



Vision Statement



Northampton Road
Bromham
Kler Group Limited

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Prepared by:
Michael Robson BA (Hons) DipTP MRTPI



Introduction

1.1 Executive Summary

Cerda Planning has been engaged by Kler Group Ltd. to promote land at Northampton Road, 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 Northampton Road 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 200 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 and Topography

The site consists of a large agricultural field that extends to approximately 11 hectares, located on the northern side of Northampton Road.

The site is bounded by Northampton Road and Grange Lane to the south; agricultural land to the north and west; and Bowels Wood to the east.

The site is irregularly shaped, following field boundaries.

Levels vary across the site. A topographical survey has been prepared, broadly the higher land is to the north of the site with lower land to Northampton Road. There are further variations in land levels across the site with the low point broadly to the centre of the site and levels to the western side of the site falling to the east and levels on the eastern side falling to the west.

The site is defined by mature hedgerow interspersed with trees. There are no obvious landscape features within the site.

Bromham contains a good range of shops, services and facilities. These include a lower school, village hall, library, supermarket, convenience stores, post office, doctor's surgery, pharmacy, children's play areas, playing fields, churches and public houses.

In addition, Bromham is located approximately 6km to the north west of Bedford, which is the largest town within the Council's administrative boundary and is the focus for administrative, commercial, leisure and retail functions for the Borough.

A footway is located along the northern edge of Northampton Road, with a width of approximately 2 metres. This footway extends to the Grange Lane priority junction to the east, where it crosses over and continues towards the village centre.

The nearest bus stops to the site are located on Northampton Road, to the south east of the site. The north bound bus stop on Northampton Road is located approximately 150 metres from the southern boundary of the site whilst the southbound bus stop on Northampton Road is located a further 150 metres away from the site. Services operate every 30 minutes in the day time, linking Bromham with Bedford and Northampton.



Site location plan

1.3 Planning History

An outline planning application for residential development for up to 200 dwellings, open space and associated works, with all matters reserved except for access was submitted to Bedford Borough Council in 2017 (planning application number 17/01557/MAO).

It was refused for the following 3 reasons:

- The proposal would result in residential development inappropriately located in open countryside contrary to policy H26 of the Bedford Borough Local Plan 2002 and policies CP1, CP13 and CP14 of the Bedford Borough Core Strategy and Rural Issues Plan 2008 and to the sustainable objectives of the National Planning Policy Framework.
- The proposed development would result in built development within an area of open countryside, thereby eroding the open, rural landscape of this area. The development would therefore be harmful to the character and appearance of the rural area contrary to saved policies BE30 (i) and (x), BE35 (i) and (iii) of the Bedford Borough Local Plan 2002, policies CP2 (v), CP13, CP21 (iii) and CP24 of the Core Strategy and Rural Issues Plan 2008; and the aims of the National Planning Policy Framework.
- The proposal would result in the loss of best and most versatile agricultural land contrary to Policy CP2(i) and (ii) of the Bedford Borough Core Strategy and Rural Issues Plan 2008, and the aims of paragraphs 109 and 112 of the National Planning Policy Framework which requires local planning authorities to take account of the economic and other benefits of best and most versatile agricultural land, and where significant loss is demonstrated to be necessary poorer quality land should be used in preference to higher quality land.

A further 3 reasons were cited in relation to the requirement for a Section 106 legal agreement to secure on site affordable housing, on site play and green space and school places.

At the time of determination, the Council could demonstrate a housing supply of 5.71 years and accordingly it was concluded that there was no proven strategic need for the provision of additional housing development in the sites location within the rural policy area and outside of the Settlement Policy Area for Bromham.

The decision was not tested at appeal and it was considered more appropriate to pursue the new plan review.

This document sets out that the time is now right for the site to come forward for allocation for residential purposes through the Plan Review.





Planning Policy Context

2.1 Emerging Local Plan

Planning Policy Context

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. (NPPF) 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 context 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.”



2.1 Emerging Local Plan

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.

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 (allowing for a 15 year plan period from adoption) there is the potential to need to plan for a housing figure in the order of 26,000 dwellings without making 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 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 1305 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. Bromham is ranked number 1 in this settlement hierarchy. 500 new homes are directed to Bromham under policy 4S which should generally be located in and around defined Settlement Policy Area boundaries through Neighbourhood Plans.

2.2 Bromham Neighbourhood Plan

Bromham’s Emerging Neighbourhood plan sets out a vision for Bromham in the period to 2030. The plan has been developed by a Steering Group comprising local people and led by Bromham Parish Council. Work on the Plan has been on-going since 2015. It underwent Examination between March and June 2020 and the Examiner’s report is imminent.

As already set out earlier within this document the adopted Bedford Borough Plan 2030 identifies Bromham as a key growth village which should accommodate a further 500 dwellings to reflect the village’s current status as a Rural Key Service Centre. Under the Localism Act 2011, a Neighbourhood Plan may allocate more land than is required to accommodate the number of dwelling specified in the Local Plan but it may not allocate less.

Emerging Policy HA1 states:

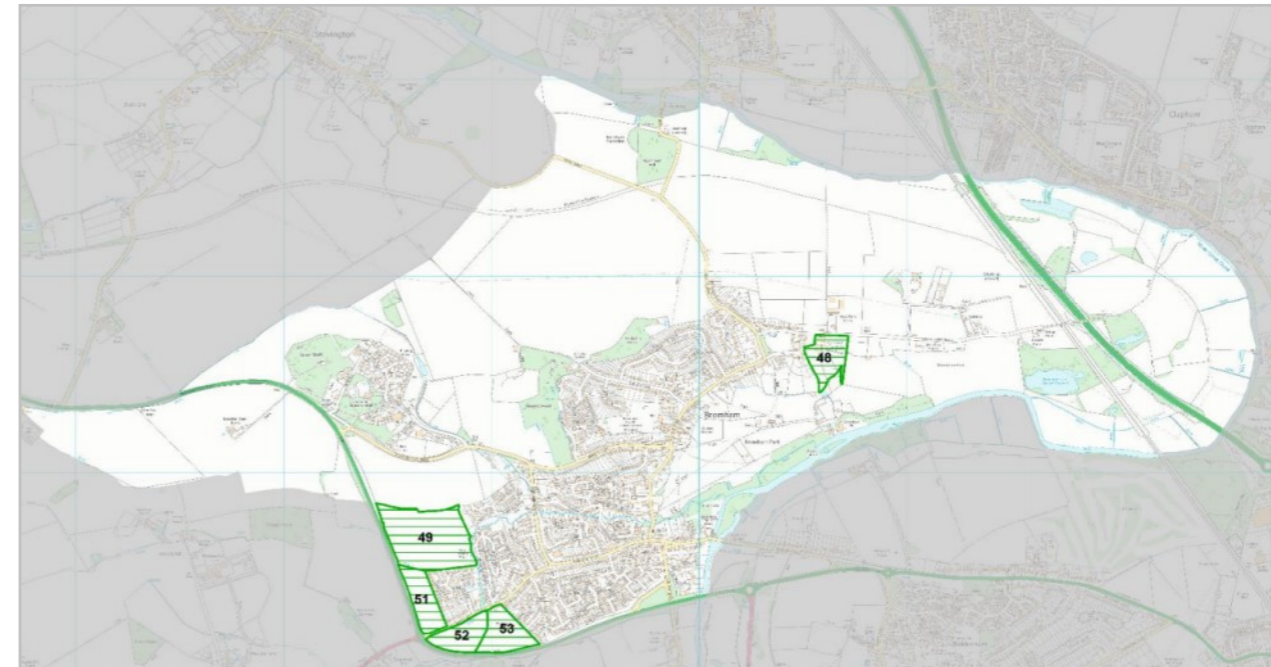
“provided that the development sites meet the requirements set out in other parts of this plan, and of Bedford Borough Council’s strategic priorities at the time of any planning application, the three sites set out and shown in Map 2 should be allocated for development.”

Beauchamp Park (sites 49, 51 and 52)	a minimum of 390
The Stagden Rise Development (site 53)	a minimum of 80
Old Stable Yard Development (site 48)	a maximum of 30
	TOTAL 500

Site housing allocation

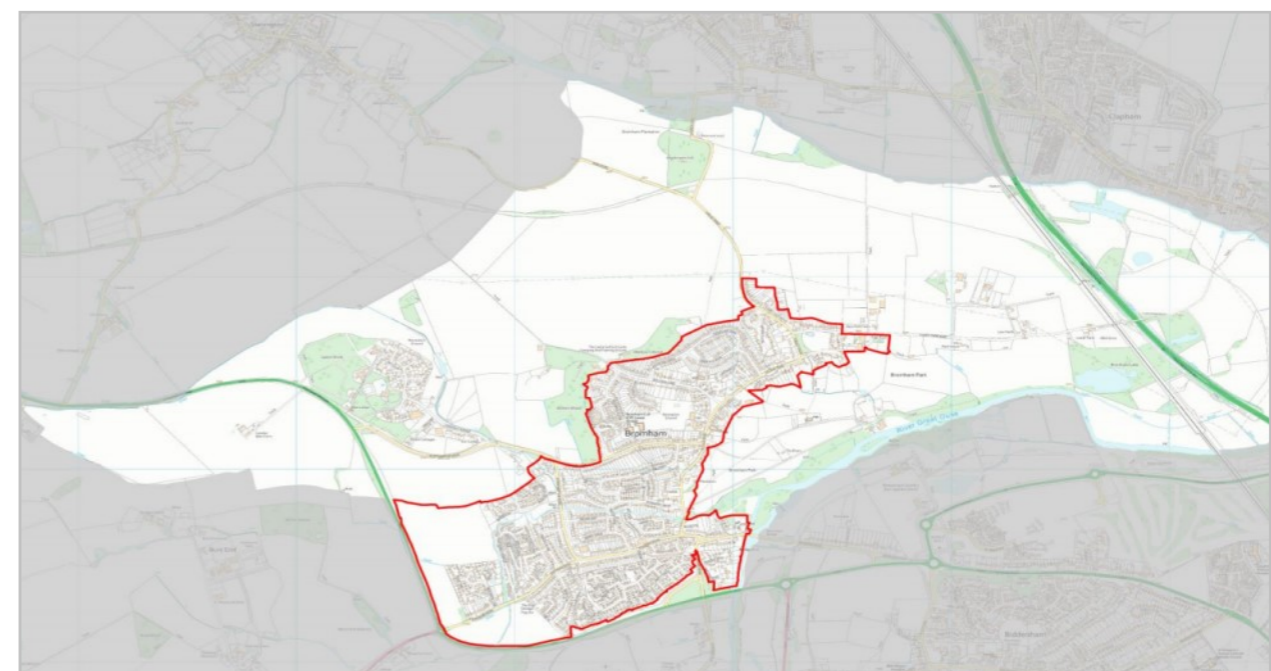
These allocations will create the Settlement Policy Area as set illustrated opposite.

Emerging policies H1 and H2 deal with affordable housing and require 30% on site if viable in accordance with the adopted Local Plan.



Locations of the allocated sites

Settlement Policy Area for Bromham Neighbourhood Area



2.2 Bromham Neighbourhood Plan

Representations have been made to various stages of the draft neighbourhood plan on behalf of Kler Group, most recently in March 2020. Policy HA1 in its current form was objected to as well as to the site selection methodology which concluded that the site at Northampton Road is not a preferred site. The overall assessment states:

“This is a large site of rural character including Grade 2 agricultural land. Highway access is not an issue, although traffic impacts in the village may be. Although the combined sites (site reference 55/412) are technically suitable for development, they would have an environmental impact on the ancient woodland of Bowels Wood, and overlook the Scouting Campus, and were clearly not supported by residents. Accordingly, they were not selected as preferred sites, either singly or jointly.”

