for 15 years from the date of adoption of the plan, and;

Secondly, the housing requirement could be set locally rather than applying the government's standard methodology.

Taking these matters in turn, it can be seen that the earlier iterations of the Bedford Local Plan 2030 proposed an end date of 2035, but was subsequently drawn back to 2030.

It is also to be noted that, although the standard methodology identified an annual requirement of 1281 houses at the time the Bedford Local Plan 2030 was being examined, the Inspector correctly applied a locally derived annual housing figure which was ultimately identified as being much lower at 970 dwellings per annum.

Since that time, the standard methodology for the Borough has increased to 1305 dwellings per annum.

The tension that arises is that the Bedford Local Plan 2030 was adopted after the revision to the NPPF were brought about with an extensive plan period of 10 years applicable to the Borough under the provisions of the 2012 NPPF.

In order to address that tension, consistent with other local plan examinations, it was determined that an immediate review to the Bedford Local Plan 2030 was required so as to bring it up to date in terms of plan period and housing requirement.

As a result, modifications were made to the Bedford Local Plan 2030 with the introduction of Policy 1 which sets out;

“The Council will undertake a review of the Bedford Local Plan 2030, which will commence no later than 1 year after the adoption of the plan and an updated or replacement plan will be submitted for examination no later than 3 years after the date of adoption of the plan in the event that this submission date is not adhered to, the policies in the Local Plan 2030 which are most important for determining planning applications for new dwellings will be deemed to be ‘out of date’ in accordance with paragraph 11d of the National Planning Policy Framework 2019.

The plan review will secure levels of growth that accord with government policy and any growth deals that have been agreed. The planning and delivery of strategic growth will be aligned with the delivery of planned infrastructure schemes including the A421 expressway, Black Cat junction, East West Rail link and potential the A1 realignment.

The review will also serve to build stronger working relationships with the joining and nearby authorities and may result in the preparation of a joint strategic plan based on a wider geography.”

In recognition of Policy 1, the Council has prepared a Local Development Scheme dated April 2020. This makes clear that “the Council will undertake a review of the Local Plan 2030, which will commence no later than one year after the adoption of the plan. An updated replacement plan will be submitted for examination no later than three years after the date of adoption of the plan...” The document advises that preparatory work is already underway and the new local plan will apply to the whole of the local authority area. It will review the development strategy, include new site allocations and review development management policies where required.

2.1 Emerging Local Plan

It is to be noted that the housing requirement in the review as required by Policy 1 is likely to be significant considered against the provisions of the Bedford Local Plan 2030. On the assumption of a base date of 2020 and an end date of 2040 (this being 15 years from the anticipated date of adoption) there is the potential to need to plan for a housing figure in the order of 26,000 dwellings without having to make an upward allowance for the increase in delivery of commercial development along the A421 corridor.

It is, of course, for the Council to establish the most appropriate strategy for delivery of these positive allocations of land which could include a joint strategic plan with neighbouring authorities. Whatever the options to be considered, it will not be the case that Bedford export all of its housing to neighbouring authorities. It is the case, therefore, that positive allocations of land will occur within the Borough's boundary, whatever the form of plan making going forward.

In terms of plan strategy, the Bedford Local Plan 2030 provides for housing on larger scale, standalone land whilst seeking to deliver smaller sites at sustainable settlements across the Borough.

This approach, which could be regarded as balanced dispersal, has the advantage of providing a degree of flexibility without over-reliance on one single or a small number of sites. This is advantageous given that any delays in the bringing forward of the single or smaller number of large sites will not have an immediate failure in terms of housing delivery.

The Council may elect to take a different approach to a plan strategy in the review to the Local Plan 2030. The later versions of the NPPF make great play as to the benefits that larger scale, stand-alone settlements, including Garden Communities, can make to plan delivery. There is, however, a growing trend as to the difficulties in bringing forward a plan with such sites, the most recent examples being Uttlesford whose plan has had to be withdrawn post-examination, and the North Essex authorities of Colchester, Braintree and Tendring where two of the three ambitious Garden Community sites are having to be withdrawn from the three Local Plans if they are to be taken forward to adoption.

It is also noteworthy that the Council will face challenges to housing delivery given the significant upscale in the annual requirement from the current locally derived 970 dwellings per annum to the standard methodology of 1,305 dwellings per annum. The need to deliver sites early in the new plan period so as to support housing land supply position is essential. Over-reliance upon larger scale sites with the inherent delays in delivery as a result of extensive offsite infrastructure and onsite preparatory works, as well as the reduced annual delivery per outlet with multiple outlets operating from a single site, must be borne in mind. It may also be said that, where sites are either cross-boundary or being delivered in a neighbouring local authority area, those houses are not meeting the housing land supply

for Bedford but, instead are to be attributed to a housing land supply calculation in the neighbouring authority area.

These matters all point to the benefits in advancing a plan strategy which has, to a greater or lesser degree, an element of balanced dispersal seeking to deliver additional housing on smaller sites at the sustainable settlements across the Borough.

The Bedford Local Plan 2030 identifies 16 settlements capable of supporting new development in the top 2 tiers of the settlement hierarchy comprising Key Service Centres and Rural Service Centres. Wilstead is ranked number 5 in this settlement hierarchy and yet no housing has been identified to be delivered at Wilstead in the current plan.

2.2 Neighbourhood Plan

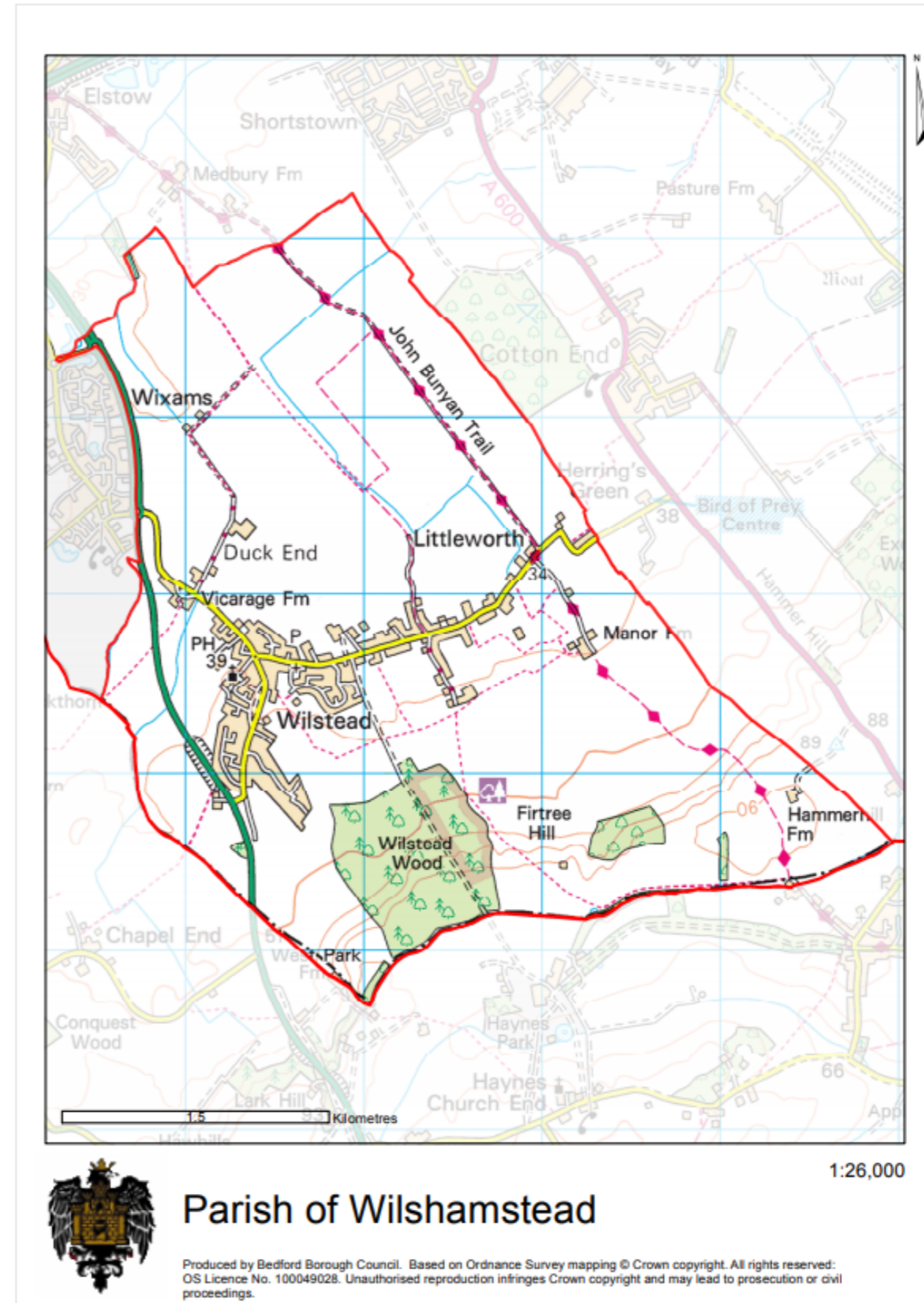
Wilshamstead Parish Council received its Neighbourhood Area Designation on 22nd February 2017. The area within the red line below contains the area to which the final Neighbourhood Plan will relate to once made.

The Wilstead Neighbourhood Plan website advises that the Plan is being prepared; that a steering Committee has been formed from interested villagers who will act on behalf of the Parish Council.

Once approved the Plan will:

- Sit within the framework of the Bedford Borough Local Plan
- Along with the Local Plan, be part of Central Government Housing Strategy
- Give the local community greater power to shape development
- Influence planning decisions within the Parish.

It appears that the Neighbourhood Plan has made slow progress and there have been no consultation events to date.



2.3 Site Assessment

Adopted Local Plan

Having examined the planning policy and the technical background in relation to the site in question, it is necessary to assess whether the site itself is suitable for allocation for new homes in the review of the Bedford Borough Local Plan.

Wilstead is a large village which lies close to the southern edge of the Borough Council's administrative area, and approximately 7km from Bedford town centre itself. The site in question lies on the north-western edge of the settlement and amounts to approximately 14 hectares.

Policy 3S – Spatial Strategy of the adopted Bedford Borough Local Plan 2030, has regard to delivering sustainable development and growth that enhances the vitality of the Borough's urban and rural communities, and all new development will be required to contribute towards the stated objectives and policies of the plan where, at part iv of the policy, it states that there will be 'strategic residential development in Key Service Centres in association with expanded education provision where necessary'.

Wilstead is one of 8 villages across the Borough that are named as Key Service Centres under Policy 4S of the adopted Local Plan which has regard to the Amount and Distribution of Housing Development. The Policy identifies that the Key Service Centres will see the provision of a total of 2,000 new homes, in the plan period, which is distributed equally between four named settlements (Bromham, Clapham, Great Barford and Sharnbrook), and to be delivered through Neighbourhood Development Plans. At present, the Parish Council is in the process of preparing its Neighbourhood Plan and it has not progressed to the extent where a draft has been published for public consultation.

