



Vision Statement



Lower Farm Road
Bromham
Kler Group Limited

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Introduction

1.1 Executive Summary

Cerda Planning has been engaged by Kler Group Ltd. to promote land at Lower Farm 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 Lower Farm 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.

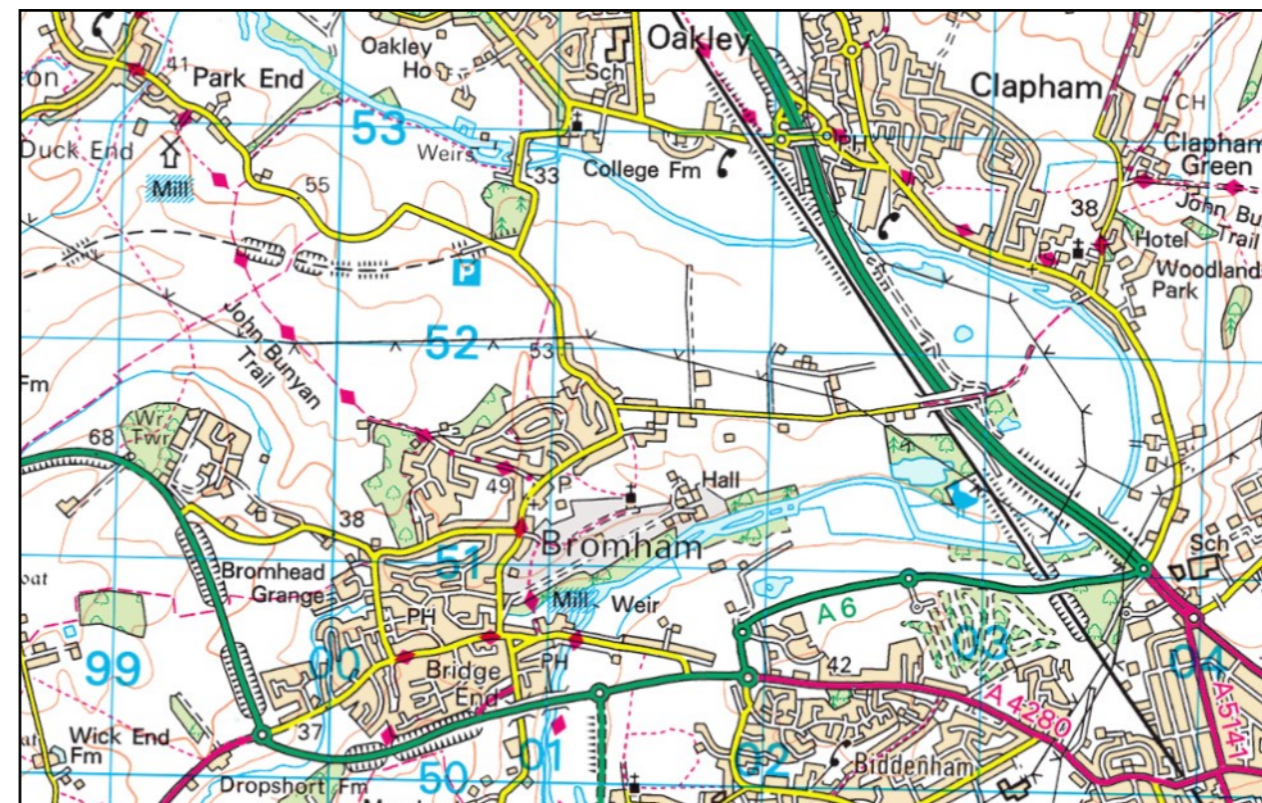
The promotional document is therefore submitted outside of any formal consultation process so as to assist the Council in considering the merits of allocating the site, as set out later in the document, could deliver in the order of 75 houses in the first phase of the new plan period.

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.