The objections made it clear that the site does not comprise of Grade 2 agricultural land and although it is outside of the current Settlement Policy Area it is located directly adjacent to it. It is up to the Neighbourhood Plan to define its Settlement Policy Area. It is not fully understood why the impacts arising from the development of the site was considered to be an issue when Highways officers had not objected to the site within the Call for Sites submission but had recommended that the site proceed to the next stage of consideration. In addition to this there was no objection to the 2017 planning application for the site as discussed elsewhere in this document.

It is entirely possible that the site at Northampton Road substitutes one of the currently proposed allocations, or as a fallback position, be allocated as a housing site to deal with the likely 10,000 additional homes that will be required over the next plan period.



2.3 Site Assessment

Adopted Local Plan

Policy 3S – Spatial Strategy of the adopted Bedford Borough Local Plan 2030 states that there will be 'strategic residential development in key service centres in association with expanded education provision where necessary'.

Bromham 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 (500 homes each) between the four named settlements of Bromham, Clapham, Great Barford and Sharnbrook, and to be delivered through Neighbourhood Development Plans.

Bromham was ranked within Group 1 of the Rural Settlements and in joint first place (with Clapham) within the Settlement Hierarchy in September 2018 in terms of scoring of the six named 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.

Neighbourhood Plan

As referred to earlier in this document, Bromham Parish Council are in the process of preparing a Neighbourhood Plan, It has been progressing since 2015 but is not yet "made".

The Summary of Site Assessments for the emerging Neighbourhood Plan, in relation to the Northampton Road site ('call for sites' reference 55/412), states that the site is:

"not a preferred site. This large site of rural character including Grade 2 agricultural land. Highway access is not an issue, although traffic impacts in the village may be. Although the combined sites are technically suitable for development, they would have an environmental impact on the ancient woodland of Bowels Wood, and overlook the Scouting Campus, and were clearly not supported by residents. Accordingly, they were not selected as preferred sites, either singly or jointly."

A proportion of those homes may or may not be identified for allocation at Bromham. If additional housing is identified to be allocated at Bromham, in the review of the adopted Bedford Borough Local Plan 2030, this would have the effect of rendering the current emerging Bromham Neighbourhood Plan 2030 out of date since it would be aligned with the current Local Plan and not the emerging Local Plan.

Given the investment that is being put into the preparation of the Neighbourhood Plan, proper consideration should be given to the allocation of reserve sites in the Neighbourhood Plan to be brought forward in the event that the review to the Bedford Borough Local Plan 2030 requires additional houses to be delivered at Bromham. If such an approach were to be taken, it would ensure that the Neighbourhood Plan is not rendered out of date at the point at which the review to the Bedford Borough Local Plan 2030 is adopted.

When considered against the reasonable alternatives, the land at Northampton Road, is a site that has been tested in detail by Council through the submission of an outline planning application in 2017.

Refusal of permission

As set out in earlier sections of this document an outline application for residential development for up to 200 dwellings, open space and associated works, with all matters reserved except for access was refused in 2017 (planning application number 17/01557/MAO). There were 6 reasons for refusal but in essence there were 6 main areas of concern as follows:

1. Inappropriate location within open countryside
2. Impact on the character and appearance of the rural area
3. Loss of best and most versatile agricultural land
4. No provision for on-site affordable housing (S106)
5. No provision for on-site public open space/green infrastructure (S106)
6. No provision for additional school places (S106)

1. Housing Land Supply

The first point above concerns *housing land supply*. The refusal of the application for the site was based upon the Council being able to demonstrate 5.71 years' housing land supply. The Inspector dealing with an appeal in relation to another site in Bromham at around the same time in 2017 concluded that, at the time of the appeal, the Council could demonstrate a 5.71 year housing land supply. Housing land supply issues are not relevant in relation to plan making, and it is the plan making process which determines the extent of open countryside.

2.3 Site Assessment

At this early stage, the Council have not identified the strategy for delivering approximately 30% increase in the annual housing target, as well as the increased housing requirement arising from having to roll forward the plan period to at least 2035. What is known, however, is that the increased requirement is likely to be in excess of 10,000 additional homes to be allocated across the Borough.

2. Character and appearance

With regard to the second reason, *effect on the character and appearance of the rural area*, the open and agricultural nature of the land is acknowledged. In support of this document, a Landscape and Visual Impact Assessment has been carried which concludes that the proposed development of the site would have a moderate significance of effect upon landscape character, and no more than a moderate significance of effect on visual receptors by year 10 following completion with landscaping mitigation measures. The Inspector in 2017 concluded that, if residential development was necessary in Bromham, then any development in the countryside would inevitably have some impact. On balance, therefore, and in line with the Inspector's consideration of the previous development proposals, the LVIA concludes that, whilst the development of the site would inevitably have some effect, the visual impact upon the character and appearance of the area would be limited and localised.

Further, there is no indication that there will be any environmental impact upon the ancient woodland of Bowels Wood along the eastern boundary of the site. Again, the arboricultural, ecological and landscape studies prepared in respect of the earlier planning application and this submission do not indicate that there would be a harmful impact on ancient woodland subject to the proviso of appropriate stand-off (15 metres minimum) and layout design considerations. Specific environmental issues in terms of Bowels Wood were not raised in the reasons for refusal, and it is not considered that the position has altered subsequent to the refusal of the planning application in 2017.

3. Agricultural land classification

With regard to the third reason, *agricultural land classification*, the Summary of Site Assessments for the emerging Neighbourhood Plan states that, in relation to this site, it is *'not clear from map but contiguous with Grade 2 land and clearly farmed at present'*. The assessment of the ALC that has been carried out for this site indicates that the ALC is Grade 3b and not Grade 2 and, therefore, is not the 'best and most versatile' agricultural land and does not, therefore, conflict with development plan policy, nor the guidance in the NPPF relating to the scarce resources of such land.

4. Affordable Housing (S106)

With regard to the fourth reason, *making adequate provision for affordable housing*, the site would be able to deliver appropriate levels of affordable housing (in terms of quantum, mix and tenure) and secured through an appropriate mechanism in accordance with an identified local need and in line with the appropriate policy in the adopted Bedford Borough Local Plan 2030 or as reviewed.

5. Open Space/green infrastructure (S106)

With regard to the fifth reason, *making provision for on-site play and informal/open space*, the development of the site would, of course, provide such facilities through an appropriate mechanism and in line with the appropriate policy in the adopted Bedford Borough Local Plan 2030 or as reviewed or the Council's supplementary planning documents where appropriate.

Included within this submission is a framework plan which has been prepared to show how the proposed development of the site could look. It indicates the provision of linear open space throughout the layout with ecological open space acting as a buffer to Bowels Wood, together with SuDs attenuation feature and native tree planting around the northern, eastern and western boundary.. The formal details of these areas can be determined through the normal planning process, in due course should the site be allocated.

6. School Places (S106)

With regard to the sixth reason, generating demand for additional school places, as part of the draft Neighbourhood Plan exercise, the potential impact of some 400-500 new houses in the village upon school places was considered. The existing Bromham CofE Primary School became a three form entry Primary School in September 2018.

As with the provision of affordable housing, it is acknowledged that the development of new houses in the village would generate the need for an additional pupil spaces which the draft Neighbourhood Plan envisages will be met through further expansion of the existing Primary school. Of course, it would be expected that any new housing development, including of the site at Northampton Road, would contribute towards the provision of educational places, a need that would be secured through normal mechanisms.

It is noteworthy that, in concluding upon the 2017 appeal, the Inspector summarised that the only reason why the development could not have proceeded was due to the fact of there being a favourable housing position across the Borough at that time where housing was not needed in the Rural Policy Area. That criticism cannot now be levied against the site given the provision of the adopted Bedford Borough Local Plan 2030 which requires 500 houses at Bromham, and the draft Bromham Neighbourhood Plan which is seeking to make positive allocations of land for housing.

We would, therefore, recommend that the Northampton Road site be substituted for one of the currently proposed allocations or, as a fall-back position, be allocated as a reserve site to guard against the Neighbourhood Plan being rendered out-of-date in the context of the immediate review to the Bedford Borough Local Plan 2030.



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 document.

Constraints

The site's eastern boundary is defined by an adjacent area of woodland known as Bowels Wood. Public access to, and appreciation of the extant trees is restricted to those occurring immediately adjacent to the north of Northampton Road only. It is the only tree cover within influence of the site afforded protection within a Tree Preservation Order (TPO). TPO no. 7/190/2/008 is a woodland order made in 1960, subsequently, it affords protection to all trees within Bowels Wood, regardless of age. Background checks have also revealed that the site does not occur within a Conservation Area. Accordingly, the amenity value of the trees is not elevated to preserving or enhancing any unique or distinctive interest linked to the setting.

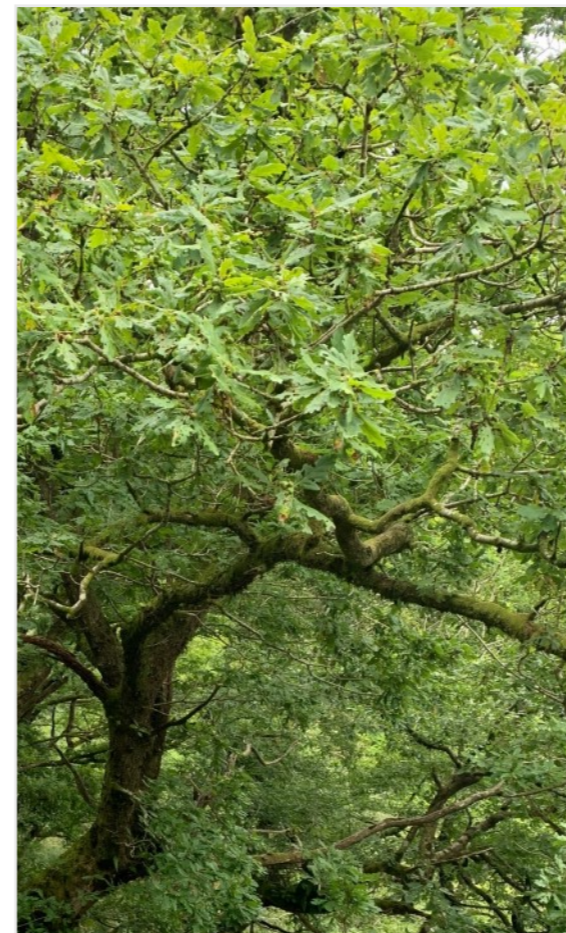
Bowels Wood



Bowels Wood is an area of designated ancient woodland; 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.