However, it will be apparent that Wilstead is not amongst the list of the four Key Service Centres that is to receive such an allocation during this plan period even though, when the Borough Council produced its Rural Settlement Hierarchy in April 2017, the settlement of Wilstead (including Littleworth and Duck End) ranked within Group 1 and in fifth place of the six settlements within the Group.

Policy 7S has regard to Development in the Countryside and states that development outside of defined Settlement Policy Areas will be permitted if it is appropriate in the countryside in accordance with named policies. In addition, exceptionally development proposals will be supported on sites that are well-related to a defined SPA subject to meeting certain criteria.

From the various reports that have been prepared for the site and as considered in the various sections of this document, it is demonstrated that there are no over-riding technical, environmental issues or

concerns in relation to ground conditions, drainage, flooding or any impact upon noise and air quality or highways that, with appropriate mitigation measures, would diminish the future development potential of the site in question. The site in question is sustainable, available, and deliverable.



Constraints and Opportunities

3.1 Arboriculture

Aspect Arboriculture have provided a high-level appraisal of the Arboricultural constraints and opportunities at the site to support this promotional document.

Typical for the current agricultural land usage, the trees are set within the field boundary hedgerows forming small copses within unproductive areas between the cultivated fields.

In arboricultural terms, four remnant and hedgerow grown English Oak warrant particular consideration. Set offsite, ubiquitous ornamental plantings can be found within adjacent residential gardens, and where planted on the northern boundary to screen agricultural buildings.

Following BS5837:2012 guidance, three trees warrant category B, and one category A, all of which provide a valuable contribution to the amenity of the site, and its immediate surroundings. All remaining tree cover is of low arboricultural quality and warrants consideration as category C only.

Background checks reveal the absence of Tree Preservation Orders ('TPOs') confirmed within the site. The nearest TPO (no.1, 1995) applies to one Ash and one Evergreen Oak, set within the frontage to Duck End Farm c.250m to the west.

The principal tree within the site is an English Oak (former) pollard set within the central field . Veteran trees are defined by the National Planning Policy Framework as irreplaceable, wherein there is a presumption against development resulting in their loss or deterioration, without wholly exceptional reasons and a suitable compensation strategy. In accordance with current Forestry Commission and Natural England Standing Advice, the tree has been provided with a Veteran Tree Buffer ('VTB').

Owing to its position within an arable field, the tree has been subject to regular root disturbance through agricultural cultivation to all directions, which is a likely contributing factor to its retrenchment. Were the site to receive development, in accordance with standing advice, the Oak tree should be retained within an area of open space equivalent to or exceeding its VTB. The cessation of cultivation within its RPA, and its retention within an area of soft landscaping will facilitate the improvement of its rooting environment and resultant future outlook. Consequentially, the presence of the Oak does not affect the deliverability of the promotion site and subject to appropriate design, the tree would not be harmed should the site come forward.

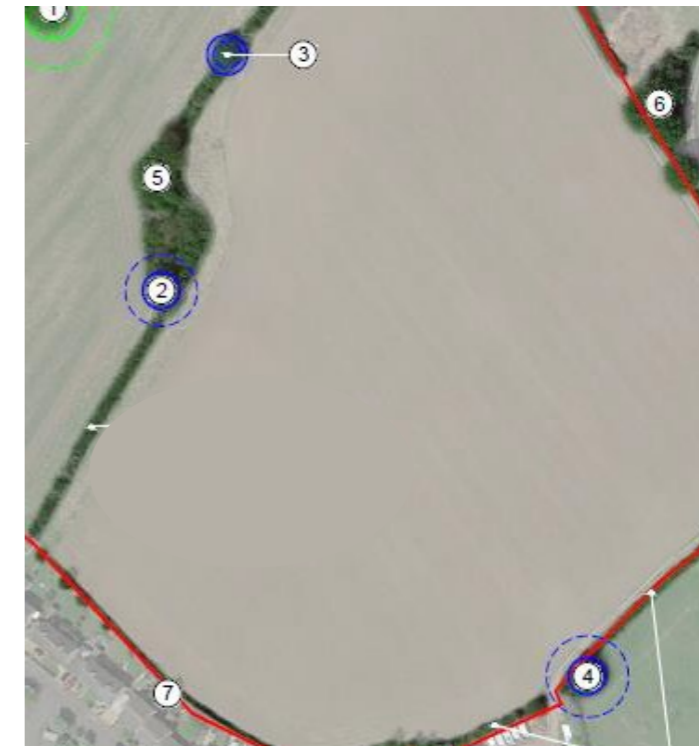
Three additional English Oak within influence of the site are considered to warrant consideration as category B components of the tree stock. Of these, those identified as T2 and T4 are mature, and T3 is early mature. The early mature Oak has developed a squat radially distributed canopy, and is capable of



Location of English Oak

providing a long term amenity contribution. The two mature examples are of a reduced physiological condition, exhibiting dieback and retrenchment within their canopies, but are not of a size to warrant consideration as veteran examples.

Locations of prominent trees



Two groups of trees immediately adjacent to the site warrant category B when considered on their collective merit and contribution. Both are offsite to the northeast: The eastern group is formed of five mature English Oak, which have developed as an intermittently cohesive feature; and the western

3.1 Arboriculture

collection is an early mature planted shelterbelt. Both are growing as groups such that they attract a higher collective rating than they would as individuals. Being situated offsite to the northeast, neither pose a significant constraint to development, whilst their retention can nevertheless provide a contribution to the site's amenity and transition with adjacent agricultural land.

It should be noted that, similar to the veteran Oak, all of the category B trees tree have been subjected to regular root disturbance through agricultural cultivation. Were the site to receive development, the trees would need be retained within (or abutting in the case of third party trees) an area of open space equivalent to or exceeding their Root Protection Area. The cessation of cultivation within these areas and their adoption for conditions more conducive to root development is a positive factor.

All remaining tree cover within the red line area is of limited arboricultural merit i.e. they and their amenity contribution are readily replaceable, and their removal is supportable where unavoidable. These trees are seen to as an opportunity to secure replacement trees of improved outlook, role and function.

The site's category C tree cover comprises three primary elements:

- Agricultural field boundary hedgerows surround and separate the arable fields; comprised of native and naturalised species. The hedgerows are in places intermittent, and whilst some sections are currently intensively managed, in other areas the former management has lapsed. The hedgerows' compatibility within a residential setting is subject to the continuation of management across its whole form, and will need to be a determining factor during design; the current and former intensive management regime, using a tractor mounted flail, precludes unmaintained large crown development in any event.
- Secondly, set internally within the hedgerow separating the southern two fields is an early mature collection of Field Maple, Ash, Norway Maple and English Oak, all are semi and early mature, which at their current age, are readily replaceable; in any event, it is improbable that these trees would pose constraints in their own right owing to their integration with the hedgerow as the primary feature.
- Lastly, buffering the site from the adjacent Duck End Farm, is an intermittent collection, set behind a boundary hedgerow. The collection is formed of Leyland Cypress, with occasional Ash, and four Hybrid Black Poplar, which provide the collection's maximum height. Whilst not significant in terms of their arboricultural quality, the trees do serve to screen and soften the adjacent farmyard and industrial buildings.

Local Plan Policy

Bedford Borough Council seeks to safeguard trees and hedgerows that make an important contribution to the site, both in terms of amenity and environmental value during the introduction of development. The relevant Policies are anticipated to be Policies 38, 39, and 40 within the recently adopted Bedford Borough Local Plan 2030. It is noted that the Council's adopted policies do not preclude the removal of trees or hedgerows, subject to justification for their removal and appropriate replacement planting. It is noted that material consideration will be given to the objectives of the Forest of Marston Vale, through Policy 36S of the Local Plan.

In effect this seeks to protect and enhance green infrastructure through the delivery of an uplift in canopy coverage. The extant field boundary network could readily form the framework for the introduction of new canopy in response this requirement, particularly since its future screening and transition role will increase in a residential setting. In any event it is foreseeable that canopy coverage would increase under development proposals.

Opportunities

It is anticipated that some low-quality tree and hedgerow loss will be inevitable to accommodate new development on the site. Subject to sensitive design, however, this is anticipated to major on short lengths of boundary hedgerow to provide access.

The probability of development necessitating the removal of moderate quality trees is low. Subject to arboricultural input during design, it is realistically likely that the risk to the existing trees can be managed in the trees' interest or even improved in their favour, i.e. through the cessation of agricultural cultivation within their RPAs.

The low number of trees within the fields, provides numerous opportunities for enhancing the extant treestock in terms of canopy coverage and distribution through the introduction of a scheme of soft landscaping. A well-designed development could provide both an increased quantum of large canopy bearing species within areas of public open space, alongside appropriate ornamental plantings within residential parcels where space is more constrained. This could complement and reinforce the site's few important trees.

A varied planting palette can provide gains in quality and resilience, whilst eventually providing succession planting to ensure the long-term presence of mature trees within the site.

3.1 Arboriculture

Preliminary Arboricultural appraisal plan



3.2 Ecology and Biodiversity

Aspect Ecology were instructed to provide a review of the possible landscape and visual matters relating to the site to inform this promotional document.

Ecological Designations	
Constraint	<i>Low</i>
Notes	<p>Statutory Designations</p> <p>The site itself is not subject to any statutory ecological designations. The nearest statutory designation is Kingswood and Glebe Meadows, Houghton Conquest Site of Special Scientific Interest (SSSI) and Local Nature Reserve (LNR) located approximately 3.5km south-west of the site. Kingswood and Glebe Meadows, Houghton Conquest SSSI and LNR includes an Ash/Maple woodland, characteristic of the heavy Oxford and Boulder Clays, which is a scarce habitat in Bedfordshire. The Glebe Meadows section comprises unimproved neutral grassland traditionally managed for hay. The next nearest statutory designation is Maulden Wood and Pennyfather's Hill SSSI located approximately 4.0km south of the site, which comprises a large area of mixed deciduous and coniferous woodland supporting a rich invertebrate assemblage.</p> <p>The site is located within the Impact Risk Zone (IRZ) for Kingswood and Glebe Meadows SSSI, Maulden Wood and Pennyfather's Hills SSSI and Southill Lake and Wood SSSI. The IRZs only apply to large infrastructure developments such as airports, helipads and other aviation proposals and industrial/agricultural developments that could cause pollution.</p> <p>Non-statutory Designations</p> <p>The site itself is not subject to any non-statutory ecological designations. The nearest non-statutory designation is Northwood Lane Meadows County Wildlife Site (CWS), located approximately 0.2km east of the site. Northwood Lane Meadows CWS comprises two neutral grassland fields mostly bound by hedgerows.</p> <p>The next nearest non-statutory designation is Hooked Lane Meadows CWS, located approximately 0.4km east of the site, which comprises a single neutral grassland field, usually horse grazed, with hedgerows present.</p>
Habitats	
Constraint	<i>Low-Moderate</i>
Notes	<p>The site is dominated by three fallow arable fields dominated by a low diversity of common and widespread invasive grasses and remnant cereals, which don't constitute an important ecological feature. A small area of species-poor long sward rough grassland comprising common and widespread grasses forms part of the field boundary at the north-west of the site. Nine hedgerows are present within the site, which are likely to qualify as a Priority Habitat and are of ecological value at the local level. Three hedgerows forming the southern boundary are species-rich, though none are likely to qualify as ecologically 'important' under the Hedgerows Regulations 1997 (as amended). A small wooded area of young trees is present in the centre of the site, which buffers a central hedgerow. A number of trees are present, largely associated with the hedgerows, ranging from young to mature in age. A veteran Oak tree is located within the arable field at the approximate centre of the site. Veteran trees are deemed as irreplaceable and are therefore important ecological features. The remaining habitat comprises strips of bare ground either side of a hedgerow in the east of the site, which are of negligible ecological value.</p>