● Location of Site in Bedford

Ordnance Survey Map of site location



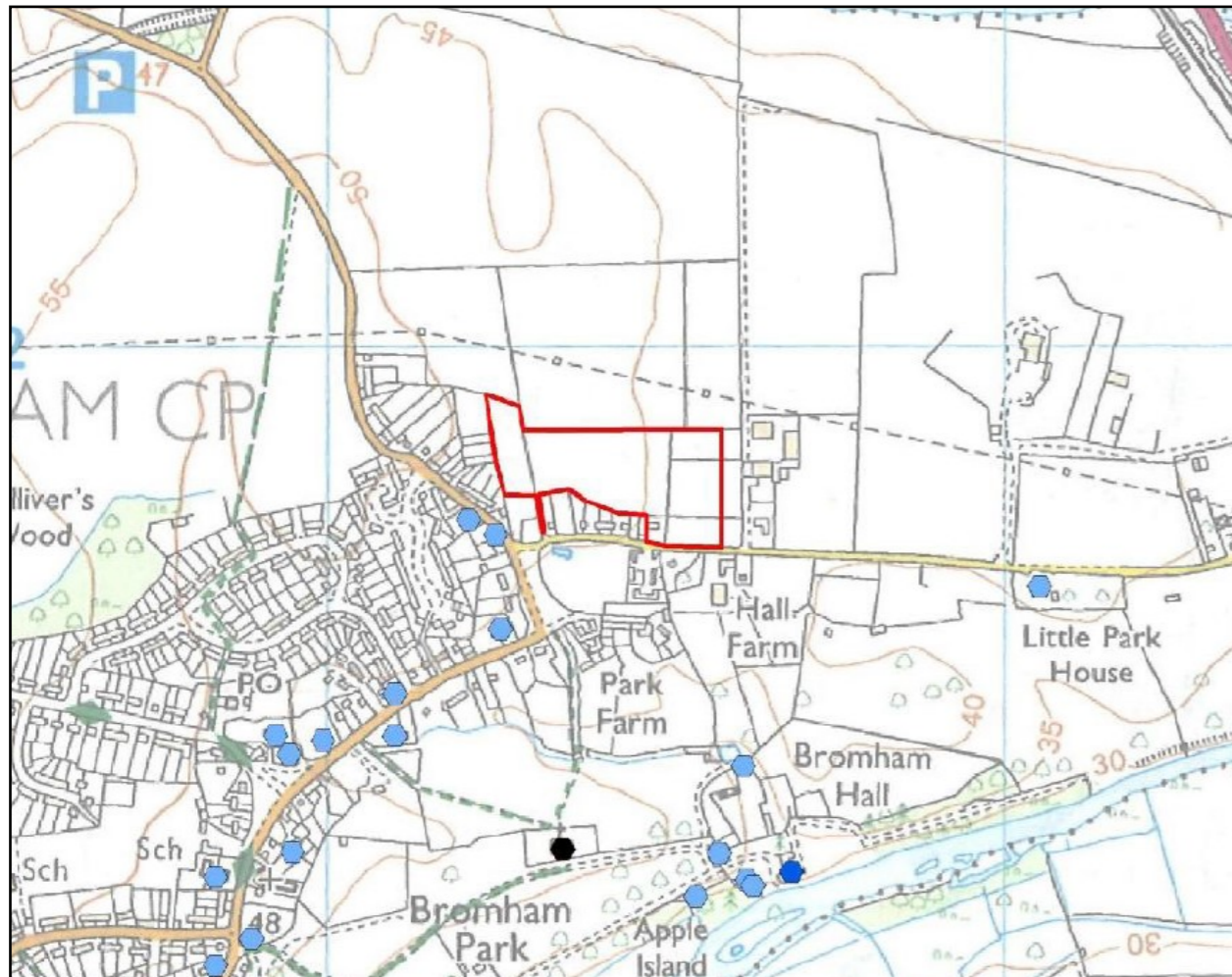
1.2 Site Location

The site, is roughly rectangular in shape extends to approximately to 4.44 hectares and is located on the north-eastern edge of Bromham, directly to the north of rear gardens of houses at 5-31 Lower Farm Road and Home Grove and to the east of adjoining farm house. Houses exist on the opposite side of Lower Farm Road and within a small cul-de-sac, Stewart Close.

The site is currently agricultural land used to graze horses and cattle. The site is relatively flat and open. Trees and hedgerows enclose the site.

The site does not contain any other notable features or buildings, and is unconstrained in terms of heritage, technical or environmental matters in the context of a potential residential development.

Lower Farm Road site boundary



Photograph of the site

Established residential development is located directly beyond the southern and western boundaries within Lower Farm Road and Oakley Road. A new agricultural workers dwelling has recently been constructed to the east of the site which is accessed from the main entrance into the farm off Lower Farm Road. Stewart Close is a short cul-de-sac which was constructed in the late 1990's is a spur off the opposite side of Lower Farm Road, opposite the houses directly backing onto the application site.

The adjoining residential houses contains a mixture of house types, the majority of which are 2 storey and appear to date from the 1950's to recent day.

1.3 Planning History

Planning permission was refused in January 2017 for an outline application with all matters reserved except for access for a residential development of up to 93 dwellings and associated works for the following reasons:

1. The proposal would result in residential property inappropriately located in open countryside;
2. The proposed development would result in built up development within an area of open countryside, thereby eroding the open, rural character of this area and which would be out of character with the existing linear grain of the development in the immediate vicinity;
3. Insufficient information has been submitted to enable the Local Planning Authority to assess the likely impact of the development on the potential loss of best and most versatile agricultural land;
4. The proposal would fail to secure and make adequate provision for affordable housing on the site;
5. The proposed development would fail to secure and make adequate provision for on-site play and informal/amenity green space;
6. The proposed development would result in an unacceptable loss of ridge and furrow earthworks which would result in the loss of significance of a non-designated heritage asset.

All contrary to the National Planning Policy Framework, saved policies of the Bedford Local Plan 2002 and the Bedford Borough Core Strategy and Rural Issues Plan 2008.

The refusal was subsequently appealed under reference APP/K0235/W/17/3167566.

The Inspector dealing with the appeal considered the main issues to be whether the site is a suitable location for residential development having regard to planning policy; whether the Council could demonstrate a deliverable five year housing land supply; the effect on the character and appearance of the area; whether and to what extent best and most versatile agricultural land would be affected and the extent to which ridge and furrow, a non-designated heritage asset, would be affected.

In terms of planning policy, he stated:

"it seems to me that the proposal would only receive policy support in the event that a proven need for residential development exists within the RPA."

He also concluded that at the time of the Inquiry the Council could demonstrate a 5.71 years' housing land supply and as such its policies for the supply of housing were not out of date.