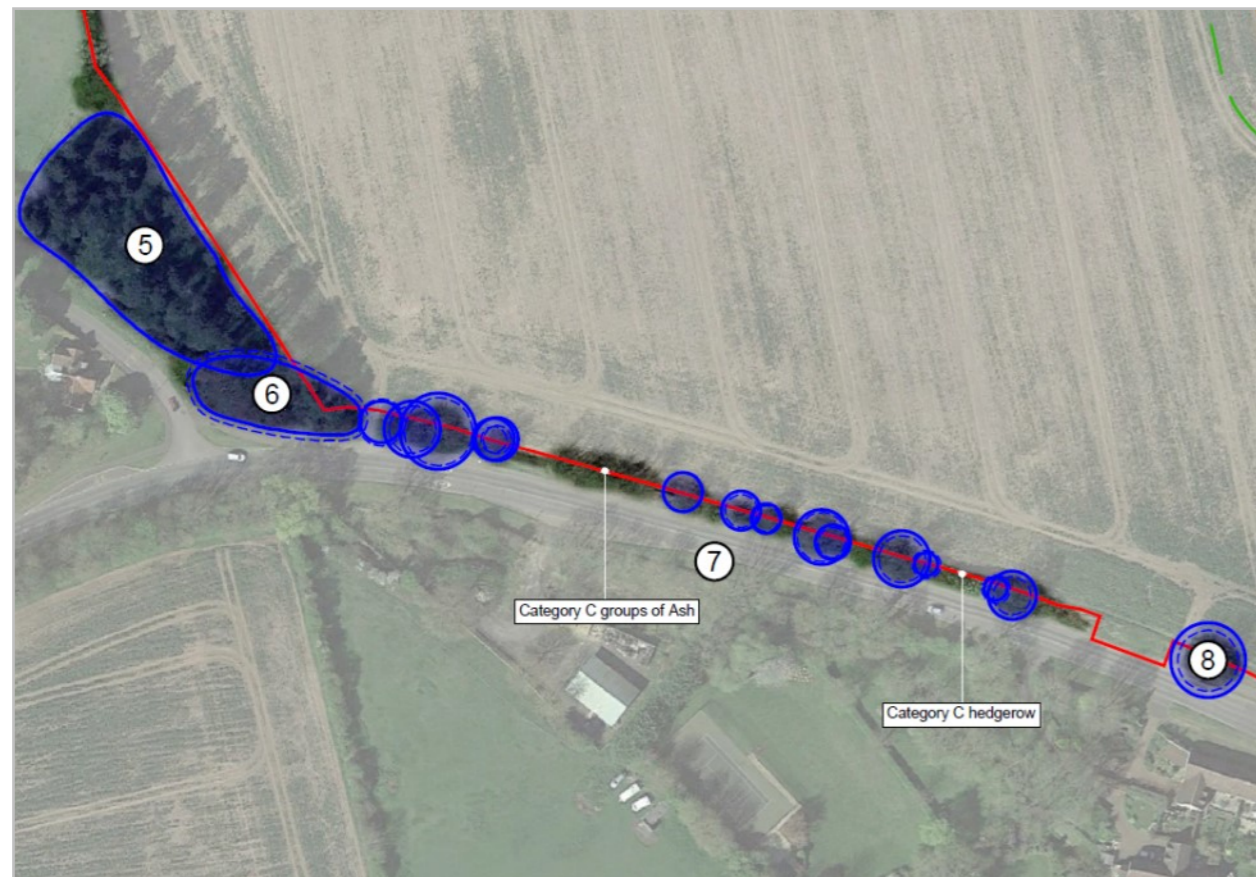
Typical of a lowland deciduous woodland, the dominant species consist of English Oak and Ash, with an understorey of Field Maple, Elm, Hazel, Hawthorn and Blackthorn. As a major and irreplaceable landscape feature, the woodland also readily warrants Category A within BS5837:2012 guidance, reinforcing its status as a constraint (notwithstanding its third party status). In accordance with current Forestry Commission and Natural England Standing Advice, Bowels Wood has been provided with a 15m buffer zone intended to protect the woodland; during the master planning process the buffer would enable space to contribute to wider ecological network and form part of the green infrastructure of the area. Were the site to receive development, agricultural cultivation within the RPAs of the woodland's edge components would cease and prevent regular root disturbance within this area; this would complement the role of the buffer and provide a tangible benefit to the woodland edge trees. The buffer is illustrated with a dashed green line.

Bowels Wood with buffer



3.1 Arboriculture

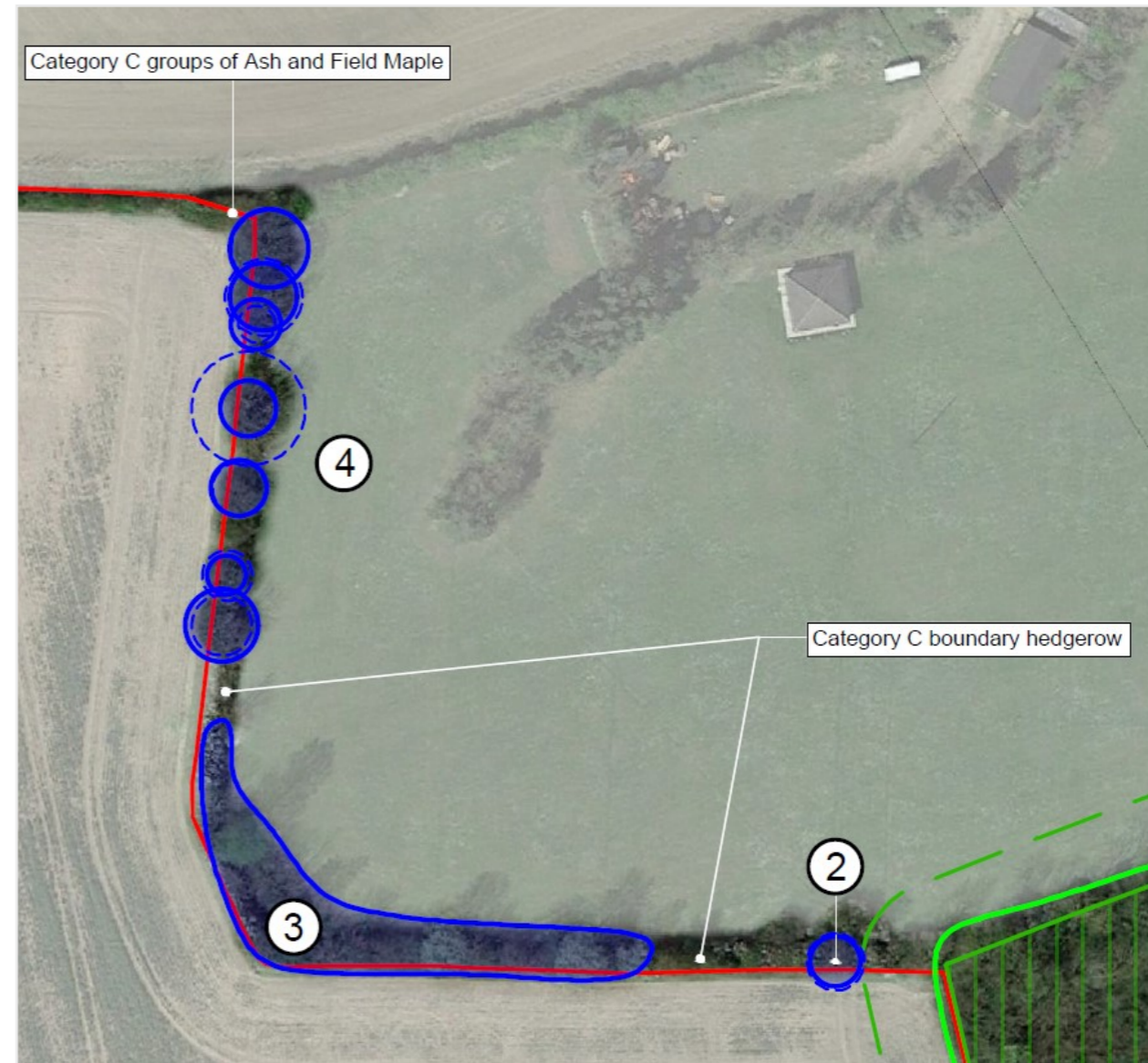
Two individual trees; one Field Maple on the northern, and one Ash on the southern boundary warrant consideration as category B components on their individual merit. The site's other moderate quality tree cover all occur as aerodynamically cohesive or partially cohesive collections on or just outside the boundaries. Of these, those adjacent to the southern boundary and at the site's western extent are the most readily appreciable from the public realm. Despite limited individual arboricultural significance, collectively the trees provide a moderate, albeit informal, contribution to amenity. It should be noted that the structures of the majority of the Ash trees on the southern boundary are multi-stemmed and positioned on top of a steep roadside bank. Both of these factors will have a critical bearing on the trees' future outlook if their exposure or ground levels were to change.



Location of the site's category B trees adjacent to Northampton Road

Two groups of trees immediately adjacent to the site's north eastern extent are considered to be of moderate quality when considered on their collective merit and contribution. The eastern group is formed of five mature English Oak, which have developed as an intermittently cohesive feature; and, the western collection is an early mature planted shelterbelt. Both are growing as groups, such that they attract a higher collective rating under BS5837 guidance than they would as individuals. Subject to

sensitive layout design, the trees would be unaffected by the introduction of development to the promotional site.



Location of the site's category B trees at the north-eastern extent.

The remaining low quality tree cover consists of agricultural field boundary hedgerows. The trees have established within the hedgerows through the absence of management, similarly, through neglect, a small naturally colonising scrub group has established adjacent to the southern boundary. At their current age and size, the low quality trees are readily replaceable; they do not serve any particular role or function within the setting, and are incidental to the current land use.

3.1 Arboriculture

Opportunities

It is anticipated that some tree loss will be inevitable to accommodate new development on the site, i.e. to form vehicular access. The distribution of the significant trees on the boundaries and the ancient woodland to the east, allows for development parcels within the fields, and interconnectivity between, without necessitating the removal of, or detriment to, moderate or high quality trees. Subject to arboricultural input during design, it is realistically probable 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, and outliers in particular, provides a ready opportunity for enhancing the extant tree stock in terms of canopy coverage and distribution. A well designed development could provide an increased quantum of large canopy bearing species within open space areas, including the buffer to Bowels Wood. In addition, domestic scale tree coverage can be secured within residential parcels where space is more constrained. In combination, this would complement and reinforce Bowels Wood, and the site's other important boundary trees. The implementation of an appropriate landscape scheme can ensure a robust transition with the wider streetscape, whilst a varied planting palette can provide tangible gains in tree quality and resilience.



3.2 Ecology and Biodiversity

Aspect Ecology has undertaken a desk study and Phase 1 Habitat survey on the site in order to inform this document. Detailed Great Crested Newt and bat surveys have also been carried out.

Overview of the Ecological Status of the Site

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.

Ecological Designations	
Constraint	<i>Low-Moderate</i>
Notes	<p>Statutory Designations</p> <p>The site itself is not subject to any statutory ecological designations. The nearest statutory designation is Hanger Wood Site of Special Scientific Interest (SSSI) located approximately 1.0km to the south of the site. Hanger Wood SSSI is designated as one of the best remaining examples of Ash-Maple woodland in the county. The next nearest statutory designation is Biddenham Pit SSSI located approximately 2km south-east which is designated for geological interest. The site is located within the Impact Risk Zone (IRZ) for Hanger Wood SSSI, although the IRZ does not apply to residential developments.</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 Bowels Wood County Wildlife Site (CWS) located adjacent to the east of the site. Bowels Wood CWS comprises ancient seminatural woodland, with a canopy dominated by Oak and Ash. The next nearest non-statutory designation is Molliver's Wood CWS, located approximately 0.4km to the east of the site. Molliver's Wood CWS comprises a relatively small block of ancient semi-natural woodland, with a canopy dominated by Oak and Ash.</p>

A minimum 15m buffer between the development area and the adjacent Bowels Wood CWS ancient woodland is required as per Natural England standing advice for ancient woodland. The inclusion of the ecological buffer will mitigate against negative effects (e.g. dust deposition and pollution) on the woodland during construction and minimise disturbance (e.g. light spill) to any associated nocturnal wildlife, such as bats, during the operational phase.

Habitats

The hedgerows and trees within the site are important ecological features of value at the local level. As such, these features should be protected, retained and incorporated within the scheme design as far as practicable; alternatively, replacement habitat would be needed.