Fauna	
Constraint	<i>Low-Moderate</i>
Notes	<p>Bats – A single mature Oak tree (T1), located just outside the southern boundary of the site was confirmed to be a bat roost in 2017 (day roost for a single Noctule). Tree T3, within the site, has moderate bat roosting potential, although surveys undertaken in 2017 confirmed the absence of a bat roost. A mature oak (T2) located at the eastern site boundary has a low potential to support roosting bats. In addition, the habitats within the site, e.g. hedgerows and woodland, are likely to be used by foraging and commuting bats.</p> <p>Badger – no Badger setts were recorded within the site although several background records were returned for the surrounding area. The habitats within the site provide a suitable foraging resource for local Badger. It is therefore possible that Badger utilise the site for commuting and foraging.</p> <p>Great Crested Newt – background records of Great Crested Newt (GCN) exist within 2km of and adjacent to the site. No breeding habitat is present within the site, although five ponds are located within 250m of the site. Pond (P5), which is located 198m to the west of the site was recorded as containing GCN during surveys undertaken by a 3rd party consultancy in 2015. GCN Habitat Suitability Assessments of ponds P1, P2, and P3, located to the south-east of the site found the ponds to be of poor suitability in 2017. Access to pond P4 for the purposes of a Habitat Suitability Index assessment was not gained and this pond is separated from the site by Bedford Road and residential housing. Suitable terrestrial habitat is present within the site for GCN in the form of hedgerows, rough grassland, brush piles and a wooded area. GCN may potentially utilise the terrestrial habitat within the site.</p> <p>Reptiles – Information returned from BRMC included records of common reptiles from within the local area, including a record of a Grass Snake adjacent to the site boundary. Reptile surveys undertaken in 2017 confirmed the presence of a single Common Lizard within a grass margin adjacent to a hedgerow at the east of the site, as well as a single Grass Snake within a grass margin adjacent to the garden curtilage of residential gardens to the west of the site. The number of recorded reptiles within the site in 2017 equates to a low population of Common Lizard and Grass Snake. The rough grassland at the north-west corner of the site provides suitable habitat for reptiles.</p> <p>Birds – Background records for several Priority Species and Red List bird species exist within 2km of the site including Black Redstart, Skylark, Osprey, Spotted Flycatcher, Marsh Tit, Song Thrush, House Sparrow, and Yellowhammer. The site offers foraging and nesting habitat for local birds but is not likely to be of significant ornithological value.</p>

Statutory and Non-Statutory Designations

Given the likely scale and nature of any proposed development within the site, and considering the physical separation involved, the statutory and non-statutory designations within the surrounding area are unlikely to be significantly affected.

3.2 Ecology and Biodiversity

Habitats

A large veteran Oak tree (T3) is present within the site. As per Natural England standing advice for ancient and veteran trees, a buffer at least 15 times the diameter of the tree or 5m from the edge of the tree's canopy, whichever is greater, is required between the veteran tree and the development area, unless otherwise advised by a suitably qualified arboriculturalist. The inclusion of a suitable buffer will mitigate against negative effects (e.g. dust deposition, pollution, and root damage) on the veteran tree during construction and minimise disturbance (e.g. light spill) to any associated nocturnal wildlife, such as bats, during the operational phase.

The woodland, hedgerows and mature trees within the site are of inherent ecological value and should be protected, retained and incorporated within the scheme design as far as practicable; alternatively, replacement habitat would be needed.

Bats

The background records from a previous site report returned records of two bat roosts for buildings associated with village farm, within 0.1km of the site boundary. An off-site adjacent mature Oak tree (T1), located adjacent to the southern site boundary was confirmed to be a bat roost in 2017. A mature Oak and veteran Oak tree are present within the site boundary, of which the mature Oak (T2) is of low and the veteran Oak (T3) is of moderate bat roosting suitability. The network of hedgerows, treelines and wooded area within the site provide habitat for foraging and commuting bats. Providing a future scheme design retains the suitable roosting and foraging features, and incorporates a sensitive lighting scheme, bats are unlikely to represent a significant constraint to the future development of the site.

Should trees with moderate potential for roosting bats be required to be removed / pruned to facilitate the proposals, these would require further survey effort in the form of dusk emergence / dawn re-entry surveys. Bat activity surveys (comprising manual walked activity and static detector monitoring), to establish the use of the site by foraging and commuting bats are recommended and can be undertaken between April and October, and typical survey effort would be a spring, summer and autumn survey as a minimum. Light-spill from any future lighting scheme onto retained and newly created habitat, in particular the retained hedgerows and associated mature / veteran trees should be minimised / avoided.

Badger

It is recommended that an update walkover of the site be conducted prior to development to confirm Badger setts remain absent from the site. If Badgers continue to be absent from the site then all that is likely to be required is the implementation of best practice safeguards during construction.

Great Crested Newt

The majority of the site provides suitable terrestrial habitat for amphibians, although no breeding habitat suitable for Great Crested Newt is present within the site. Of five ponds present within 250m of the site boundary, a single pond (located approximately 200m to the west of the site) was previously recorded as containing GCN during surveys undertaken by a third party consultancy in 2015. Three ponds located to the south-east of the site scored poorly for habitat quality based on Habitat Suitability Index assessments undertaken in 2017, and the fourth pond located to the south of the site was not granted access and therefore was not assessed.

It is recommended that an update Great Crested Newt survey / assessment of relevant ponds is undertaken (mid-March to mid-June) prior to a planning application submission in order to establish the current use of the off-site ponds by Great Crested Newts. The need for any GCN mitigation would be informed by the update survey work. Should the presence of Great Crested Newts be confirmed, then a licensed mitigation strategy may be required. Two licensing options are currently available, a standard site-based approach and the District Licensing approach.

Reptiles

Low populations of common reptiles including Common Lizard and Grass Snake were confirmed within the site during surveys undertaken in 2017. In accordance with best practice, it is recommended that an updated reptile presence / absence survey is carried out due to the presence of suitable reptile habitat throughout the site which is likely to be affected by the proposals. This would comprise seven survey visits undertaken between April and October (optimally in April, May and September) with July and August to be avoided.

The need for the implementation of a reptile mitigation strategy would be informed by further survey work. If required a mitigation strategy may take the form of an ecologically supervised habitat manipulation exercise or a trapping and translocation exercise, which would need to be undertaken during the active reptile season (between March and October inclusive). The proposals may need to provide on-site compensatory habitat as well as maintain reptile commuting links across the site although the current proposals present ample opportunities for this.

Birds

Development at the site has the potential to impact nesting birds should these be present at the time of site clearance. To avoid a potential offence under the relevant legislation, clearance of suitable vegetation (e.g. trees, hedgerows) should be undertaken outside the bird nesting season.

3.3 Landscape

Aspect Landscape Planning Ltd were instructed to provide a review of the possible landscape and visual matters relating to the site to inform this promotional document.

The technical note provides an overview of the baseline landscape and visual situation and potential landscape and visual effects which has informed the Landscape Opportunities and Constraints Plan.

The Site is located on the northern edge of the built up area of Wilstead and consists of agricultural land. Wilstead is situated approximately 7km to the south of Bedford on the main A6 road. The site is located between existing residential development associated with Wilstead and Duck End Lane to the south and north west respectively. The site comprises the entirety of two irregular shaped arable fields and the south western section of a larger field. The fields are defined, for the majority, by mature native hedgerows, with the exception of the north eastern site boundary. There are two sections of hedgerow crossing the site, which contain a number of mature hedgerow trees. Further to this there is a mature tree located within the central field, close to the western site boundary.

The mature vegetated boundaries and flat landform within the site, immediate and local setting affords a strong degree of physical and visual separation to the site. Further enclosure of the site is provided by the existing built form within the immediate setting of the site, which appears sporadic. There is a notable complex of agricultural buildings, that includes a MOT test centre adjacent to the north western site boundary, with further existing residential development along Duck End Lane within the immediate setting to the west. The south western boundary of the site is located adjacent to the existing settlement edge of Wilstead which is formed of residential development off Dines Close and Cawne Close, the combination of these features form an urbanising feature within the setting of the site. The landscape within the immediate setting and local area to the north east is a more open rural landscape of arable fields bound by mature hedgerow and hedgerow trees.

The wider village setting of Wilstead is located to the south of the site. The localised context to the north east, east, south west and north west of the site is made up of a number of arable and pastoral fields, bound by established hedgerows, mature tree belts and occasional small pockets of woodland.

Other than the two internal mature hedgerows with mature hedgerow trees, and the individual mature tree located centrally near the western boundary, the internal components of the site offer little in the way of landscape value. However the more established vegetation structure and mature hedgerows along the site boundaries provide a high degree of containment and visual separation from adjoining fields to the north east, east, south east, and the residential development along Duck End Lane.



Site and Settings Plan



Public Rights of Way

The site is not publicly accessible. There are however a number of public rights of way located within the vicinity of the site including the permissive right of way which runs along Duck End Lane to the north west of the site.

A network of footpaths and bridleways also run through the wider landscape to the north of the village. The John Bunyan Trail Long Distance Route (LDR) is located approximately 1.19km to the north east of the site.

3.3 Landscape

Local Gap

The site is located within an area identified as the Wilstead – Wixams 'Local Gap' and covered by policy AD42 Local Gaps within the Allocations and Designations Local Plan 2013.

The policy states:

"Areas which have particular importance as a local gap are identified on the Policies Map. Development will not be permitted in or adjoining a local gap which, because of the nature of the proposal:

- i. diminishes the gap physically or visually; or
- ii. changes its character adversely; or
- iii. compromises the integrity of the gap, either individually or cumulatively with other existing or proposed development; or
- iv. harms the character, setting or identity of any settlements separated by the gap

Proposers of development in or adjoining a local gap will be expected to demonstrate to the satisfaction of the local planning authority that their proposal does not conflict with the objectives of this policy."

The gap is described as "The gap between Wilstead and Wixams is less than 800m. In order to preserve the separate character and identity of Wilstead village, the gap between it and the planned Wixams new settlement requires additional protection from development to prevent coalescence."

Relevant landscape policy and development guidelines have been reviewed to inform the design development for the proposals. In addition, the site is not considered to contribute to the 'Local Gap' between Wilstead and Wixams.