In relation to the effect on character and appearance the Inspector found no conflict with relevant policies which required that regard be had to the visual impacts of the development, site context or local distinctiveness. He considered that landscape and visual impacts would be limited and localised and in his view the development "would sit comfortably as a logical extension of the settlement."

He also confirmed that in terms of Agricultural Land Classification, the site is grade 3b and not classified as best and most versatile and therefore the proposals do not conflict with policy CP2.

With regard to ridge and furrow the Inspector considered that whilst a small area of it would have been retained within the proposed area of public open space, this would be limited and would represent a small fragmented part of the existing asset. Given that most of the ridge and furrow earthworks would have been lost which amounted to substantial harm, it was accepted that the harm should be weighted in the planning balance. As it was agreed by all parties that the asset is of no more than high local-low regional significance, the weight in the planning balance can be moderated to moderate.

The penultimate paragraph of the appeal decision states:

"The proposal is in conflict with the fundamental strategy and objectives of the development plan and is not in an appropriate location at this time. Whilst I have not found harm in relation to character and appearance or best and most versatile agricultural land, the substantial harm that I have found to a non-designated heritage asset also weighs against the proposal and is in conflict with the objectives of the Framework. I have had regard to the material considerations in favour of the development but these do not alter or outweigh the conflict with the development plan in this case and the harms that I have identified."

The appeal decision is highly material insofar as it demonstrates a lack of any technical or environmental constraint to the bringing forward of the site. The appeal turned on the need or otherwise for housing at that time. The review to the Local Plan is being advanced precisely because there is a need to plan for more housing. Prima facie the appeal dismissal might indicate an issue with allocating the site but the detail demonstrates the appropriateness of the site for housing.



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 Emerging 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 year 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.

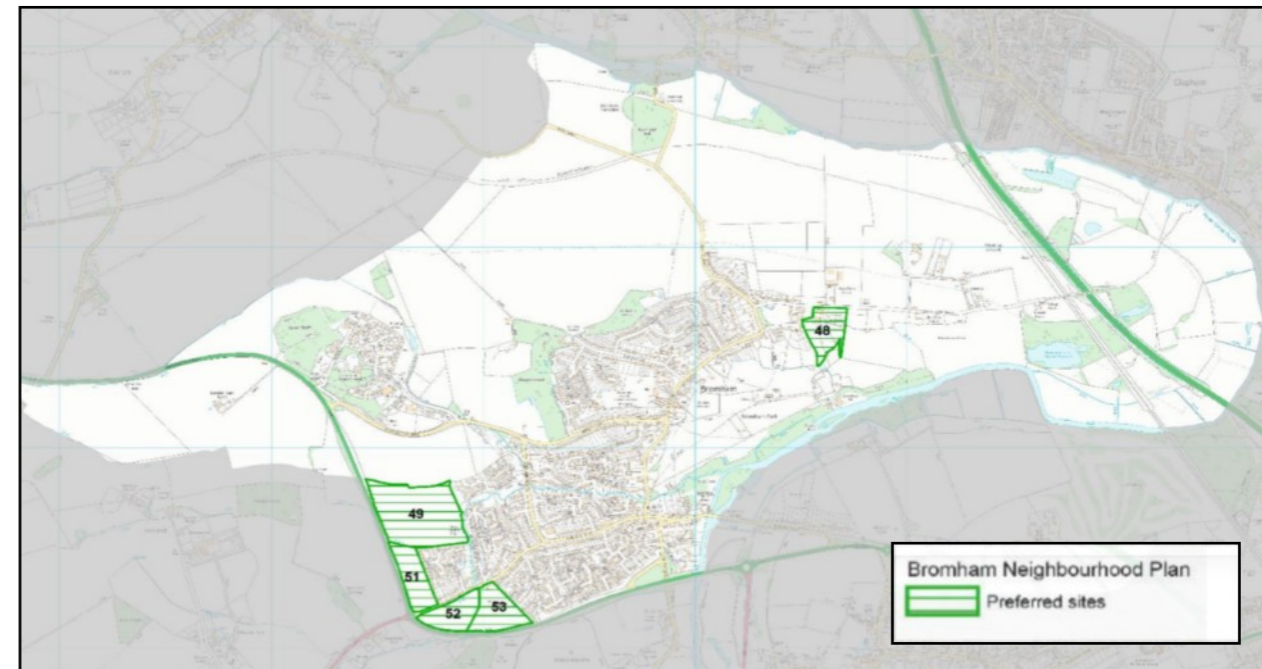
Emerging Policy HA1 states " provided that the development sites meet the requirements set out in other parts of this plan, and of Bedford Borough Council's strategic priorities at the time of any planning application, the three sites set out and shown in Map 2 should be allocated for development."