Habitats	
Constraint	<i>Low</i>
Notes	<p>The site is dominated by a large, open, intensively managed arable field cultivated with Wheat <i>Triticum sp.</i> and bordered with narrow, field margins. A single, short sward (~10cm) rough grassland field is also present at the south-east corner of the site. The single grassland field and narrow field margins comprise a low diversity of common and widespread species. The arable field and associated margins and single grassland field do not constitute important ecological features.</p> <p>A total of six hedgerows demark field boundaries within the site, a number of which contain young to mature standard trees. Two hedgerows at the north-east boundary are likely to qualify as ecologically 'important' under the Hedgerows Regulations 1997 (as amended) and all hedgerows within the site are likely to qualify as a Priority Habitat.</p> <p>Adjacent to the east of the site is Bowels Wood CWS, an ancient seminatural woodland. The woodland edge habitat adjacent to the site comprises dense scrub, with semi-mature to mature trees beyond. The ancient woodland associated with the CWS is a Priority Habitat, is deemed 'irreplaceable' and is of inherently high ecological value. A stream, which was dry at the time of survey, is located adjacent to the south-west corner of the site and connects to a pond to the northwest of the site.</p> <p>A dry ditch is located along the eastern site boundary and does not appear to hold water for any substantial period of time. The hedgerows, mature trees and stream, within the site are of ecological value at the local level. Bowels wood, adjacent to the site, is considered to be of County level value. The other habitats within the site are of negligible ecological value.</p>

3.2 Ecology and Biodiversity

Fauna	
Constraint	Low
Notes	<p>Bats – a single tree at the north of the site, within a boundary hedgerows, has moderate suitability to support roosting bats, with other trees present at the site boundaries having features of no more than low suitability to support roosting bats. The boundary hedgerows and adjacent woodland offer potential foraging and commuting opportunities for bats.</p> <p>Badger – no Badger setts were recorded within the site although evidence of Badger in the form of worn paths was recorded within the site. Several records of Badger were returned from BMRC for the surrounding area. The arable crop is likely to provide a seasonal foraging resource for local Badger. It is therefore possible that Badger utilise the site for commuting and foraging.</p> <p>Great Crested Newt – records of Great Crested Newt were returned from BMRC within 2km of the site. No aquatic (breeding habitat) is present within the site and the vast majority of the site (arable) is of negligible value to Great Crested Newts. The two off site ponds, situated within 250m of the site were subject to Great Crested Newt presence / absence surveys in 2017, which confirmed this species to be absent. It is therefore considered highly unlikely that Great Crested Newt utilise the site.</p> <p>Reptiles – the vast majority of the site (arable) provides habitat of poor suitability for reptiles. Information returned from BMRC included records of common reptiles from within the local area but none from within the site itself. Small numbers of reptiles could make use of the boundary habitats on an <i>ad hoc</i> basis.</p> <p>Birds – several species of common bird were recorded within the site boundary including Green Woodpecker, Great Tit, Wood Pigeon, Crow and Jackdaw. Information received from BMRC included records for several Priority Species and Red List bird species within 2km of the site including Skylark, Spotted Flycatcher, Marsh Tit, Song Thrush, House Sparrow and Yellowhammer</p>

Bats

A single tree within a boundary hedgerow at the north of the site is considered to be of moderate potential to support roosting bats. The network of hedgerows, the woodland edge associated with Bowel's Wood CWS to the east, and the coniferous plantation to the south-west provide potential foraging and commuting habitat for bats. Providing a future scheme design retains, enhances and protects 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 the tree with moderate potential for roosting bats be required to be removed / pruned to facilitate the proposals, then further survey effort in the form of dusk emergence / dawn re-entry surveys would be required. Should the tree be confirmed as having roosting bats present, then further survey effort would be required and a Natural England licence would be needed to enable felling / pruning. Bat activity surveys (comprising manual walked activity and static monitoring), to establish the use of the site by foraging and commuting bats are recommended and can be undertaken between April - October. The scope of the bat activity surveys should ideally be agreed with the LPA Ecologist.

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, comprising arable, provides negligible terrestrial habitat for amphibians and no breeding habitat suitable for Great Crested Newt is present. Potential terrestrial habitat is limited to the boundary hedgerows and woodland edge. Two ponds with suitability to support breeding Great Crested Newt are present within 250m of the site, however eDNA surveys of these ponds found no evidence of this species in 2017. As such, it is highly unlikely Great Crested Newt are present within the site or surrounding area. Accordingly, it is highly unlikely that Great Crested Newt will pose a constraint to the future development of the site.

Reptiles

Limited and discrete areas of suitable habitat for reptiles are present on-site, with the vast majority of the site (arable) being of negligible value to reptiles. Given the minimal suitable habitat present within the site, no further surveys in respect of reptiles are recommended.

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.

3.2 Ecology and Biodiversity

Opportunities & Enhancements

Development of the site presents a number of opportunities to deliver numerous net gains for biodiversity such as:

Habitat creation / enhancement – the development of the site provides the opportunity to enhance existing habitat as well as create new habitat of greater value to wildlife. An ecologically guided management plan should be implemented in order to maximise the biodiversity value of the habitats and features retained by the scheme. Retained hedgerows could be bolstered and enhanced by planting additional native species to increase species richness. Any new habitat to be created by the scheme should where practicable, be located adjacent to existing habitat of elevated value (either on-site or adjacent) to create larger areas of habitat of benefit to wildlife, rather than smaller less well-connected areas of habitat. This would contribute to the local biodiversity networks. The minimum 15m of buffer habitat required adjacent to the ancient woodland provides an opportunity to provide a long linear stretch of new species-rich habitat whilst buffering the woodland. New habitat could include new woodland / scrubland, species-rich hedgerows, species-rich wildflower grassland, community orchard and wetland habitat including ponds. Where practicable, new habitats should be incorporated within the same area in order to create a mosaic of habitats, rather than distinct blocks of separate habitat types. More formalised open space for recreational purposes could also include features of benefit to wildlife such as flowering lawns and nectar rich non-native planting, thereby still providing opportunities for wildlife.

Habitat connectivity – Existing hedgerows can be enhanced by planting up gaps and widening where appropriate with additional native species, and by providing wider associated grass margins. Species-poor hedgerows could be improved by the incorporation of additional native species.

Bats – the habitat creation and enhancements described above will increase foraging and commuting opportunities for local bats. Additional opportunities for roosting bats could be provided through the provision of a range of bat boxes for a variety of species as well as for summer and winter roosting. A range of styles for inclusion on both retained trees and newly constructed buildings should be provided. The boxes should be located in close proximity to habitat of benefit to bats.

Amphibians and Reptiles – the habitat creation, management and enhancements described above will increase breeding, foraging and shelter opportunities for local amphibians and reptiles. In addition, specific features for the benefit of amphibians and reptiles such as hibernacula, loggeries and brash piles could also be incorporated within areas of suitable open space. The addition of a wildlife pond would also provide breeding habitat for a range of amphibians.

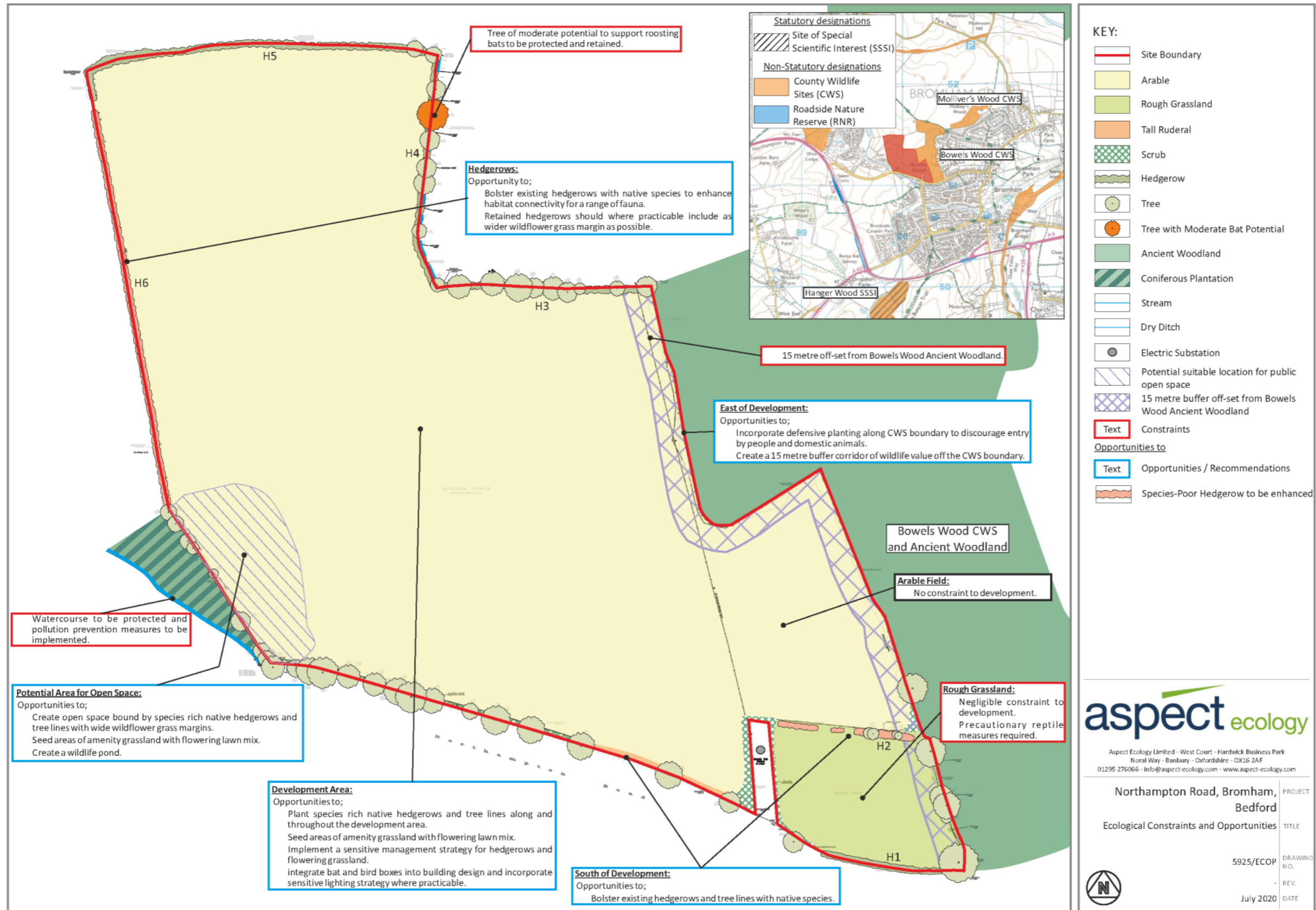
Birds – the habitat creation and enhancements described above will increase foraging opportunities for local birds. Additional nesting opportunities could be provided through the provision of a range of bird boxes for local species. A range of box styles for inclusion on both retained trees and newly constructed buildings should be provided.

Conclusion

Subject to a future scheme being sensitively designed, with ecological input, the ecological impacts can be minimised and subject to the implementation of appropriate avoidance, mitigation and compensation measures, it is considered unlikely that the future development of the site would result in significant harm to biodiversity. Indeed, the future development of the site provides the opportunity to secure a number of biodiversity enhancements.



3.2 Ecology and Biodiversity



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. It concludes that the site is not subject to any qualitative landscape designations and is located adjacent to existing built form to the south. It is considered that the site has the capacity to accommodate a sensitively designed residential development which would not give rise to significant landscape or visual effects.

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. It also takes account of the landscape and visual assessments which were carried out to support the previous planning application.