The Visual Environment

The site is visually well contained within views from the north, west and south, due to intervening vegetation structures, prevailing topography and built form associated with the wider village setting of Wilstead and Duck End Lane, respectively. This substantially limits the visibility of the site to views from the immediate locality, namely residential properties off Dines Close and Cawne Close to the immediate south and partial views over the northern section of the site where there is no defined boundary from the permissive right of way to the north west. However, there are possible glimpsed long distance views from the wider elevated view along London Road (VP8) which takes in a panoramic view over the flat arable landscape to the south of Bedford. The retention and enhancement of the existing vegetative structure within and that which defines the site boundaries would maintain the verdant character to the site and its setting. This would provide a degree of separation between the proposals and the immediate and local views. In addition to this the existing built form consisting of residential development that

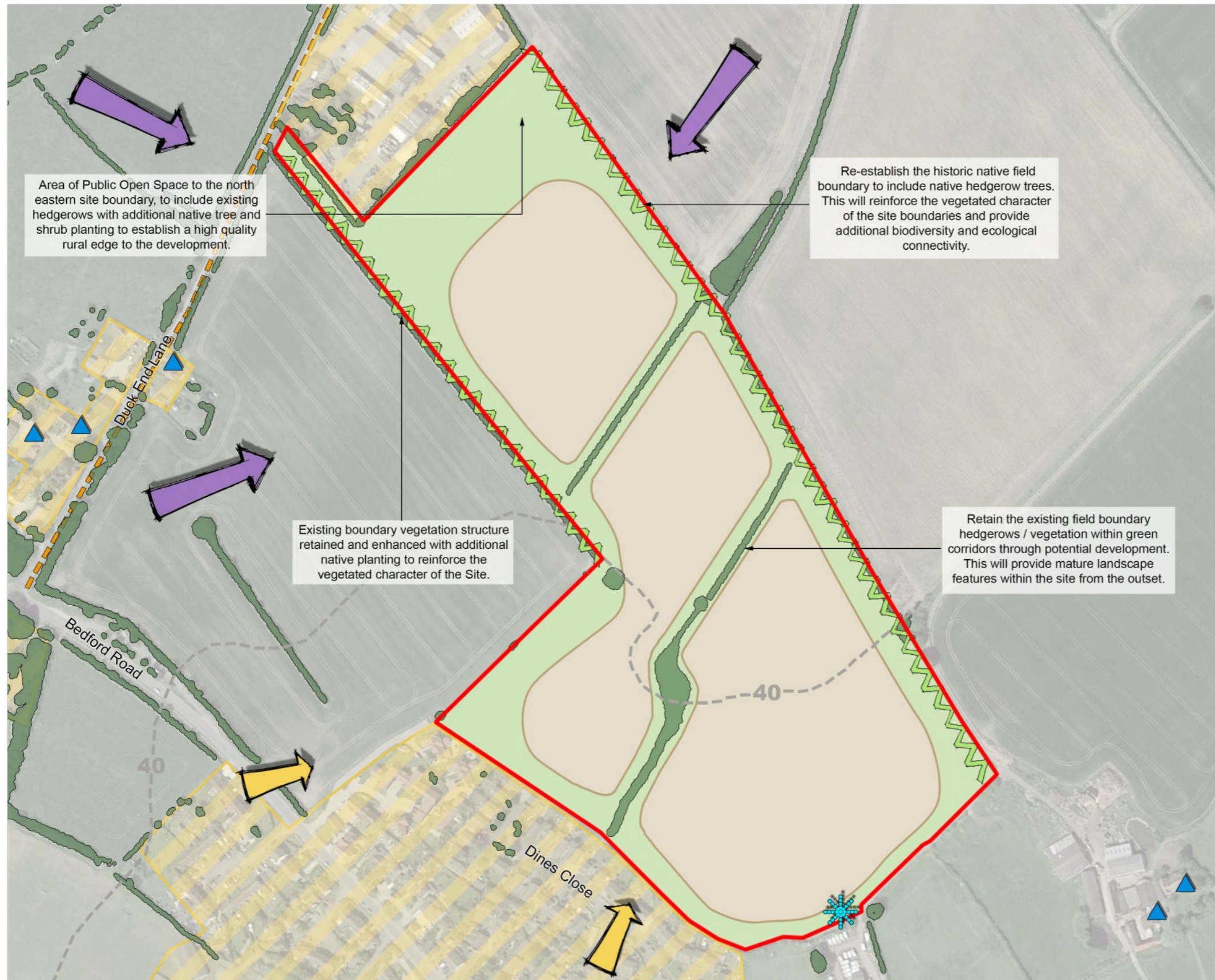
includes the notable complex of agricultural buildings along Duck End Lane and the mature vegetation along Bedford Road to the south west contain views of the site from the wider context in the north west and west.

Given the degree of screening provided to the site, the potential views of the proposed development would be highly localised and limited to rooftops due to the nature and scale of the existing mature boundary vegetation structure. Where there are immediate views the site is perceived alongside the existing residential built form that characterises the immediate setting and current settlement edge. Furthermore if development within the adjacent site to the south west was to be built out, this would substantially change the nature and character of the majority of these views.

Residential development on the site would not introduce any new or alien components to the views and as such would not adversely affect the character or amenities of the localised visual environment. The proposals seek to incorporate opportunities for a robust scheme of landscaping that would reinforce the existing landscaped setting, ensuring that the proposals can be integrated and with a notable area of public open space (POS) to the north eastern and north western boundary would provide a breathing space between the proposed development and the local and wider rural landscape to the north east and the existing complex of agricultural buildings off Duck End Lane.

Overall given the size of the site, it is visually well enclosed from the surrounding landscape and there are clear opportunities to reinforce the existing degree of enclosure.

3.3 Landscape



Landscape Opportunities and Constraints

- Key:
- Application Site Boundary
 - Public Rights of Way
 - Listed Buildings
 - Existing Contours
 - Local Views
 - Close Range Views
 - Potential Vehicular Access Point
 - Existing Development
 - Existing Key Vegetation
 - Reinforced Boundary Treatment

Area of Public Open Space to the north eastern site boundary, to include existing hedgerows with additional native tree and shrub planting to establish a high quality rural edge to the development.

Re-establish the historic native field boundary to include native hedgerow trees. This will reinforce the vegetated character of the site boundaries and provide additional biodiversity and ecological connectivity.

Existing boundary vegetation structure retained and enhanced with additional native planting to reinforce the vegetated character of the Site.

Retain the existing field boundary hedgerows / vegetation within green corridors through potential development. This will provide mature landscape features within the site from the outset.

3.3 Landscape

Opportunities and Constraints

The development of the site would adopt a high quality, landscape-led approach ensuring that the proposals can be integrated without significant adverse effects upon the receiving landscape character or visual environment.

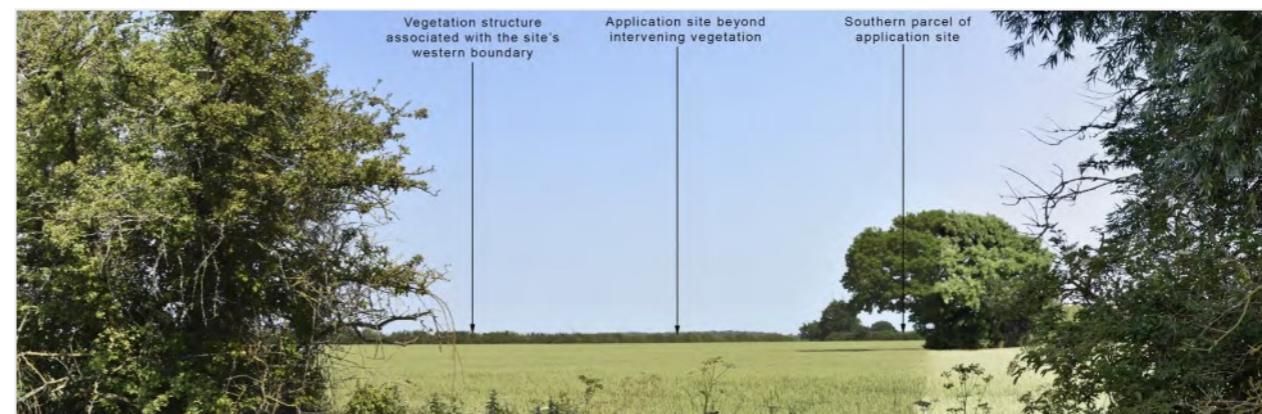
Any development within the site should incorporate the following elements:

- Creation of an enhanced and defensible edge to the north east and north west of the site and overall settlement to the north. The proposed landscape strategy would retain and enhance the site boundaries with the provision of notable area of POS, that reinforces the separation between the site and local and wider landscape setting to the north east and the residential development along Duck End Lane to the north west. The site boundary vegetation should be enhanced with further native hedgerow planting and scattered hedgerow trees which would create a more appropriate edge to the development and within the wider setting. The naturalised planting would also soften the perceived built edge and create an appropriate transition;
- An offset to the north western site boundary to be incorporated to ensure an appropriate buffer to the listed buildings within the immediate setting of the site is achieved. This would comprise a broad landscape buffer, which itself results in opportunities to establish native wildflower grassland, shrub and trees that combined provide habitat enhancements. These features not only contribute positively to the local biodiversity, but also provide seasonal visual interest for residents;
- The retained and enhanced boundary vegetation will reinforce the vegetated character of the settlement edge. Where vegetation removal is necessary to the site boundary to accommodate access, new planting would be established behind sight lines to ensure that the characteristic verdant streetscene is maintained;
- The proposals seek to achieve an “outward looking” development, with properties fronting onto the site boundaries, rather than turning their backs on the edges of the site and presenting a hard edge formed by rear garden boundaries. The outward facing properties create an active frontage to the proposed development and also provide passive surveillance to the areas of public open space within the development;
- Areas of public open space (POS), providing opportunities for play and informal recreation, should be incorporated as part of the development;
- Incidental open spaces, which includes the existing remnant hedgerows that cross the site, should run through the proposed development and would also assist in breaking up the perceived built environment and provide opportunities for feature planting that would contribute to placemaking;
- Sustainable drainage / attenuation features to be included within the POS, in the north western

part of the site. Not only is this a sustainable drainage solution, but opportunities exist to provide a mosaic of habitats to include native wetland planting around these features as part of the wider biodiversity enhancements across the site, that also forms part of the high quality landscape setting to the proposed development.

- Incorporate a simple palette of materials and architectural detailing that reflect the local vernacular.

The site has the capacity to accommodate a sensitively designed residential development which would not give rise to significant landscape or visual effects and is in line with adopted planning policy and the Bedford Borough Landscape Character Assessment. Proposed development would not be out of context and presents opportunities to improve access to the countryside and recreational facilities, enhance the local and wider landscape and improve biodiversity through habitat creation. In addition to this if development within the adjacent site to the south west was to be built out, this would substantially change the nature and character of the views and the proposals would be designed to reflect this change in setting.



3.4 Transport

ADC Infrastructure Ltd has examined transport and highways issues to demonstrate that the development of the site is appropriate and deliverable.

The adjacent land to the south has a planning history and was subject to an outline planning application (reference 17/00284) for up to 250 dwellings in 2017, with vehicle access proposed from Bedford Road at two access points which the Council refused in September 2017. Allocation of that site is also being pursued and the site the subject of this report would be accessed from and through that development site, effectively being a Phase 2 of a larger development. It is assumed that Phase 2 would accommodate an additional 250 dwellings, making 500 in total.

Existing highway environment

The development site is on the north-western edge of the village of Wilstead, northeast of Bedford Road and south-east of Duck End Lane and is used for agricultural purposes. Bedford Road is subject to a 30mph speed limit and there is an existing farm access at the southern end of the site on Bedford Road.