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

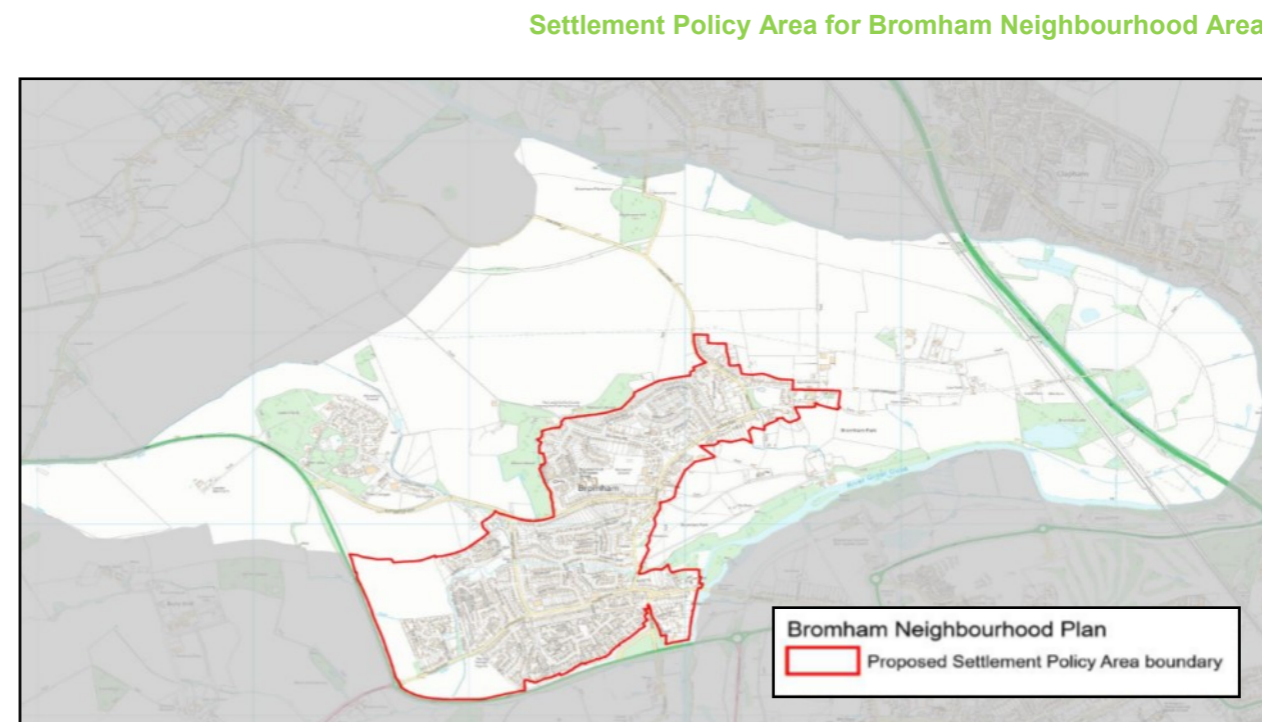
These allocations will create the Settlement Policy Area as illustrated.

Emerging policies H1 and H2 deal with affordable housing and require 30% on site if viable in accordance with the adopted Local 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 Lower Farm Road was unsuitable for



Locations of the Allocated Sites



Settlement Policy Area for Bromham Neighbourhood Area

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.

Appeal Decision

The site at Lower Farm Road, Bromham had previously been put forward for residential development for up to 93 houses in an earlier outline planning application (ref.16/02255/MAO) which was refused by the Council in January 2017, and an appeal (APP/K0235/W/17/3167566) lodged against the decision was dismissed in October 2017.

In his determination of the appeal, the Inspector considered that the main issues were as follows:

1. whether the site was a suitable location for residential development having regard to planning policy;
2. whether the Council could demonstrate a deliverable 5-year housing land supply;
3. the effect on the character and appearance of the area;
4. whether and to what extent best and most versatile agricultural land would be affected, and
5. the extent to which ridge and furrow, a non-designated heritage asset, would be affected.

With regard to the first point, *suitable location*, the Inspector acknowledged that Bromham was a key centre located in the Rural Policy Area where most new development would be focussed in or around

the edge of the key service centres. Notwithstanding that the site lies within the open countryside, it does adjoin the defined Settlement Policy Area for the village, and the Inspector acknowledged that there would be policy support for new development in the Rural Policy Area if there was a proven need for such, one scenario for which would be if the Council could not demonstrate a deliverable, 5-year housing land supply.

It is factually correct that the Bedford Borough Local Plan 2030 requires 500 new homes to be delivered at Bromham and, if the draft Bromham Neighbourhood Plan allocated and subsequently delivered sites to meet the 500 homes requirement, it would in principle be in conformity with the Bedford Borough Local Plan 2030. However this will not meet the requirements of the Local Plan Review.

1. 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 Lower Farm Road site (‘call for sites’ reference 44/54/414), states that the site is technically suitable for development, is available and deliverable and that residents were in favour of the site, despite an increase in traffic through the village. However, the overall assessment was that ‘it was ‘not a preferred site’ and, as such, was not one of those allocated as a new housing site in the draft Plan.

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 Lower Farm Road, Bromham is a site that has been tested in great detail by Council through the submission of an outline planning application in 2016, and independently scrutinised on appeal in 2017, and further updated in each of the separate sections of this document, the assessments being highly material up-to-date considerations.

2.3 Site Assessment

2. Housing Land Supply

In relation to the second point, *housing land supply*, the Inspector concluded that, at the time of the appeal, the Council could demonstrate a 5.71 year housing land supply. Today, using the most up-to-date figure available from April 2019, the Council advises that it can now show a 5.75 years land supply. This is set against the locally derived housing target set out within the Bedford Local Plan 2030; prior to the Local Plan 2030 being adopted the housing land supply position was assessed against the standard methodology which, at that time, indicated a shortfall against the 5 year requirement.