Topography

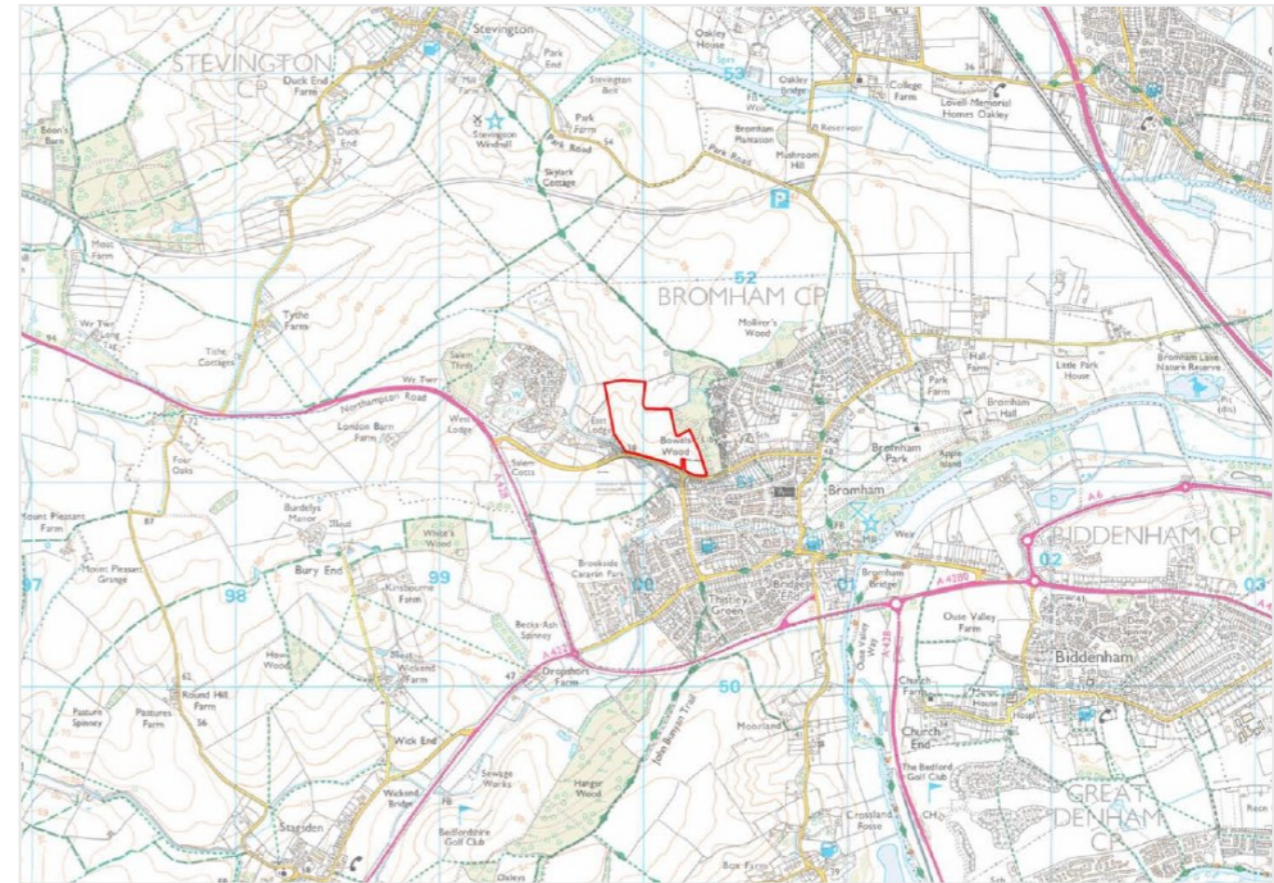
Within the wider setting, the site is located within a rolling landscape to the north west of the settlement of Bedford. The site itself is situated on a south west facing slope, with the high point being at the north eastern corner, at approximately 56m AOD, falling approximately 18m to the south western boundary, that lies at approximately 38m AOD.

Public Rights of Way

The site is not publicly accessible and there are no public rights of way adjacent to the site boundary or within the immediate setting. However, there are number of Public Rights of Way located within the local landscape. There are two bridleways located to the north and south of the site, and a footpath located to the east of Bowels Wood. The most notable routes are The John Bunyan Trail / Ouse Valley Way, these Long Distance Routes run on the same route to the north of the site. There are several other footpaths and bridleways within the wider landscape context of Bromham and these are illustrated below.

The Visual Environment

Views of the site are localised as a result of the surrounding topography, built form and vegetation structure. Limited public access within the wider landscape ensures that opportunities of views towards the site are limited. The presence of Bowels Wood ensures that there are no publicly accessible views from the east. The localised enclosure is reinforced by the undulating topography and wider settlement that characterises the local setting and as such there are limited opportunities for middle or longer distance views.



Site location with public rights of way

Overall given the size of the site, it is visually well enclosed from the wider surrounding landscape, with the higher ground within the centre of the site being the most notable feature. The landscape strategy for the Proposed Development would seek to retain and reinforce this degree of existing enclosure through the establishment of a comprehensive site wide green infrastructure that would include native shrub, hedgerow and tree planting with areas of wildflower grassland providing a biodiversity net gain.



3.3 Landscape

- Opportunity and Constraints Plan



3.3 Landscape

Landscape and Visual Review and Opportunities & Constraints

With a development of this type and scale there is a risk of adverse landscape and visual effects if the proposals are not carefully and sympathetically designed. However, it is envisaged that the development of this 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.

Proposals would incorporate the following elements:

- Creation of an enhanced and defensible edge to the settlement to the north and west, enhancing the separation between the site and wider landscape setting to the north and the residential area to the west. This can be achieved through the management and reinforcement of the existing planting on these boundaries. The hedgerows should be enhanced with further native hedgerow planting with scattered hedgerow trees, this would create a robust landscaped edge to the development and with the wider setting.
 - The naturalised planting would also soften the perceived built edge and create an appropriate transition;
 - An offset to Bowels Wood to be incorporated to ensure an appropriate buffer to the Ancient Woodland is achieved. This would comprise a broad landscape strip, 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;
 - Retention of mature trees and hedgerows at the site boundaries. Retained vegetation will be supplemented by proposed native tree and hedge planting within the development to reinforce the vegetated character of the settlement edge. Where vegetation removal is necessary along the southern boundary to accommodate access, new planting would be established behind sight lines
- to ensure that a green approach to Bromham from the west 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 development and also provide passive surveillance to the areas of public open space within the development;
 - Areas of public open space, providing opportunities for play and informal recreation, should be incorporated as part of the development. As shown on the illustrative layout, a broad linear park is included between the development parcels ensuring that views from Northampton Road, on approaches to Bromham from the west, towards Bowels Wood, can be maintained. this feature also breaks up the proposed built environment and provides green corridors through the site for recreation and wildlife purposes;
 - Tree planting and wide verges incorporated within the residential area to break up the appearance of urban development, and ensure the presence of tree planting within the development and connect with the wider landscape. The proposed landscaping will not only assist in integrating the proposed built form, but also create a high quality environment in which to live;
 - Incidental open spaces within the development would also assist in breaking up the perceived built environment and provide opportunities for feature planting that will contribute to placemaking; and
 - Sustainable drainage / attenuation features to be included within the localised low point of the site, in the south western corner. Not only is this a sustainable drainage solution, but opportunities exist to provide native planting around the feature as part of the wider biodiversity enhancements across the site, creating a high quality landscape feature within the development
 - Incorporate a simple palette of materials and architectural detailing that reflect the local vernacular.



3.4 Transport

ADC were commissioned to provide transport advice to support the promotion of the site for residential development.

The site was previously subject to a planning application (planning reference 17/01557/MAO) for up to 200 dwellings with access taken from both Northampton Road and Grange Road. Bedford Borough Council refused the application in September 2017 on the grounds of landscape impact and loss of agricultural land. There was no objection on transport and highway grounds.

Existing highway Environment

The proposed development would be in the western part of the village of Bromham. The site is to the north of Northampton Road and Grange Lane and is currently used for agricultural purposes. Grange Lane is restricted to vehicles less than 6m in width. Northampton Road is around 7m wide and Grange Lane is approximately 5.8m wide. To the southwest of the site, adjacent to the Chestnut Avenue/Northampton Road junction, there is a speed limit change point where the national speed limit starts for vehicles driving away from the village and a 40mph speed limit for vehicles driving towards the village. There is a further speed limit change point on Northampton Road, mid-way along the site frontage where the speed limit changes from 40mph to 30mph.

There are footways on both sides of the carriageway on Northampton Road as well as on the southern

Site location with public rights of way



side of Grange Lane. Between the two vehicular access points for the development, there is a 3m wide shared footway/cycleway that extends to a dropped kerb crossing at the Grange Lane/Northampton Road junction. The shared footway/cycleway continues southward on Northampton Road and extends to Stagsden Road, providing connectivity to facilities within the village.

Access

The proposed development would be accessed via two new priority-controlled T-junctions. Providing two accesses enhances connectivity and allows flexibility for construction access.

The western site access would have a 6.75m wide carriageway with 6m kerb radii. A 2m wide footway would be provided on the western side whilst a 3m wide footway/cycleway would be provided on the eastern side. The eastern access would have a 5.5m wide carriageway with 6m kerb radii. A 2m wide footway would be provided on the eastern side of the carriageway and would extend to the existing footway adjacent to the Grange Lane/Springfield Drive junction whilst a 3m wide footway/cycleway would be provided on the western side of the carriageway.

Regarding visibility for the site accesses, as part of the Transport Assessment for the previous application, speed surveys were undertaken in April 2017 using a radar speed gun. The recorded 85th percentile speeds are shown in the table below. When calculating the visibility splays, Manual for Streets guidelines are followed when 85th percentile speeds are less than 60kph (37mph). Therefore, all visibility splays within the highways drawing have been shown in accordance with Manual for Streets apart from the Northampton Road eastbound splay where DMRB absolute minimum guidance has been followed.



3.4 Transport

Direction	85th percentile
Northampton Road eastbound	41.2mph
Northampton Road westbound	30.2mph
Grange Lane eastbound	27.0mph
Grange Lane westbound	26.2mph

A Stage 1 Road Safety Audit (RSA) was undertaken as part of the Transport Assessment in April 2017. BBC raised no objections to the access proposals including the visibility splays.

A pedestrian access would be provided in the southwestern corner of the site to enable access to the bus stops adjacent to the Chestnut Avenue/Northampton Road junction as well an alternative connection to the footway on the northern side of Northampton Road.

Sustainability

For commuters and school pupils without mobility impairment walking to local amenities, up to 500

Pedestrian catchments



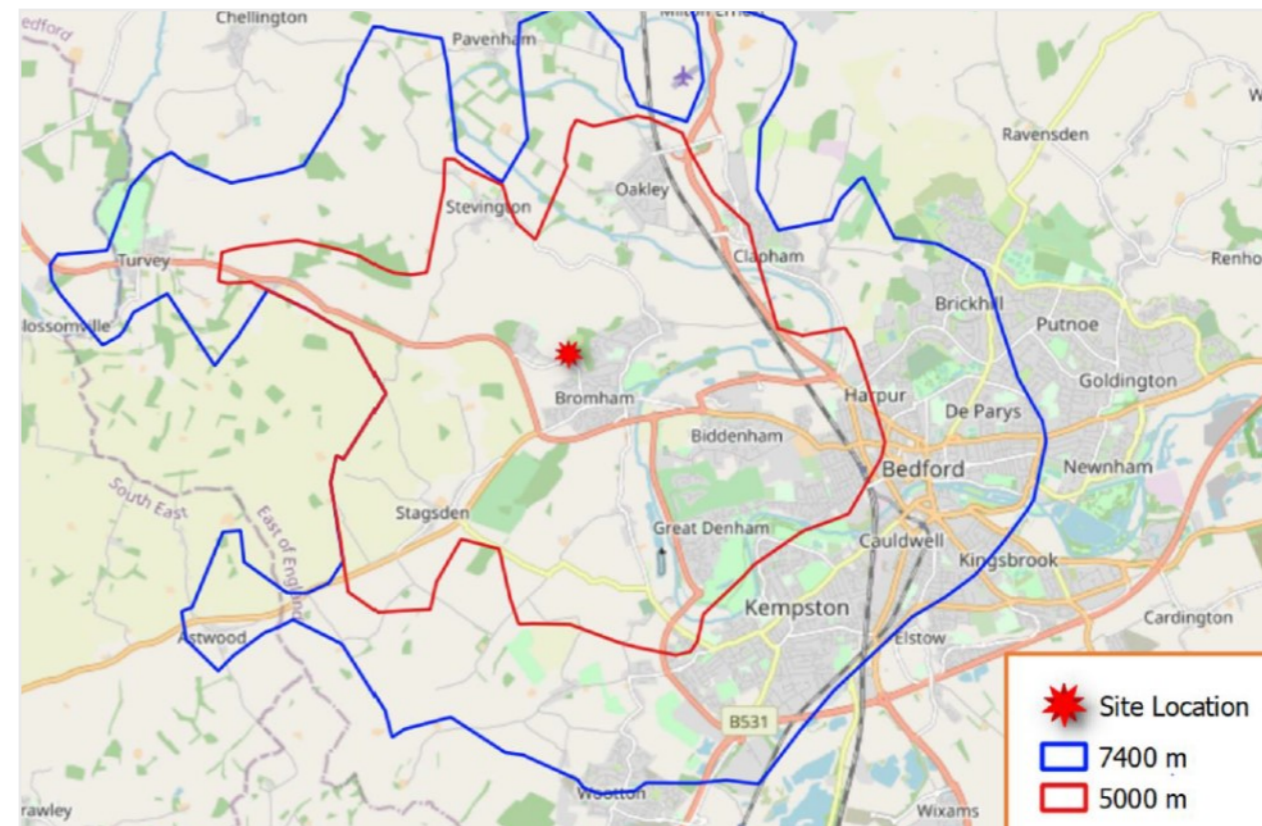
metres is the desirable walking distance, up to 1,000 metres is an acceptable walking distance, and up to 2,000 metres is the preferred maximum walking distance