Access details

Duck End Lane is subject to the national speed limit connecting to Bedford Road at a priority-controlled T-junction. There is a footway on the southern side of Bedford Road which continues north-west and provides pedestrian access to the northbound bus stops, and connects with a footway/cycleway that continues under the A6 towards the 'new town' of Wixam. To the south-east, a footway continues into the centre of Wilstead. A layby acts as a waiting area/access to the existing recycling facilities.

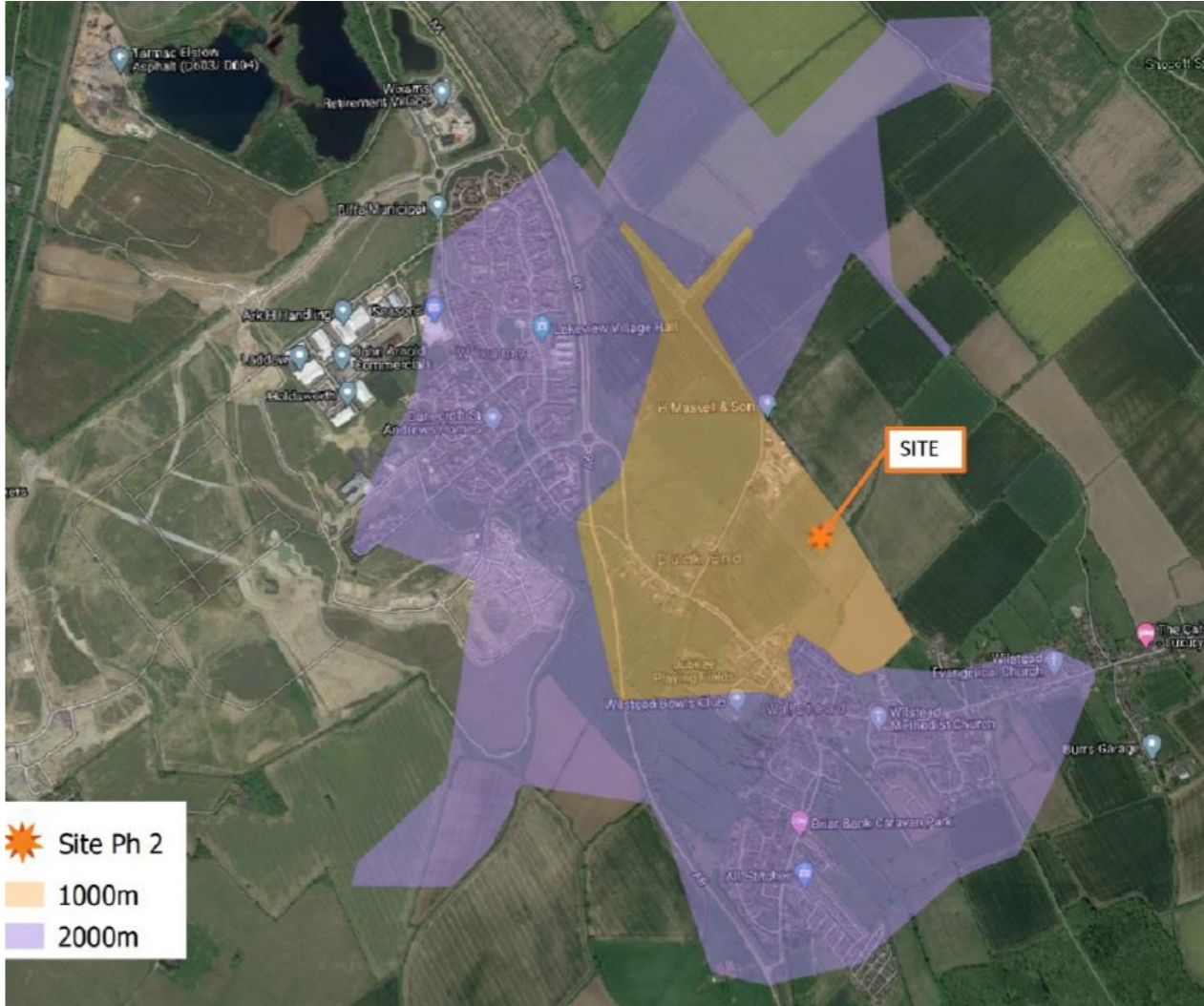
Access

The previous application in relation to the proposed development in phase 1 (land off Bedford Road) proposed that the development be accessed via two new simple T-junctions, which was accepted by the highways officer. The same access strategy would be appropriate for any new development proposal and the works are therefore replicated. Footways would be provided along the site frontage, connecting the two access junctions and extended east to connect with the existing footway adjacent to Cawne Close. The site access carriageway and internal road layout would be offered for adoption.

Sustainable Transport

Wilstead and its associated facilities are within 1km walking distance of the site and that includes Wilstead Lower school, Wilstead village centre, and all the village facilities. The amenities can be accessed via the footway on the southern side of Bedford Road.

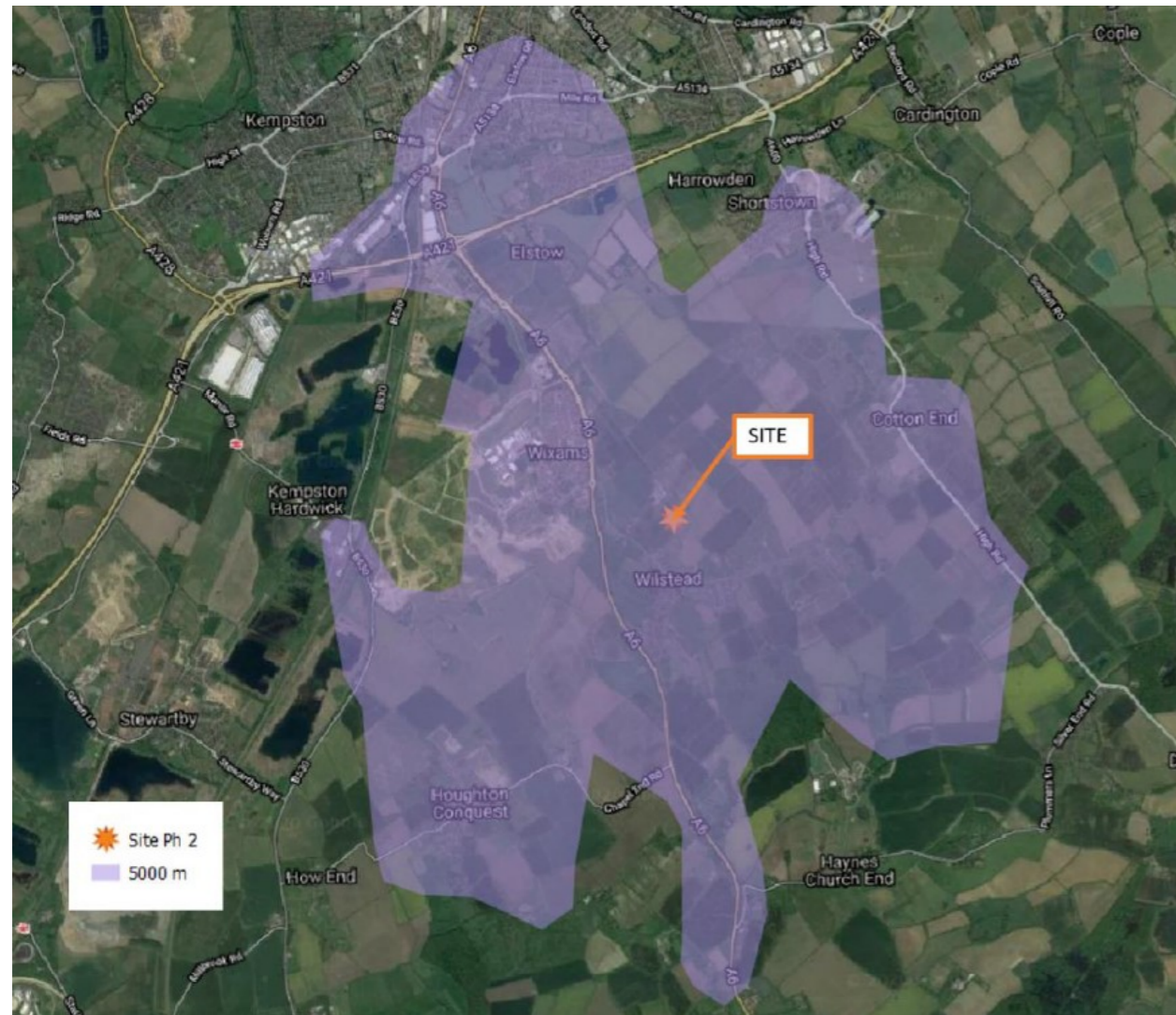
Walking distances from site



3.4 Transport

Wixam is a new town being built to the west of the A6. It consists of four villages, and the nearest one is Lakeview. Lakeview will provide various facilities such as a lower school, a supermarket, shops, a sports centre and play areas. They would be approximately 1.5km walking distance from the site.

There is a network of Public Rights of Way (PRoW) in and around the proposed development, providing pedestrian connectivity to Duck End Lane. Notably, Footpath 13 is located to the northwest of the site, and runs northbound from the end of Duck End Lane connecting with the network of footpaths and bridleways around Wilstead.



5000 metre walking distance from site

In response to concerns raised by officers during the consideration of phase 1, the site needs to connect with the existing pedestrian facilities within the village. It is proposed to extend the footway from the

eastern access eastwards to connect with the existing footway at the eastern edge of the Cawne Close, and complete the missing sections of footway further east. In this way there would be a continuous pedestrian route from the development into the village centre. The footways would be extended between the two access junctions on Bedford Road. They would also be extended west to the bus stop on the northern edge of Bedford Road.

From the National Travel Survey, the average length for a non-leisure cycle journey, such as those to school or work, is 3.5 miles (5.6km). The figure below shows the 5km cycle catchment from the centre of the site includes Wixam, Shortstown, as well as employment and leisure facilities in southern areas of Bedford and surrounding villages. Given the relatively low traffic volumes on the surrounding roads, cyclists can safely cycle on-carriageway.

The nearest bus stops that provide access to regular services are located on Bedford Road, to the west of the site. The northbound stop is approximately 470m from the centre of the Phase 2 site and is marked by a flag and pole, a shelter and layby arrangement with timetable information. The stop is accessible by using the southern footway along Bedford Road. The southbound bus stop is approximately 425m from the centre of the Phase 2 site and is marked with a flag and pole and a layby that forms the start of the layby/waiting area at the northwestern end. This stop is accessed by using the southern footway along Bedford Road and crossing to the northern side.

The bus stops serve the 81 and 44 bus services; the 81 service provides services through the day and during peak times. The 44 service routes from Bedford to Amphil via Wilstead and runs an hourly service throughout the day and during the peak times.

Traffic Impact (NOTE—this to be a sub heading please!)