At this early stage, Bedford Borough have not identified the strategy for delivering what amounts to an approximate 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.

3. Character and appearance

With regard to the third point, *character and appearance*, the Inspector acknowledged the open and agricultural nature of the land, but that there was agreement between the parties that the landscape and visual effects of the development would be localised, and that there would be no long distance views that would be affected, nor would there be any impacts upon the wider landscape character area.

The Landscape and Visual Impact Assessment carried out at that time has been revisited as part of this current analysis, further supported through the Arboricultural Assessment that has been undertaken. Once again, the LVIA 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 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 through the development of the site would be limited and localised.

4. Agricultural land classification

Inspector dealing with the appeal concluded that, based upon the available evidence, the ALC of the site was 3b and not, therefore, the 'best and most versatile' agricultural land and did not conflict with development plan policy nor the guidance in the NPPF relating to the scarce resources of such land.

5. Ridge and Furrow

the Inspector acknowledged the presence of this non-designated heritage asset within the site which had moderate and good preservation in various parts of the site, and that any development would inevitably affect it. In support of this document, the significance of this heritage asset has been revisited and the conclusion that has been reached is that, once the housing needs case is established, the significance of the earthwork ridge and furrow within the site would not, in itself, be a reason for refusal and, therefore, trenching could be undertaken to formally establish the extent and significance of this feature.

Other Technical matters

With regard to traffic impact issues, the Inspector was sufficiently satisfied on this issue as to not need to assess what harms might arise in transportation terms, let alone what mitigation might be appropriate. A dedicated section to highways and transportation matters is set out later in this document.

From the various reports that have been prepared for the site and as considered in the relevant sections of this document, it can be seen that there are no over-riding technical, environmental issues or concerns in relation to ground conditions, drainage, flooding or any impact upon noise and air quality or highways that, with appropriate mitigation measures, would diminish the future development potential of the site in question. The site in question is sustainable, available, and deliverable.

It is noteworthy that, in concluding upon the 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.



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.

There are no Tree Preservation Orders on trees within the site but a single Beech (tree 7) and 2 Ash trees (trees 7 and 8) in third party control are afforded protection by TPO 14/94. They are located on land bounding the unmade trackway serving the site from the south; they are of moderate quality commensurate with category B.

The principal trees within influence of the site are 2 veteran trees close to the site's eastern boundary. They are defined within the NPPF as "irreplaceable" wherein there is a presumption against development resulting in their loss. Neither tree will be exposed to risk owing to their separation from the site.

There are no protected, veteran or high quality trees within the site. Those that are readily distinguishable as moderate quality examples are located within field boundary hedgerow and will be retained.

It is envisaged that some low quality tree and hedgerow will be lost to accommodate new development on site but it is realistically likely that the risk to the existing trees can be managed in the trees interest or even improve. The low number of trees provides a real opportunity for enhancing extant tree stock in terms of canopy coverage and distribution.

A well designed development could increase both an increased quantum of large canopy bearing species within open space areas alongside domestic scale coverage within residential parcels where space is more constrained.



Extract from preliminary arboricultural appraisal (west)

Veteran English Oaks on the east of the site



3.2 Ecology and Biodiversity

Aspect Ecology as undertaken a desk study and Phase 1 Habitat survey on the site in order to inform this document.

Ecological Designations

Constraint Low

Notes Statutory Designations The site itself is not subject to any statutory ecological designations. The nearest statutory designation is Bromham Lake Local Nature Reserve (LNR) located approximately 0.9km to the east of the site. Bromham Lake LNR is designated for comprising 25 acres of former mineral workings and is dominated by wetland with a mosaic of grassland, woodland, limestone cliff and wildflower meadow. The next nearest statutory designation is Biddenham Pit Site of Special Scientific Interest (SSSI) located approximately 1km south-east which is designated for geological interest. The site is not located within any SSSI Impact Risk Zones (IRZ).

Non-statutory Designations The site itself is not subject to any non-statutory ecological designations. The nearest non-statutory designation is Molliver's Wood County Wildlife Site (CWS) located approximately 0.5km to the west of the site. The CWS is a 2.9ha seminatural mixed broadleaved woodland with a species-rich understorey. The next nearest non-statutory designation is Bromham Park CWS located approximately 0.6km to the south and is designated for the presence of marshy grassland and an area of broadleaved mixed woodland.

Habitats

Constraint Low

The site comprises five cut and grazed grassland fields. At the time of survey, two fields located to the south-east and west of the site were recently cut to a short height (~10cm), the horse grazed fields located to the centre and eastern boundary of the site had variable sward heights (5cm-50cm), and a cattle grazed field, located at the north-east of the site had a uniformly short sward (5cm). The larger field situated in the centre of the site contains species poor semi-improved grassland. The remaining grassland fields comprise species-poor improved grassland. A total of six hedgerows demarcate the field boundaries within the site, all of which are likely to qualify as a Priority Habitat, although none are likely to qualify as ecologically 'important' under the Hedgerows Regulations 1997. In addition, three of the hedgerows are likely to qualify as species-rich. All the hedgerows within the site are important ecological features of value at the local level. Within and bounding the site are a number of trees largely associated with the hedgerows with two large mature Oak trees located off-site to the east of the site boundary. The semi improved grassland, small areas of dense scrub and tall ruderal vegetation, do not form important ecological features and are not considered to be of importance beyond the context of the site.