The centre of Bromham and its associated facilities are within 1km walking distance of the site including Budgens supermarket and Bromham Church of England Lower School. They can be accessed via the shared footway/cycleway on the northern and eastern side of Northampton Road and the footway on the southern side of Grange Road.

Cyclists are typically prepared to travel up to 5km for non-leisure journeys, such as those to school or work. The National Travel Survey³ records an average journey time for cycle trips of 23 minutes, 7.4 miles at an average cycle speed of 12mph⁴. The figure below shows cycle catchments from the centre of the site. Within 5km the western edge of Bedford town centre can be reached, and within the 7.4km catchment much of Bedford is accessible.

The nearest bus stops to the site are on Northampton Road, to the southwest of the site, adjacent to the site frontage and approximately 275m from the western site access. These stops are served by the

Cycle catchments



3.4 Transport

Community Bus Services VL5 and VL6. The VL5 service runs every Thursday between Carlton, Stevington, Bromham, Turley and Olney. The VL6 service runs on the fourth Tuesday of each month to Milton Keynes.

The nearest bus stops that provide access to regular services are on Northampton Road, to the south of the site. The northbound stop is approximately 315m from the eastern site access and is marked by a flag and pole, a shelter, and a raised boarding kerb. There is an uncontrolled pedestrian crossing with tactile paving and a contrasting road surface providing a safe connection to the shared footway/cycleway on the eastern side of the road. The southbound stop is approximately 535m from the centre of the site and is marked by a flag and pole and raised boarding kerbs. The bus stops serve the 41, A2, and E routes. The 41 service provides an hourly service between Bedford and Northampton Monday to Saturday and three two-way trips on a Sunday. The A2 and E services are operated by Road Runner Community Transport and provide an irregular service to both Milton Keynes, Sainsbury's superstore, and Kempston.

The internal layout of the development will be designed to adoptable standards and to ensure that service vehicles can enter, manoeuvre and exit the site in a forward gear, with the provision of appropriate turning heads.

Off-site traffic impact

The Transport Assessment from the previous planning application calculated that the proposed development would generate approximately 138 two-way trips in the AM peak hour and 119 in the PM peak hour. The Transport Assessment forecast that most of the trips would route to and from the south through the village of Bromham towards the A428 south and the A4280. The following off-site junctions were found to experience material increases in traffic, defined as more than 30 two-way trips:

- A428/Northampton Road priority-controlled ghost island junction
- Northampton Road/Grange Lane priority-controlled T-junction
- Grange Lane/Village Road priority-controlled T-junction
- Northampton Road/Stagsden Road priority-controlled T-junction

The modelling included within the Transport Assessment determined that the site access junctions would operate with plenty of capacity. Adopting a worst case, with all the development traffic routing through it, the Northampton Road site access would operate at 20% of capacity. Under the same conditions, the Grange Lane access junction would operate at 25% of capacity.

With the development in place, the other junctions were forecast to operate at the following levels of capacity:

- A428/Northampton Road junction 26%
- Northampton Road/Grange Lane junction 24%
- Grange Lane/Village Road junction 30%
- Northampton Road/Stagsden Road junction 63%

Therefore, the site access junction could safely accommodate the development traffic and there would not be adverse impact at the off-site junctions because of the development.

A review of the Crashmap database shows that there have been no accidents recorded on Northampton Road or Grange Lane in the vicinity of the site in the past five years. Therefore, there is no accident problem in the vicinity of the site.

Up to date traffic flows and modelling would be required as part of an updated application, but the levels of spare capacity described above would not alter the conclusions of the previous work. The highway network would adequately accommodate the increase in traffic resulting from a development of up to 200 dwellings. There would not be an adverse impact on congestion or road safety.



3.5 Flood Risk and Drainage

A Flood Risk Assessment and Drainage Strategy report was prepared by EAS Ltd in support of the previous planning application. ADC have used the findings to inform their addendum produced for this site promotion document.

A previous Flood Risk Assessment and Drainage Strategy report was prepared in May 2017 to support the previous planning application. The findings of that report have been used to inform this appraisal. The site is within Flood Zone 1, and has a low residual risk of fluvial flooding, and there is also a low risk from pluvial (surface water) and reservoir flooding.



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

The 2014 Bedford Borough Strategic Flood Risk Assessment (SFRA) contains mapping that shows the historic flooding incidents across the Borough areas. Within Bromham, there is a single incident of property flooding within the village, and a second flood event provided from the local Internal Drainage Board records. Both of these incidents occurred close to the River Ouse, which flows to the southeast of the village, and did not impact the site directly. The publicly available Recorded Flood Outlines dataset shows that the Environment Agency has records of four previous flood events to have impacted the wider area, all of which were remote from the site. There are no further incidents of historical flooding associated with Bromham.

There is a low risk of flooding posed to the site and is summarised in the table below.

Flooding Source	Degree of Risk	Source of Risk
Fluvial	Low	The site is within Flood Zone 1 and is at a low risk of flooding from fluvial sources.
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 included within the Bedford Borough SFRA that the local area has a low (<25% susceptibility) to groundwater flooding, which includes the site. 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 currently greenfield and is not served by an existing drainage network. The local SFRA includes details of historic sewer flooding incident, as provided by Anglian Water, this confirms that there no properties at risk of sewer flooding in Bromham, and risk is deemed to be negligible.
Pluvial (Surface water) runoff	Low	The EA flood mapping shows that the majority of the site has a low risk of surface water flooding. The exceptions being an area located in the south-west corner which has medium-high areas of risk, this is associated with a minor watercourse that runs along the south and southwest boundary of the site. There is also an overland flow path that runs parallel to the eastern boundary associated with a minor ditch that follows the natural gradient of the land.
Reservoirs and Waterbodies	None	The EA mapping shows that the site does not falls within an area deemed to be at risk of reservoir flooding.

Surface Water

The site is considered as greenfield and comprises agricultural farmland and it is assumed that surface water either soaks into the ground or runs overland towards the existing land drainage network in the south. The site is roughly split into two drainage catchments with the smaller eastern portion shedding towards the existing drainage ditch in the southeast and the western half towards the boundary ditch in the southwest.

3.5 Flood Risk and Drainage

Discharge options

In accordance with the Building Regulations Part H, the newly published Non-Statutory Technical Standards for SuDS and prevailing best practice, surface water should be discharged according to the following preferential hierarchy:

1. infiltration drainage techniques, such as swales and soakaways
2. an open watercourse, river, or ditch
3. a surface water sewer
4. a combined sewer.

At this stage it is uncertain whether infiltration can be used to manage runoff from the development, even in a limited way. Therefore, preference should be given to the disposal of surface water runoff into the nearest open watercourse or drainage ditch. The minor watercourse that runs near the southwest corner, where the lowest site elevations are located, is the most favourable location for a discharge to be made. The minor ditch along the eastern boundary offers another potential option for a surface water discharge. Further investigation of its route downstream from the site is recommended to confirm the downstream connection to the wider network.

Proposed Surface Water Strategy

In the previous surface water strategy, the site was split into two drainage catchments to reflect the on-site topography, and runoff from each catchment drained into a separate attenuation basin that discharged into the land drainage network, one into the minor watercourse to the southwest, with the other to the drainage ditch along the eastern boundary. In addition to the proposed attenuation basins, a swale feature will be utilised along the southern site boundary to provide additional surface water conveyance, as well as site amenity and water treatment benefits. Additional SuDS features could potentially be incorporated subject to the final layout.

Foul Water Drainage

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

1. a foul water sewer
2. a combined sewer
3. a septic tank

4. a cesspool.

The site is greenfield and has no foul water discharge at present and sewer asset record plans show that there are no adopted foul sewer assets within the site itself. The plans show that there is an easterly flowing foul sewer within Chestnut Avenue to the south-west of the site that discharges into an adopted pumping station at the junction with Northampton Road. From the pumping station, there is a foul water rising main that runs within Northampton Road to south, that outfalls into the foul drainage network at the junction of Grange Lane and Northampton Road.

A Pre-Planning Enquiry was submitted to Anglian Water as part of the previous FRA and Drainage Strategy report. In their formal response, it was confirmed that the local foul water network has the capacity to accept the foul flows generated by the development, and recommended that a connection could be made into manhole 2001 in Grange Lane to the south. A review of the onsite levels shows that it is possible to make a gravity conveyed connection into the adopted foul sewer in Grange Lane, subject to a Section 106 agreement.

It is proposed the foul effluent is conveyed via a gravity network that will serve the development down to a new connection into the adopted Anglian Water at manhole 2001, in line with the previous foul strategy, to be discharged offsite at an unrestricted rate. As a next stage, it is recommended that further consultation is undertaken with Anglian Water to confirm the proposed foul strategy for the site and discuss any further actions that need to be considered.

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.

The site does not contain any designated heritage assets and the previous desk-based assessment (CgMs 2017) confirmed that there were no designated assets outside of the site assessed as sensitive to development within it.

The committee report for the previous planning application (17/01557/MAO) summarises the consultation response from the Archaeological Officer for Bedford Borough Council. He confirmed that the desk-based assessment appeared to satisfactorily identify the known archaeological and heritage constraints both on the site and within the surrounding area. He confirmed that the geophysical survey failed to identify complex below ground archaeological remains indicative of significant settlement activity or buildings, and there were, therefore, no reasons on heritage grounds to preclude the granting of planning permission for the site. He confirmed that intrusive trial trench evaluation could be undertaken post-consent, secured by a suitably-worded condition attached to any planning permission granted. Heritage was not included in the reasons for refusal of the planning permission and was not raised as an issue at the subsequent planning appeal.

Designated Assets

There are no designated heritage assets within the site

There is one Scheduled Monument within the 1km search area; Bromham Bridge (List Entry Number 1005411), located 830m south-east of the study site. The Scheduled Monument is screened from the site by topography and is not sensitive to development within the site.

There are 16 Listed Buildings within the search area, the majority of which are located within the village core of Bromham. None of these buildings are intervisible with the site as they are screened by topography, vegetation or intervening built development. The Listed Buildings within the search area are not sensitive to development on the site.