The Transport Assessment for the previous application calculated that the proposed development of up to 250 dwellings would generate 211 two-way vehicle trips in a peak hour. The Transport Assessment forecast that these trips would divide at the site access on Bedford Road with the majority routing to and from the north to the A6 (north). The remainder would travel to and from the south, and at the Cotton End Road/Luton Road/Bedford Road/Church Road crossroads they would further divide between Cotton End Road (east) and Luton Road heading south to the A6.

The Transport Assessment for the Phase 1 application examined the site access junctions adopting a worst case that all the development traffic would use a single site access T-junction. In that worst case, the site access arm of the junction would operate at 31% capacity in the AM peak hour and 16% capacity in the PM peak hour.

3.5 Flood Risk and Drainage

ADC Infrastructure have examined flood risk and drainage issues to demonstrate that the development of the site is appropriate and deliverable and therefore entirely suitable for residential allocation.

The majority of the site lies within Flood Zone 1, which is classed as having a low probability of fluvial flooding, the exception being the north-west corner adjacent to Duck End Lane, and the existing farm buildings, which fall within Flood Zone 3, which are associated with an ordinary watercourse that runs parallel to Duck End Lane, being the lowest part of the site. Mapping shows that there are two areas of pluvial flood risk, one at the north-western site corner, and the other through the central portion of the site.



EA Flood Map for Planning extract, showing the fluvial flood risk to the site.

These are attributed to the minor watercourses that flows adjacent to the western boundary, and a second watercourse that runs north across the site from Dines Close in the south.



EA Flood Map for Planning extract, showing the pluvial (surface water) flood risk for the site.

The flood risks that may be posed to the site are summarised in the table below:

Flooding Source	Degree of Risk	Source of Risk
Fluvial	Low	Majority of the site is within Flood Zone 1, with the exception of the north-west site corner adjacent to Duck End Lane, which falls within Flood Zones 2 and 3. This is due to a minor IDB ordinary watercourse which runs adjacent to Duck End Lane.
Tidal	None	Site is not in a tidally influenced area.
Canals	None	There are no canals within the immediate vicinity of the site.
Groundwater	Low	Mapping accompanying the Bedford Borough PFRA shows that the site falls within an area deemed to have a low-moderate susceptibility to groundwater flooding. A review of the available British Geological Survey borehole records in the surrounding area showed that no groundwater was encountered. Residual risk to the site is deemed to be low.
Sewers	Low	Site is greenfield and is not served by an existing drainage network.
Pluvial (Surface Water) runoff	Low	EA Flood Mapping shows that there is a varying degree of risk across the site. Most of the site has a relatively low risk of surface water (pluvial) flooding. There are areas of medium and high risk associated with the IDB watercourse along the western boundary on Duck End Lane, and across the central portion of the site following an IDB managed drainage ditch that runs south to north, following the natural gradient of the land.
Reservoirs and Waterbodies	None	The EA mapping shows that the site does not fall within an area deemed to be at risk of reservoir flooding.

3.5 Flood Risk and Drainage

Mitigation

Mitigation measures to reduce surface water flood risk include:

- Maintenance of ordinary watercourses and observation of 9m stand off for development alongside the watercourse to allow continued maintenance;
- Drainage system design to include use of SuDs;
- Dry access and egress (through phase 1, Bedford Road for emergency vehicles – this route would fall outside of Flood Zones 2 and 3);
- Finished floor levels to be a minimum of 300mm above the general ground level of the site;
- External levels should be shaped to direct any exceedance flow from the system or external surfaces from building entrances, along highways, and into landscaped areas or drainage outlets.

Surface Water Strategy

The existing site is greenfield and comprises of a single agricultural field parcel. It is assumed that surface water either soaks into the ground or runs overland towards the existing land drainage network. The site is roughly split into two drainage catchments with the eastern half shedding towards the existing pond in the north-east and the western half towards the boundary in the west.

As infiltration does not appear to be a viable option in managing runoff from the development, then preference should be given to the disposal of surface water runoff into the nearest open watercourse or drainage ditch. There are watercourses adjacent to the western site boundary and crossing the central portion of the site from north to south which offer suitable locations to discharge runoff generated by the development, at an agreed discharge rate.

It is proposed to convey surface water runoff via a below ground, gravity conveyed surface water drainage network that will collect runoff from impermeable surfaces (roofs and highways) on-site and



drain to two detention basin features. These will be located in the site outside of the areas of Flood Zones 2 and 3, and towards the centre of the site, respectively. Runoff will then discharge into the two identified watercourses at two separate outfall locations subject to further agreement.

Foul Water Strategy

In accordance with Building Regulations Part H and best practice, foul water should look to be discharged according to the hierarchy below:

- A foul water sewer
- A combined sewer
- A septic tank
- A cesspool

The site is greenfield in nature and has no foul water discharge at present. Sewer asset record plans show that there are no adopted sewer assets within the site, with the closet sewers being segregated foul and surface water networks which serve Dines Close to the south-east, with a gravity foul sewer running west along Bedford Road to the south-west.

The closest potential connection point to the adopted sewer network is in Dines Close to the south-east which would involve crossing private land to make the connection. An alternative option for a gravity connection into the adopted network that would serve the Phase 1 development site to the south, subject to the completion of the development. It would be difficult to drain by gravity foul effluent from northern and north-west areas of the site, due to levels being below the adopted foul drainage network in Bedford Road, and so a pumped solution may be required. The development is deliverable in terms of flood risk and drainage. It would accord with the aims of the NPPF, and there is no reason to prevent the allocation of the development on the grounds of flood risk and drainage.



3.6 Heritage

RPS have produced a Constraints and Opportunities assessment of the site in order to support this promotion document.

Background

RPS provided heritage input into the refused application for the adjoining field (17/00284/MAO). Historic England had no comment on those proposals and the conservation officer considered that 'in terms of access and the principle of development on the site the proposal would result in less than substantial harm to the setting of a number of heritage assets and the degree will depend on these details'. As there was no built heritage reason for refusal of the scheme and not considered to be contrary to any local policies relating to built heritage, this suggests that the less than substantial harm to the identified built heritage assets from the development of this site was considered to be acceptable with regard to paragraph 196 of the NPPF. There were no archaeological grounds for refusal of the application on this site.

An outline application for the residential development of the land directly adjacent to the south-east of the site was also refused by Bedford Borough Council (18/00433/MAO). The second reason for refusal related to the loss of three non-designated heritage assets within this site and also the 'minor, less than substantial harm to the significance of the adjacent grade II listed buildings Manor Farmhouse and the Granary at Manor Farm'. Bedford Borough Council did not consider that the identified harm was outweighed by the public benefits and determined therefore that the proposal was contrary to paragraphs 196 and 197 of the NPPF and local policy relating to built heritage.

Designated Heritage Assets

The site does not contain any designated heritage assets. The closest Scheduled Monument is located c.3km to the west; Kempton Hardwick moated site. The Monument is screened from the study site by intervening built development and the local topography. The proposed development will not impact upon the heritage significance of any Scheduled Monuments. There are 20 Listed Buildings within the search areas. Of these, only 5 are intervisible with the site and are as follows:

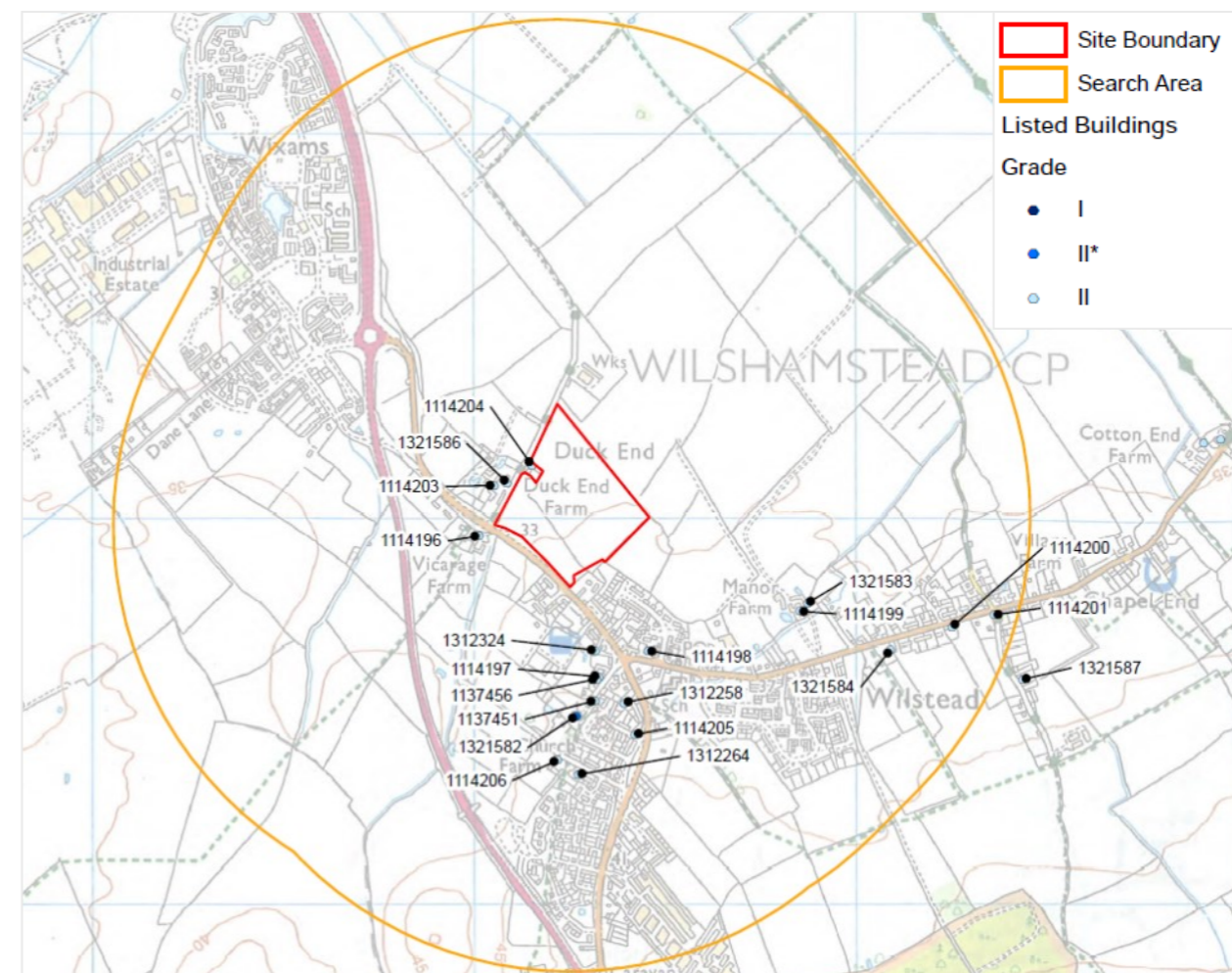
Three Grade II Listed Buildings on Duck End Road: Dove Cottage, Duck End Farmhouse and Barn at Duck End Farm which are located approximately 185m to the north-east. The site is separated from the Listed Buildings by the intervening field and hedgerows; however, the north-western part of the site is considered to form part of their wider rural surroundings and provides a low, positive contribution to their respective significance.