Fauna

Constraint Moderate

Bats – Bat activity surveys of the site, as well as emergence and re-entry surveys of a single residential building (B1) within the site boundary were undertaken by a 3rd party consultancy in 2015. Of these, the emergence and re-entry surveys recorded a single emergence and re-entry by a Common Pipistrelle, thereby confirming building B1 as a day roost, a roost of low conservation significance. The 2020 confirms that building B1 remains present. Two Oak trees (T1 and T32), located offsite, adjacent to the south-east and north-east corners of the site boundary are of high and moderate potential to support roosting bats respectively. Bat activity surveys undertaken by a 3rd party consultancy in 2015 identified at least six species of bat (Common Pipistrelle, Soprano Pipistrelle, Serotine, Noctule, Myotis and Long-eared Bats) utilising the site for commuting and foraging purposes. The hedgerows and western-most field were identified as habitat relatively frequently used by both Common and Soprano Pipistrelle.

Badger – no Badger setts were recorded within the site although evidence of Badger in the form of well-worn paths was recorded within the site. Several records from BRMC were returned for the surrounding area. The grassland within the site provides a foraging resource for local Badger. It is therefore likely that Badger utilise the site for commuting and foraging.

Great Crested Newt – GCN surveys of the off-site pond located approximately 60m to the south of the site were undertaken in 2015 by a third party consultancy and recorded a medium size breeding population of GCN. Suitable terrestrial habitat is present within the site for GCN in the form of hedgerows, scrub, rough grassland and brash piles. The off-site pond is separated from the site by a minor road and a line of residential properties, which represent a partial barrier to GCN dispersal. Nonetheless, GCN may potentially utilise the terrestrial habitat within the site.

Reptiles – the taller sward grassland, hedgerows and brash piles provide suitable habitat for reptiles. Information returned from BRMC included records of common reptiles from within the local area. Reptiles may therefore utilise the site.

Birds – several species of common bird were recorded within the site boundary including Green Woodpecker, Blackbird, Starling (Priority Species and Red List), Wood Pigeon and Jackdaw. Information received from BRMC 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. The site offers foraging and nesting habitat for local birds.

3.2 Ecology and Biodiversity

Recommended Further Survey Work, Constraints and Mitigation Requirements

Habitats - The hedgerows 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.

Bats - A summer day roost for a low number of Common Pipistrelle of low conservation significance was recorded in 2015 within building B1, located at the south of the site. Two off-site Oak trees (T1 & T32) have a high and moderate potential to support roosting bats respectively. The network of hedgerows within the site provide habitat for a range of foraging and commuting bats.

Should the residential building (B1) with previous records for roosting bats be required to be removed to facilitate the proposals, then further survey effort in the form of dusk emergence / dawn re-entry surveys would be required to establish their current use by roosting bats. Should the building be confirmed as still providing a roost for bats, then a Natural England licence would be required to enable sensitive demolition. As the previous bat activity surveys are now over five years old, and given that a future scheme design would potentially result in the loss of hedgerows or hedgerow sections, it is recommended that update bat activity surveys (comprising manual walked activity and static monitoring) be undertaken to establish the current use of the site by foraging and commuting bats. Bat activity surveys can be undertaken between April – October. The scope of the bat activity surveys should ideally be agreed with the LPA Ecologist. Light-spill from any future lighting scheme onto retained and newly created habitat, in particular the retained hedgerows and off-site trees should be minimised / avoided.

Badger - It is recommended that an update walkover of the site be conducted prior to development to confirm Badger setts remain absent from the site. If Badgers continue to be absent from the site then all

that is likely to be required is the implementation of best practice safeguards during construction.

Great Crested Newt - Although no breeding habitat is present within the site, the majority of the site comprises livestock grazed pasture, which provides suitable terrestrial habitat for amphibians. One pond with suitability to support breeding Great Crested Newt is present within 250m of the site (located approximately 60m to the south of the site). A medium population of breeding GCN was confirmed to be present within this pond during surveys carried out by a 3rd party consultancy in 2015. It is therefore recommended that an update Great Crested Newt survey is undertaken prior to a planning application submission.

Reptiles - The majority of the site comprises livestock grazed pasture, which provides suitable terrestrial habitat for reptiles. Therefore, it is recommended that a reptile presence / likely absence survey is carried out.

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. wooded areas and hedgerows) should be undertaken outside the bird-nesting season (1st March to 31st August inclusive) if practicable, or else be supervised by a competent ecologist.