Non- Designated Assets

The data provided by the HER includes three records within the study site; the conjectured line of a Roman road from Irchester to Kempston (HER 58), a mill pond (HER 2621) and cropmarks indicating a ring ditch with probable entrance, and two linear features, with nearby Roman pottery recorded (HER3125). However, the geophysical survey did not identify complex below ground archaeological remains indicative of significant settlement activity or buildings and consequently the site is considered

to have a low potential for significant, i.e. non-agricultural, remains of all periods. Any such remains are likely to be of local interest and would be significant for their archaeological interest and potential to contribute to regional research agendas.

Geophysics does not identify all archaeological features, but in this instance, the archaeological interest in the site is reduced such that there is little or no possibility that the site contains remains that would require preservation in situ or to be designed around. The heritage interest in the site can therefore be secured by condition.

Bromham Bridge



3.7 Noise and Air Quality

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

In terms of **noise** it confirms that the existing noise climate at the site is dominated by the local highway network. The assessment of the potential impact of noise on the future development is anticipated to show that most of the site can achieve the required criteria without onerous acoustic measures and while there is potential for higher noise levels on the most exposed boundaries, acoustic design options can be considered through 'mitigation by design' measures during the master planning process.

Air Acoustics produced a Noise and Air Quality Assessment in 2017 to support the previous planning application on the site. Although the Environmental Health Officer did not raise objection to the proposals on a traffic noise or air quality impact issues the committee report sets out that a Scout Camp is located on land directly to the north of the site. The Scouting Association had raised concerns that a new housing development on the site, in such close proximity to their operations would curtail some of their activities on site which generate substantial noise at certain periods of the year. The noise assessment at the time did not acknowledge the scouting activities and given the scale of objection to the proposals from the scouts' perspective, a degree of weight was attached to this issue.

In response to this AAC have been made aware of the concern and have made the following points:

- Scouting is a strange activity in that the noise from children playing is exempt from the nuisance legislation. There is a general principle that this noise is part of their development and similar to a baby crying and a playground the specific children's noise cannot be considered as a statutory noise nuisance. The assessment of short-term noise impacts is normally related to commercial plant and activities but as this noise is not commercial in nature, again this guidance is not appropriate. Environmental Health would have to look at potential antisocial behaviour legislation if they had complaints from local residents.
- The scouting activity is based around the core weekly meetings of the various age groups, (beavers, cubs, scouts) and then supplemented with other irregular activities including camps and trips. The Bromham centre is a large site with the scout hut located close to the access road on the opposite side of the site relative to the proposed development and the site benefits from a large external space between the hut and the boundary with the obvious benefits and attraction for external activities. While the site is large in nature the boundaries furthest from the access and Scout hut, (the proposed boundary) will experience the least activity.

- These external activities are impacted by the seasonal weather variation and it is likely that for the vast majority of the time there will be no activity on the site at all or minimal activity that results in no impact. During the autumn, winter and early spring period most activities will be based internally and external activities will be limited. During these periods most residents are also inside so are also less likely to outside to experience impacts. During the dryer and warmer periods, the external area become a major part of the site and the frequency of use will increase as will the external areas of neighbouring residents, and this is considered to represent the main area of concern with regard to potential adverse noise impacts.
- All scouting activities are planned, managed and controlled and leaders ensure reasonable behaviour for the safety and benefit of all, with one of the overriding principles of scouting to show consideration and respect. It is therefore considered extremely unlikely that authorised activity will occur of an anti-social nature or with the frequency and duration required to result in significant short or long-term impacts.
- With regard to other uses such as private camping and caravan use, it is stressed that the Scouts will have specific rules associated with the use of the field which will include details of the site rules which will include behaviour. It is considered that the type of use that would result in significant adverse impacts on neighbouring land would not be not be allowed.

Prior to the submission of a noise report with any future planning application submission, the noise consultants would consult with the Environmental Health Officer and talk to the Scout leaders to ensure that the Scout's concerns are properly understood and comprehensively covered within the full assessment.

In terms of **air quality**, it is acknowledged that the main air quality contribution to the area will be from the local highway network. The lack of local air quality monitoring data in close vicinity of the site indicates that air quality is not a concern for Bedford Borough Council in this area.



3.8 Agricultural Land Classification

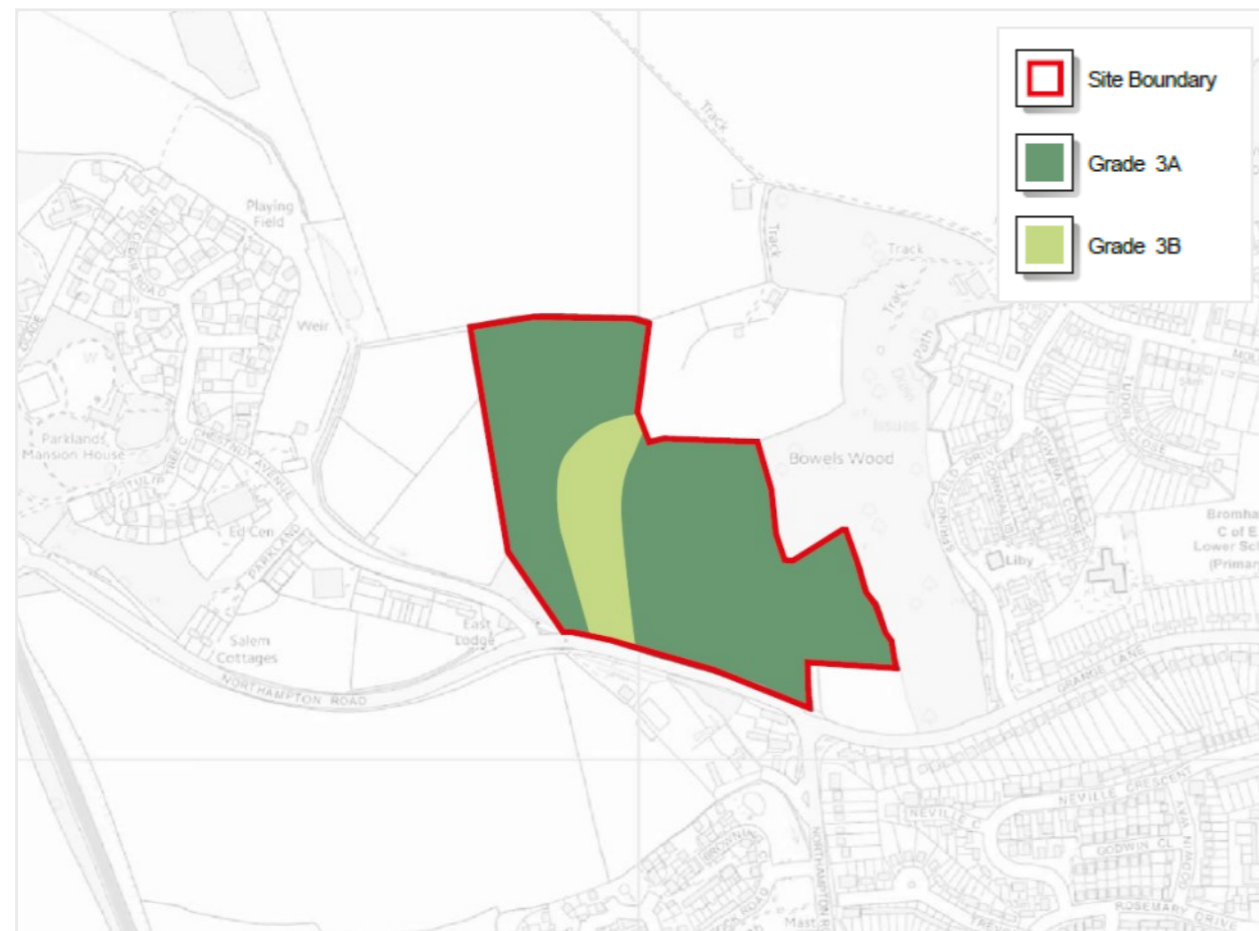
Waterman Infrastructure & Environmental provided an assessment of the agricultural quality and versatility of the site in order to support the previous planning application. Key points can be summarised as follows:

The Site

Land within the Site is gently to moderately sloping, with a band of strongly sloping land across the middle of the site. The gradient of the strongly sloping land is sufficient to limit the land to ALC Grade 3b. Flood risk is not considered to impose any ALC Grade limitation within the Site. Detailed survey of the site found all the agricultural land in ALC Grades 3a and 3b.

All soil profiles found within the site are broadly similar, being heavy textured and calcareous. To the west the soil is subject to slight seasonal waterlogging (Wetness Class II) and is limited to Grade 3a by soil droughtiness. To the east the slowly permeable subsoil is found closer to the surface and the profile is seasonally waterlogged (Wetness Class III) and is limited to Grade 3a by soil wetness.

ALC Classification



3.8 Agricultural Land Classification

ALC Grade	Area	(ha)* %
3a	8.8	83
3b	1.8	17
Total	10.6	100.0

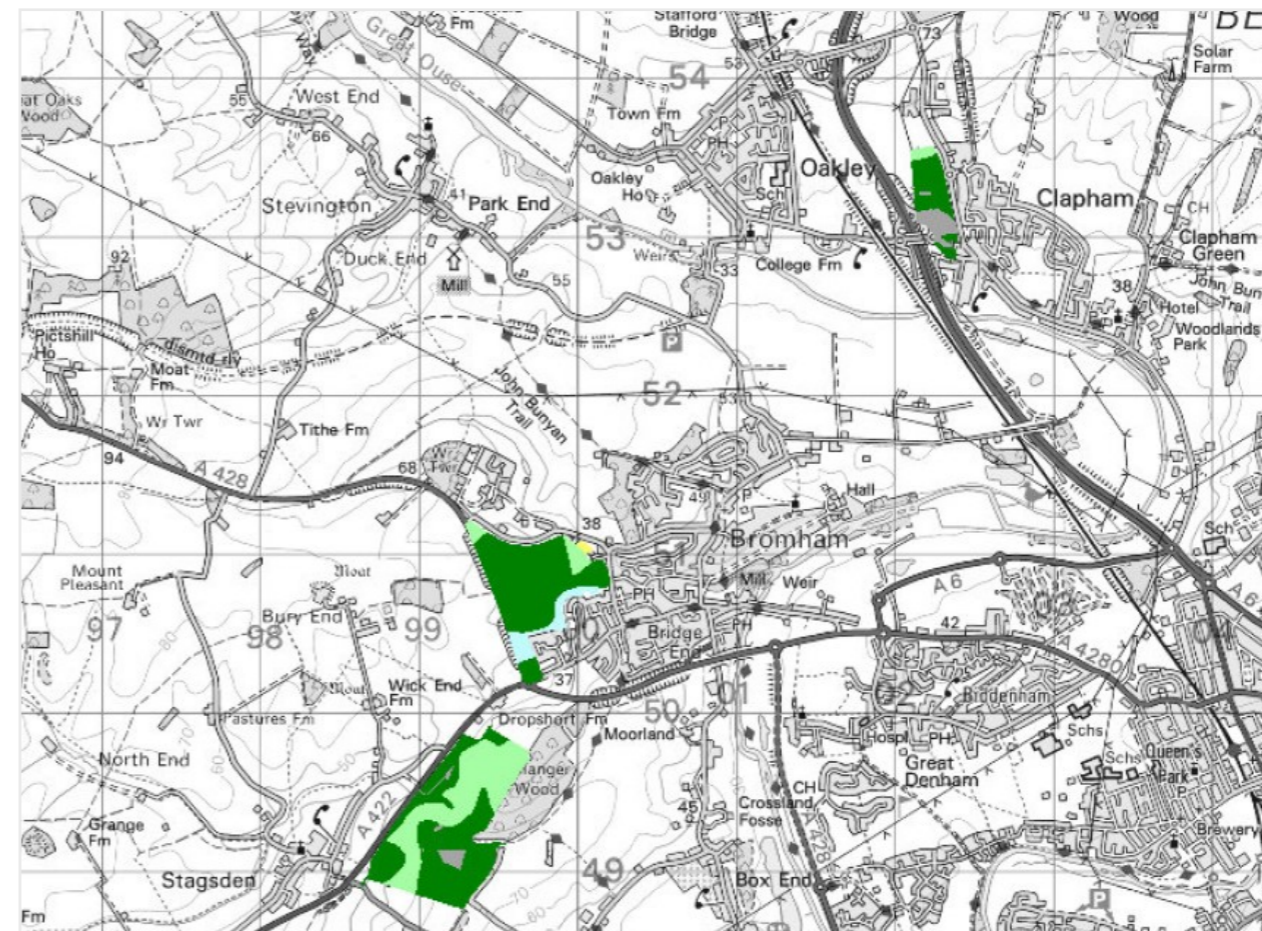
The central band of Grade 3b is the strongly sloping land, limited to Grade by gradient. This gradient limitation results from restrictions on land management options such as choice of machinery for safe arable land work. It only applies to the strongly sloping land but for all practical intents and purposes, the presence of this strongly sloping land will limit arable land management options for the whole field.