The development of the site will result in the loss of part of the wider agricultural setting of these three

Listed Buildings that provides a minor positive contribution to their significance. However, the intervening field and hedgerows will soften and filter the proposed built form and it is likely that only the upper parts of the buildings and roofs will be visible. The impact of the development could be further reduced through the incorporation of an open, undeveloped area along the north-western boundary of the site, the design and positioning of the houses and a sensitive landscaping scheme. The scheme will result in less than substantial harm to the significance of these Listed Buildings, although the impact would be reduced by virtue of its present low contribution and the adoption of mitigation measures.

Manor Farmhouse (Grade II) and the Granary at Manor Farm (Grade II) are located 140m to the south-east of the site. They are separated from the site by an intervening field and the modern farm buildings to the north-west of the farmhouse and granary. Whilst there is presently limited intervisibility between the site and the Listed Buildings, the site forms part of the wider agricultural surroundings of the Listed Buildings and positively contributes to the understanding of their historic development and function.

The development of the site will cause less than substantial harm to the significance of these Listed Buildings through the loss of part of their settings which provide a positive contribution. However, it is



3.6 Heritage

likely due to the distance between them and the extent of the existing vegetation that the built form will be only partially visible. Additionally, the retention of an undeveloped area along the south-eastern boundary would further minimise any visual impact, in conjunction with the sensitive design and positioning of the houses and an appropriate landscaping scheme. These measures will ensure that the impact of the proposed development on these Listed Buildings would be minimised as far as possible.

Non-Designated Heritage Assets

Geophysical surveys of the site was undertaken in November 2016 by Magnitude Surveys. The results identified no evidence of significant archaeological features across the site and confirmed the Medieval settlements of Duck End and Wilstead do not extend into the study site.

The Historic Environment Records contains:

- No Early Prehistoric, Iron Age/Roman Saxon or Post-Medieval/Modern activity within the site;
- Medieval activity is identified in the surrounding area- the deserted Medieval settlement of Duck End and ten small areas of former ridge and furrow. The site is located within the agricultural hinterland of the settlement and is therefore considered to have a low potential for significant remains relating to this period.

Located directly adjacent to the south-eastern boundary of the site is Village Farm; this complex of buildings is not recorded on the HER, but the Council identified them as a non-designated built heritage asset in the determination of the application for the site to the south-east (18/00433/MAO). Notwithstanding the loss of the farmhouse, the group of surviving farm buildings possess some limited significance and the wider agricultural surroundings positively contribute to their significance. Whilst located to the rear of Village Farm, intervisibility between them is limited by virtue of the intervening hedgerows and the modern buildings to the northern area of the farm. Additionally, the site only forms part of the wider undeveloped surroundings of the farm; the fields immediately to the east and west will not be affected by the development. The site therefore provides only a very limited contribution to the significance of Village Farm and the scale of any harm resulting from its development would be low.

Hedgerows

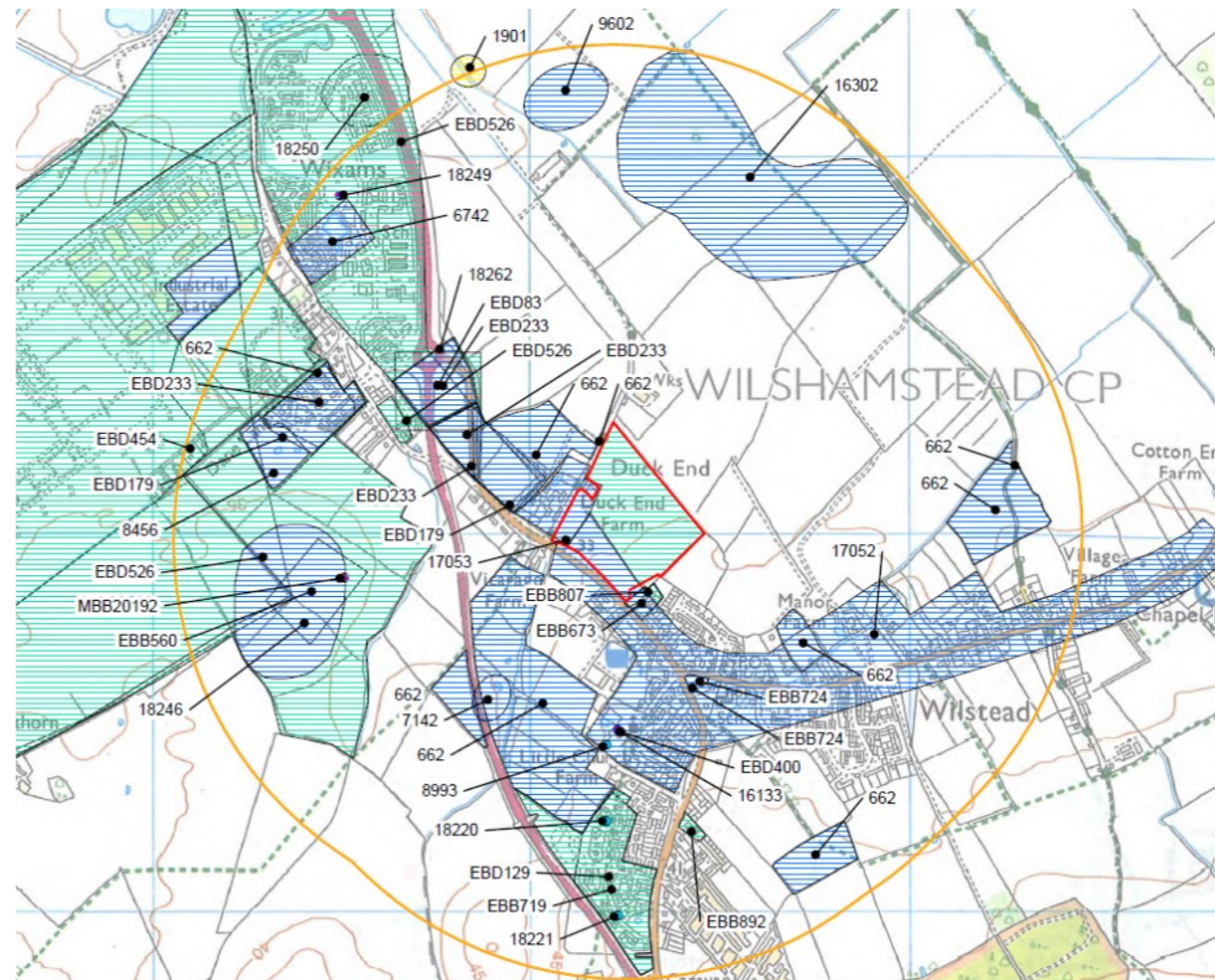
Part II of the Hedgerow Regulations (1997) contains eight criteria for importance, of which 1-5 relate to archaeology and history. Of these criterion 5(a) is relevant to the study site:

- Criterion 5: remnant of pre-inclosure field system
- Criterion 5 is that a hedgerow:
- (a) Is recorded in a document held in a record office as an integral part of a field system predating the Inclosure Acts;

Documents held by the Bedfordshire and Luton Archives and Records Service were consulted which included the 1809 Inclosure Map of Wilshampstead. The southwestern perimeter boundaries of the site, as well as small sections of the southern and north eastern boundaries, and the north-east to south-west aligned internal boundaries are shown as field boundaries on this map and therefore, fulfil Criterion 5(a) of the Hedgerows Regulations 1997 as they can be demonstrated to be part of a field system pre-dating the Inclosure Acts (Figure 4). These hedgerows are therefore regarded as 'important' in terms of the regulations and consideration should be given to their retention within the proposed development where possible.

Conclusion

This site is assessed as being suitable for allocation for residential development. RPS have undertaken an initial appraisal of the extent and nature of known heritage assets within the site and surrounding area, which has found no built heritage or archaeological constraints to development of the site that would need to be resolved in advance of the allocation of the site.



3.7 Noise and Air Quality

Air & Acoustic Consultants (AAC) have undertaken a Noise and Air Quality Feasibility study to inform this promotion document.

Noise Constraints

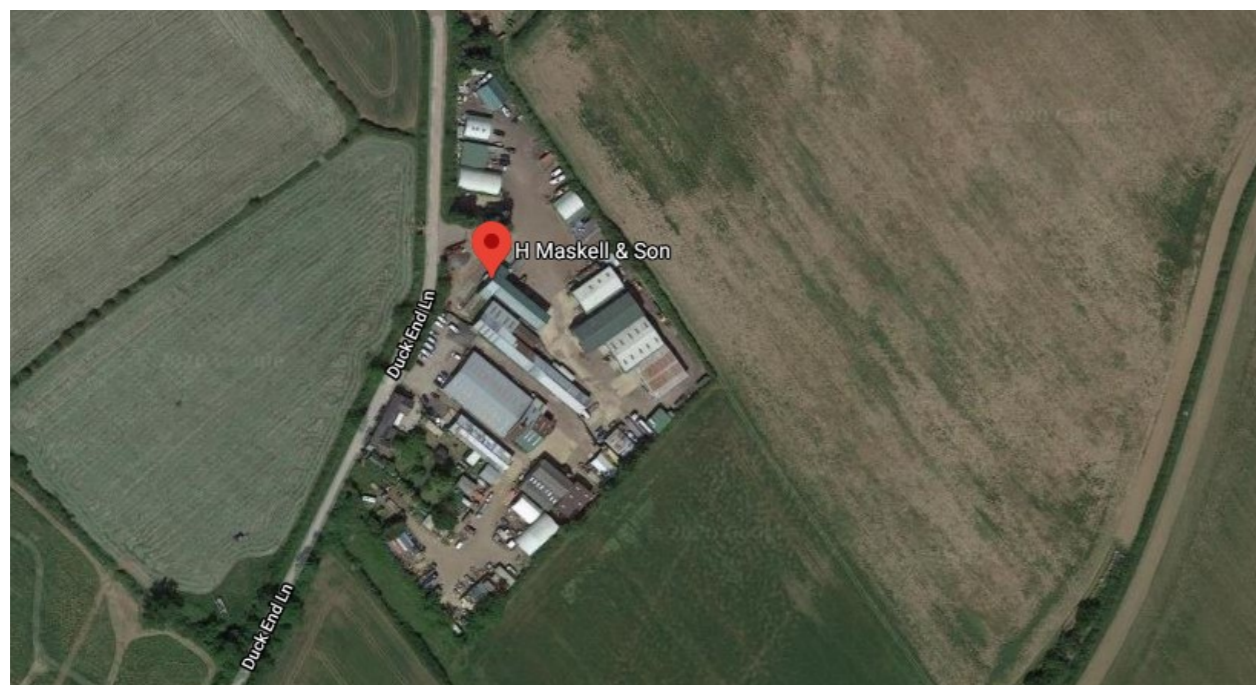
The potential noise constraints in terms of the existing and proposed noise sensitive receptors, will be the noise from traffic using the local highway network. A search of the area has identified that H Maskell and Son operate an industrial site just north of the site. They are an engineering company and manufacture boilers. Operations include plasma cutting, mobile welding and metal fabrication. Noise from these operations could have an adverse impact of the future receptors of the development.

Noise Assessment Approach

The future noise assessment will assess if a development is likely to give rise to any significant adverse impacts upon the existing or proposed noise sensitive receptors within the immediate surrounding area.