3.2 Ecology and Biodiversity

Opportunities & Enhancements

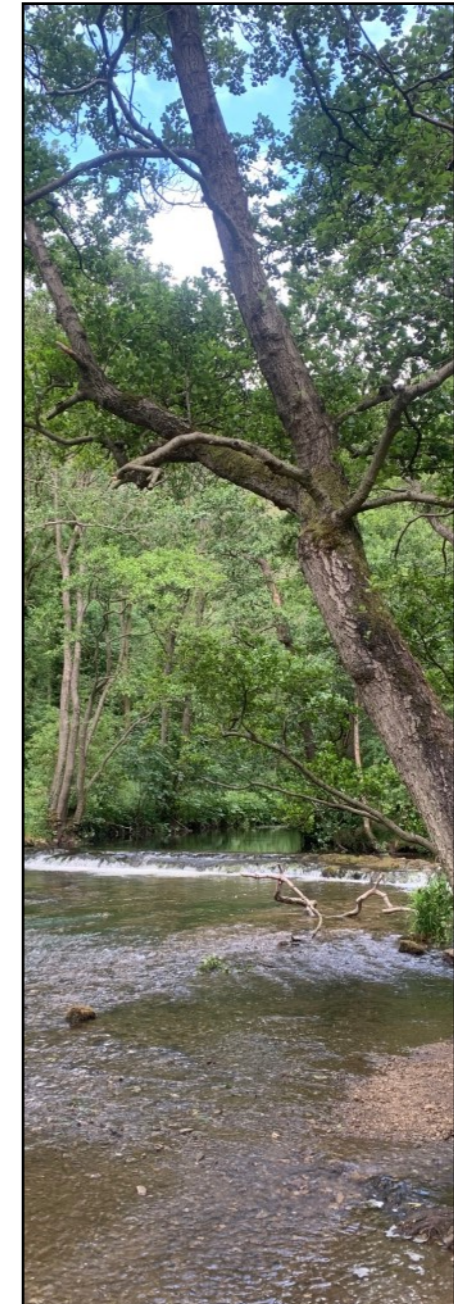
Habitat creation / enhancement – the development of the site provides the opportunity to enhance existing habitat as well as create new habitat of greater value to wildlife. An ecologically guided management plan should be implemented in order to maximise the biodiversity value of the habitats and features retained by the scheme. Sensitive management of woodland, wetland, and hedgerows would provide the most benefit. 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 onsite 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. 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 – can be enhanced by providing improvements to existing habitat connectivity features and by the creation of new connections, e.g. the creation of a new species-rich hedgerow along the southern and eastern boundary would be of particular benefit.

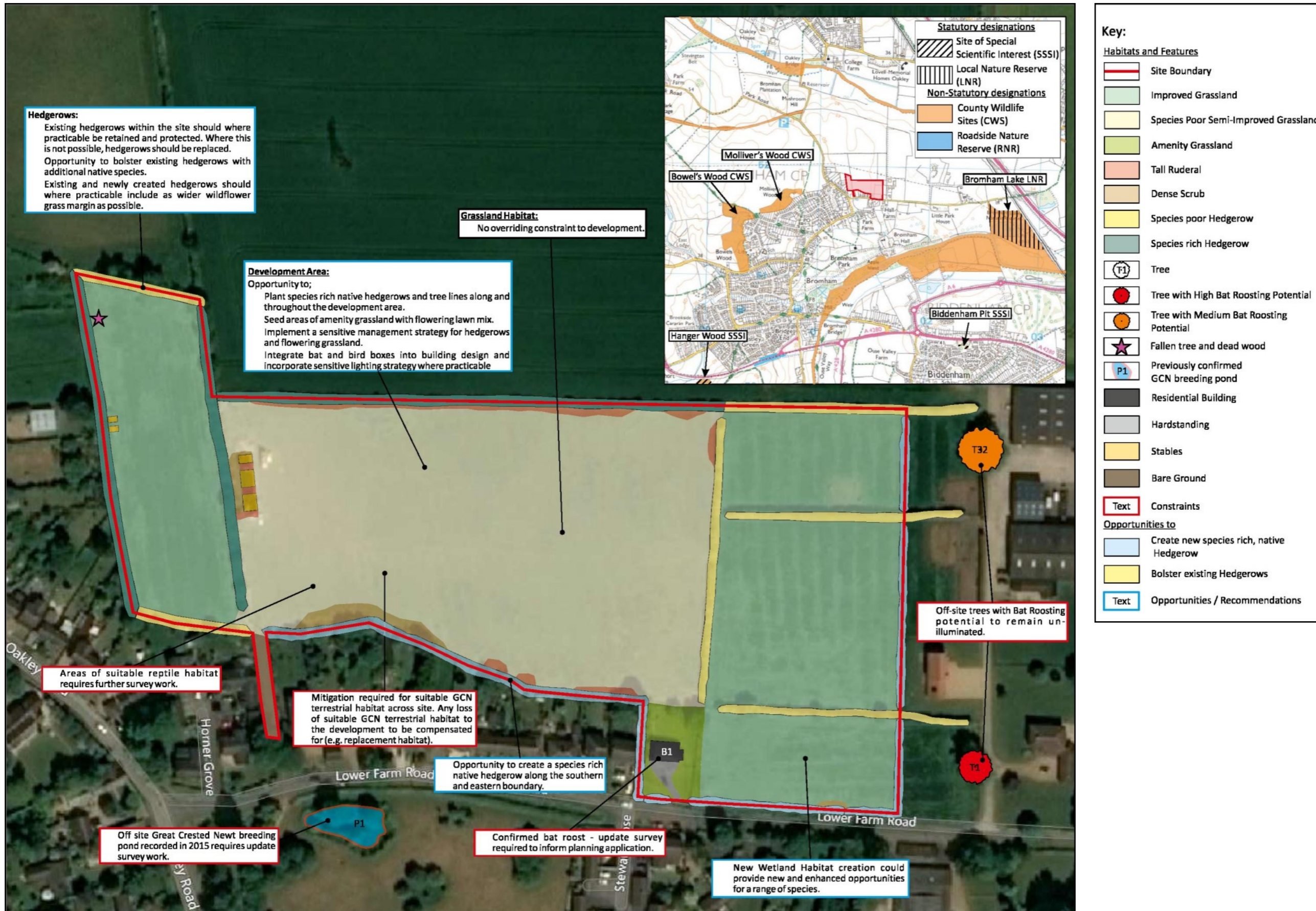
Bats – the habitat creation and enhancements described above will increase foraging and commuting opportunities for local bats. Additional opportunities for roosting bats could be provided through the provision of a range of bat boxes for a variety of species as well as for summer and winter roosting. 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.