The extent of Agricultural Land Classifications in the Bedford area is identified below. The map details that the typical ALC grade in the area as Grade 3a and 3b, with some Grade 1 and Grade 2 classifications. An area immediately south of the Site has been classified primarily as Grade 3a with two small pockets of Grade 3b and a large section of Grade 2 at the south of the Site. Two other classifications to the north and northeast of the Site have also classified most the land as Grade 3a. Therefore, it is considered that the Site's classification as a Grade 3a and Grade 3b is reflective of the surrounding area, consequently allocating the Site for development would not result in a significant loss in the best and most versatile land in the context of the wider agricultural resource.

The Council has previously accepted the findings of the ALC survey but cited loss of agricultural land as a reason for refusal based on the fact that at the time of decision (2017) there was no policy demand for residential development and as such the proposals would have resulted in the loss of agricultural land that is largely within the best and most versatile category and therefore contrary to the NPPF and policy CP2 of the adopted plan.

Clearly, as set out within earlier sections of this document, circumstances have changed and the Council needs to allocate additional land to meet their housing targets.

Bromham Agricultural Land Classifications



A large, stylized red brushstroke graphic that forms a partial circle on the left side of the page. The stroke is thick and has a textured, hand-painted appearance with visible bristles and varying shades of red.

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

- The eastern site boundary is defined by Bowels Wood, an Ancient Woodland. Appropriate buffers (15 metres) to avoid impact on the trees will be maintained;
- Proximity of an existing pump station close to the south western corner of the site;
- Existing electricity sub-station by Northampton Road;
- Overhead electric lines (which would be diverted as part of the development);
- Watercourse in south-western corner;
- Existing public right of way beyond the eastern boundary along Springfield Drive and;
- Topography of the site located on a south facing slope. The highest point is within the north-eastern corner at approximately 56m AOD falling approximately 18m to the south western boundary that lies at approximately 38m AOD.

Opportunities

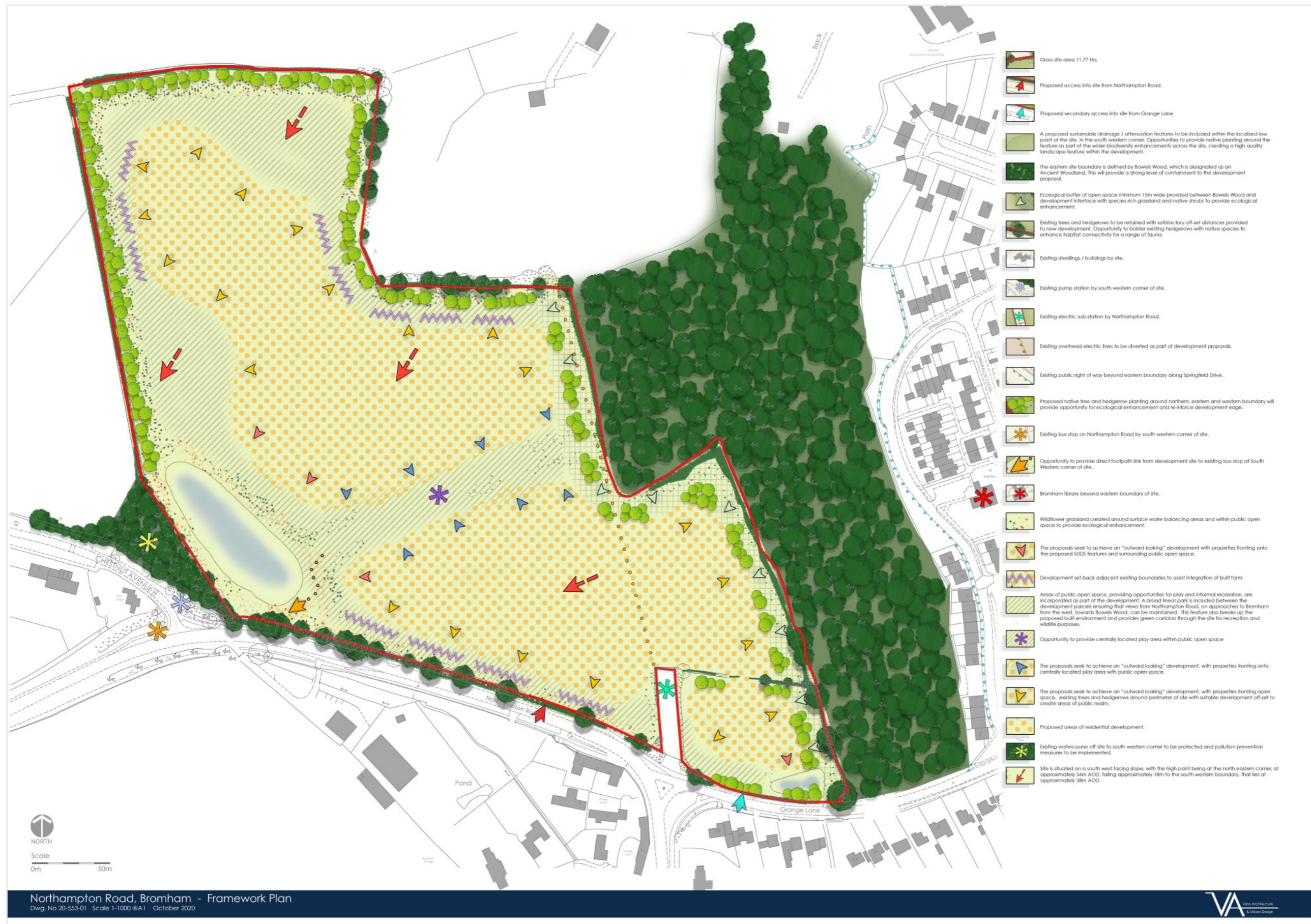
- Circa 250 high quality dwellings can be delivered with a mix of types and sizes to meet local need;
- Development could enable a secondary access from Grange Lane to improve connectivity through the site;
 - The proposals will incorporate areas of public open space providing opportunities for play and informal recreation. A broad linear park is included between development parcels ensuring that views from Northampton Road, on approaches from Bromham to the west, towards Bowels Wood, can be maintained. This approach breaks up the built form on site and provides green corridors through for recreation and wildlife;
 - The creation of sustainable drainage/attenuation features to be provided within the low point of the site in the south west corner. Opportunities to provide native planting around the feature as part of the wider biodiversity enhancements across the site which would also result in a high quality landscaped feature;
 - The required 15 m buffer from the edge of Bowels Wood would act as an ecological open space and planted with species rich grassland and native shrubs to provide ecological enhancements;
 - Existing trees and hedgerows will be retained where possible with necessary off-set

distances to new development. Opportunities will be taken to bolster existing hedgerows with native species to enhance habitat connectivity for a range of fauna;

- Wildflower grassland will be created around the surface water balancing areas and within areas of public open space to provide ecological enhancement;
 - Development will face onto the proposed SUDS, areas of public open space and children's play area to allow natural surveillance.;
- A new equipped children's play area can be located within a substantial area of public open space which will feature wildlife enhancements and an area of preserved ridge and furrow which would be appropriately located and signposted to increase public awareness and access;
 - Creation of an enhanced and defensible edge to the settlement to the north and east, enhancing the village edge and entrance;
 - Enhanced degree of separation from the wider landscape setting to the north;
 - The proposals will achieve an outward looking development with properties fronting onto the site boundaries, retained soft landscaping assets and the proposed streets. The outward looking facing properties will create an active and attractive frontage to the development and also provide passive surveillance to the public open space within the development;
 - New footpath link to Lower Farm Road from the site;
 - Sustainable drainage/attenuation feature which will provide additional opportunities for biodiversity enhancement and high-quality entrance to the site and;
 - Potential to provide new 1.2m wide footway along the southern side of Lower Farm Road to improve the connectivity from the site into the village.

Key considerations during the design process has been to assimilate the proposals into the surroundings and to take full account of the proximity of the site to the adjoining Ancient Woodland. As such the Framework Plan has been guided by the Arboricultural, Ecology and Landscape and Visual Assessments undertaken in particular.

4.0 Framework Plan





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 references 55/412, as one of a number of sites around Bromham.

The Strategic Housing and Employment Land Availability Assessment in December 2018 concluded that the site is suitable, available and achievable.

The site is suitable for development – outside of settlement boundary but located adjacent to the edge of Bromham which is identified as a Key Service Centre and where the adopted local plan directs 500 dwellings to over the plan period. The site is within close proximity to public transport route, services and facilities and adjacent to residential uses.

The site is available for development – site has previously been promoted with no known constraints to development. The development of the site will make a valuable contribution to Bedford Borough's housing land supply and deliver much needed market and affordable housing in the District.

The development of the site is the achievable – once allocated, there is a realistic prospect of development being delivered within 5 years. The principle would be established. All necessary supporting reports have been undertaken. It is realistic to assume that a detailed scheme could be drawn up and determined by the Council within a year, which leaves plenty of time to discharge relevant conditions and commence work on site.

Appendix 4. Sites which are suitable, available and achievable

*In Key Service Centres identified for growth, site capacities are capped at 500. In Rural Service Centres identified for growth, site capacities are capped at 50.

Site reference	Address	Parish / Ward	Source	Capacity*	Delivery
412	Grange Farm, Northampton Road	Bromham / Bromham and Biddenham	Call for sites	250	1-5 years



Conclusion

6.0 Conclusion

This promotional document has been prepared on behalf of Kler Group Ltd. in respect of land at Northampton Road, 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 P1 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 Northampton Road as a consequence of Bromham containing a wide range of shops, services and facilities commensurate with its position in the current settlement hierarchy identified as a Key Service Centre

Based on the previous call for sites exercise, there are a range of sites available at Bromham to meet a planned strategy which seeks to allocate land at this Key Service Centre.

In order to support the Council's approach proposing to allocate the site at Northampton Road 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 11.7 hectare site could deliver approximately 250 houses, whilst having regard to the above mitigatory measures whilst also deploying the following design and layout principles;

- Active, "outward facing" development;
- Retained hedgerows to be bolstered with native species to increase biodiversity;
- Respect to the adjacent Ancient Woodland in terms of providing appropriate buffer
- Creation of new habitat for wildlife including woodland, scrubland and species rich wildflower grassland,
- Substantial area of public opens space with a linear park connecting development parcels ensuring views through the site from the road can be maintained as well as providing children's play and wildlife corridors.
- Sustainable drainage features.

In summary, therefore, Kler Group Ltd. would support the Councils approach to allocating the site at Northampton Road, Bromham.

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