Mitigation

Various acoustic design options and mitigation measures for a future development can be considered during the initial site master planning, through building orientation, internal layout, setback, landscaping or barriers, glazing and ventilation. It is likely that if any façade treatment is required this will be for a limited number of units, located nearest to the main sources of noise. It is considered that the majority of a future development will benefit from screening providing by these structures and are therefore unlikely to need onerous façade mitigation.



Air Quality Constraints

Bedford Borough Council has one Air Quality Management Area (AQMA) and two automatic continuous air quality monitoring stations monitoring nitrogen dioxide (NO₂). A review of these sites indicates none of these are in close vicinity of the site, therefore, it is not considered that Bedford Borough Council are concerned about air quality concentrations in the area of the site. A search of the area has not identified any significant industrial or waste management sources that are likely to affect a future development, in terms of air quality.

The background concentrations are well below relevant air quality objectives. It is also likely that the pollutant concentrations at the site will be below the objectives and therefore the site would be suitable for a residential development in terms of air quality. The primary concerns will be any potential adverse impacts upon the immediate area. However, due to the size of the proposals, it is anticipated at this stage that any impacts would be negligible.



Mitigation

Through the undertaking of a dust risk assessment as part of the full detailed air quality assessment, a range of mitigation measures can be proposed, and built into a site-specific Construction Environmental Management Plan to include car clubs, contributions towards low emission vehicle refuelling infrastructure, provision of incentives for the uptake of low emission vehicles, financial support to low emission public transport options and improvements to walking and cycling infrastructure.

With the anticipated acceptable air quality concentrations in the locality of the site and the implementation of some of the mitigation measures above, it is anticipated that the impacts associated with the operational phase of proposed development can be mitigated to within an acceptable level.

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Framework Plan

4.0 Framework Plan

The Framework Plan prepared by Vista Architecture and Urban Design has been informed by a thorough understanding of the context within which the proposed development will sit. The constraints and opportunities provide a useful basis for the formulation of a design concept and are summarised below:

Constraints

- Amenity of residents of existing dwellings off Dines Close and Cawne Close along the southern boundary of the site;
- Veteran Tree within the south-west portion of the site;
- Hedgerows and trees around the edge of the site;
- Adjacent agricultural and commercial uses to the north western corner of the site.

Opportunities

- Access into the site through phase 1 of the development off Bedford Road (also in the control of the promoter);
- Proposals to be outward looking with properties fronting onto the linear public open space around retained hedgerows and public open space rim of the development site. The outward facing properties will create an attractive and active building frontage and provide passive surveillance to the areas of public open realm within the development and a suitable development interface with the wider landscape.
- No loss of privacy to occupiers of adjoining development by use of wide off-set distances;
- Opportunity taken to retain the veteran tree on the site with substantial buffer within centrally located area of public open space – “Green Core” as a focal point;
- 2 separate areas of public open space to provide opportunities for ecological enhancement, children’s play and potential allotment area;
- Use of sustainable drainage/attenuation features to provide a mosaic of habitats to include native wetland planting as part of the wider biodiversity enhancements across the site and a buffer to the adjoining commercial uses along Duck End Lane
- Cycle and/or pedestrian links from the adjoining development site;
- Green pockets of incidental open space and amenity space within the built form to provide areas which are typical features of residential development within a village location.

4.0 Framework Plan



- Gross site area 14.02 Ha.
- Proposed vehicular and pedestrian access into site from potential phase 1 development.
- Opportunity to provide cycle and pedestrian links from development site to Duck End Lane permissive right of way.
- The proposals seek to achieve an "outward looking" development, with properties fronting onto the public open space rim of the development site. The outward facing properties will create an attractive and active building frontage and provide passive surveillance to the areas of public realm within the development. It will also provide a suitable development interface with the wider landscape.
- The proposals seek to achieve an "outward looking" development, with properties fronting onto the public open space. The outward facing properties will create an attractive and active building frontage and provide passive surveillance to the areas of public realm within the development.
- Amenity of existing dwellings off Dines Close respected with suitable off-set distances from proposed development.
- Creation of an enhanced and defensible edge to the site and overall settlement to the north east, with the proposed landscape strategy relating and enhancing the site boundaries, set behind a linear public open space. The naturalised planting will soften the perceived built edge and create an appropriate transition to the wider countryside.
- Potential footpath link from Phase 2 development to adjacent Phase 1 development through areas of public open space.
- Existing hedgerows and trees around the site perimeter to be retained. The retention and enhancement of the existing vegetative structure which defines the site boundaries will maintain the verdant character to the site and its setting.
- The proposals seek to incorporate opportunities for a robust scheme of landscaping that would reinforce the existing landscaped setting, ensuring that the proposals can be integrated and with a notable area of public open space to the north western boundary and would provide a breathing space between the proposed development and the listed buildings located along and around Duck End Lane. This would comprise a broad landscape buffer, which itself results in opportunities to establish native wildflower grassland, shrub and trees that combined provide habitat enhancements.
- Area of public open space along the north western boundary of the site. The POS will include the retention of the existing hedgerows and additional native tree and shrub planting to establish a high quality rural edge to the development.
- Proposed native tree and hedgerow planting to northern boundary will provide opportunity for ecological enhancement and ensure satisfactory integration of the built form.

- The proposals seek to achieve an "outward looking" development, with properties fronting onto the linear public open space around existing retained hedgerows within the site. The outward facing properties will create an attractive and active building frontage and provide passive surveillance to the areas of public realm within the development. It will also provide a suitable development interface with the wider landscape.
- Substantial buffer provided to veteran tree within the site. Opportunity to provide centrally located public open space "green core" as focal point of proposed development and to allow the retention of existing soft landscape assets. POS will provide an opportunity for ecological enhancement.
- Sustainable drainage / attenuation features to be included within the POS at the north western corner of the site and south east corner of the site. The sustainable drainage solution provides opportunities for a mosaic of habitats to include native wetland planting as part of the wider biodiversity enhancements across the site. It will also reinforce the high quality landscape setting to the proposed development. To be located outside the restrictive flood zone areas.
- Permissive right of way along Duck End Lane - opportunity to provide cycle and pedestrian links from development site.
- Proposed residential development parcel.
- Existing trees to be retained with suitable off set distance to proposed development.
- Public Open Space along the western boundary providing useable parkland, play areas and potential allotments areas.
- Green pockets of incidental open and amenity space within the built form to provide areas which are typical features of residential development within a village location.
- Adjacent agricultural / commercial use to north western corner of site.
- Opportunity to provide a children play area within public open space to the site core.
- Proposed native tree and hedgerow planting within the site will provide opportunity for ecological enhancement and ensure satisfactory integration of the built form.
- Existing dwellings / buildings by site.



Deliverability

5.0 Deliverability

Paragraph 73 of the NPPF requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their objectively assessed housing need.

Accordingly, it is important that those strategic sites to be allocated through the new plan review are deliverable, and have the potential to commence development within the first five years of the plan period and beyond. This is a key requirement of paragraph 67 of the NPPF, and when considering the overall 'soundness' of the Local Plan.

The glossary to the NPPF defines what is a deliverable site is:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.”

As part of the information gathering exercise for the Local Plan 2030, this site was put forward under the 2015 'call for sites' as site reference 415 (Land on the North East side of Bedford Road), adjoining site 674 (Village Farm, Cotton End Road) to the south-east which, with adjoining land to the north, would form a Phase 2 extension to the land to the west, for which a separate submission has been made on behalf of the Kler Group Ltd.

In its Site Assessments and Potential Options for Allocation published in April 2017, the Borough Council confirmed that the site progressed through the initial Stage 1 appraisal of the site, having regard to such criteria as minimum size, presence of overriding environmental or physical constraints; location within, adjacent or in close proximity to the settlement boundary of a Group 1 or 2 village.

However, the site failed to pass through the Stage 2 where the Borough Council excluded the site from further assessment, the overall conclusion for which *being 'the site is not suitable because it does not relate well to the structure of the settlement'*.

The site is suitable for development - It is sustainable, adjoining the built-up edge of the settlement and within walking distance of all shops and services within the village. Wilstead is a popular and growing village with a number of community and commercial facilities and residential development will assist in maintaining the viability of those existing services and facilities.

The site is available for development - subject to normal planning procedures, there would be no barriers to the commencement of the construction phase of the development.

The development of the site is the achievable - located within a sustainable location and is suitable for residential development. Kler Group Ltd. is committed to the delivery of the site should it be supported for residential development by the Borough Council in its review of the Local Plan.

The site in question is available - the Kler Group Ltd. having a legal interest in the site and it is available for development, subject to normal planning timescales and procedures



Conclusion

6.0 Conclusion

This promotional document has been prepared on behalf of Kler Group Ltd. in respect of land at Duck End Lane, Wilstead, the subject of a single ownership with a willing landowner seeking that the Kler Group Ltd. bring forward the land for residential development.

Whilst the Bedford Local Plan 2030 has been adopted as recently as January 2020, it contains important provisions within Policy 1 requiring an immediate review. That review must have regard to an increased plan period, potentially to 2038 or beyond, and also have regard to the government's standard methodology for calculating housing need as opposed to a locally derived housing need figure as embedded within Bedford Local Plan 2030.

These matters suggest that an additional 10,000 dwellings will need to be identified over and above those contained within the Bedford Local Plan 2030. This is a significant figure.

The Council have a number of options in terms of plan strategy, and it is recognised that it is too early to determine what strategy may be promoted. This promotional document has set out in the planning policy section, options for the Council and some commentary as to key issues which the Council will need to consider in determining what strategy is most appropriate to take forward.

Kler Group Ltd.'s position is that adopting a planned strategy can be broadly categorised as balanced dispersal, including a significant reliance upon delivering smaller sites at the sustainable settlements at the Borough, is the most appropriate strategy when considered against the reasonable alternatives. Such an approach would support housing at Duck End Lane as a consequence of Wilstead containing a wide range of shops, services and facilities commensurate with its position in the current settlement hierarchy identified as a Key Service Centre.

In order to support the Council's approach proposing to allocate the site at Duck End Lane for housing, Kler Group Ltd. have engaged a series of consultants to undertake technical and environmental analysis of the proposed allocation site. The findings in relation to these matters are described earlier within this promotional document. It can be seen that there are no technical or environmental constraints which would indicate that the site is not capable of being brought forward.

The illustrative masterplan which has been derived following a constraints and opportunities analysis which itself has been informed by the technical and environmental testing of the site, indicates that this 14 hectare site could deliver approximately 300 houses, whilst having regard to the above mitigatory measures whilst also deploying the following design and layout principles;

- Outward facing development to provide passive surveillance
- Provision of sustainable drainage systems which also includes opportunities to provide a wide range of biodiversity and habitat enhancements;
- Connectivity with the surrounding footpaths/site
- Provision of 2 on-site public open spaces and pockets within green corridors including children's play and retained veteran tree;

In summary, therefore, Kler Group Ltd. would support the Councils approach to allocating the site at Duck End Lane, Wilstead.

More than a planning consultancy

Cerda Planning Limited

Vesey House

5 - 7 High Street

Sutton Coldfield

B72 1XH

0121 748 1620

office@cerda-planning.co.uk

cerda-planning.co.uk