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.

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 application and subsequent appeal.

During the appeal the Council agreed that the proposals would not cause harm to the wider landscape character of the area or long distance views and the Inspector concluded:

".....the development would result in the introduction of built form to a currently undeveloped area of countryside that has some intrinsic character and beauty. In this regard, there is some conflict with Policy CP13 of the CS which seeks to prevent development in the countryside. However, if new residential development is necessary in Bromham, then any development in countryside is likely to have these inherent impacts. In this case, the landscape and visual effects would be limited and localised. The development would sit comfortably as a logical extension of the settlement in my view. For these reasons, I find no conflict with policies BE30 and BE35 of the LP which require that regard be had to the visual impacts of the development, site context and local distinctiveness, the quality of development and any adverse effects on the landscape and natural environment, amongst other things; Policies CP2, CP21 or CP24 of the CS which require that the character and quality of local landscapes are preserved, that consideration is given to context and opportunities to enhance character, quality and local distinctiveness; or the objectives of the Framework."

Landscape Effects

The character of the Site is heavily influenced by the close proximity of existing urban features and detractors, such as the residential ribbon development along Oakley Road and Lower Farm Road which currently defines the northern settlement edge. The presence of these urbanising features / detractors adjacent to the Site boundary and within the immediate area reduce the tranquillity and ruralness of the Site and its setting, this results in the Site clearly having a settlement fringe character.

The scale of the fields that make up the Site and the sense of enclosure provided by the existing mature vegetation structure within and to the Site boundaries provides a contrast to the more open arable

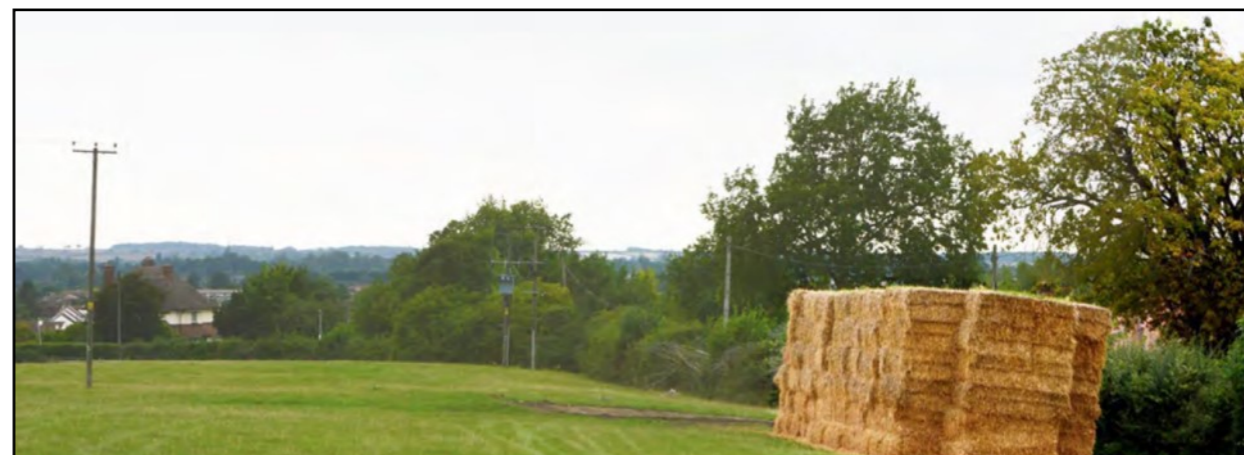
landscape to the north and west. This provides a degree of enclosure to the site which results in only glimpsed views possible out of the site to provide contextual relevance, which comprise, for the most part, of short distance views of residential roofscape and agricultural buildings.

Beyond the immediate setting, the sense of tranquillity is further affected by the proximity of settlement residential edges, namely Oakley and Clapham to the north and north east and the presence of the transport infrastructure of the A6 and mainline rail corridor to the north east / east. Additionally, there are notable agricultural complexes, which combined with the presence of the overhead transmission pylons, provide additional localised visual detractors. Furthermore, the original field enclosure pattern has been compromised by equine pasture usage, with electrified fencing within the site providing a visually intrusive feature that reinforces the settlement fringe character. The site is of relatively simple character and low in diversity and can be considered to be an unremarkable settlement fringe landscape.

Overall, the Site is not covered by any specific landscape designations and is not considered to represent a "valued landscape". Therefore, it is considered that the proposals can be integrated without harm to the receiving landscape character at a regional or local level remains.

Visual Effects

The Site is visually well contained within views from the north, west and south, due to intervening vegetation structures, prevailing topography and built form associated with the wider village setting of Bromham. This substantially limits the visibility of the Site to views from the immediate locality, namely Lower Farm Road to the south east and glimpses from Oakley Road to the north west. The retention and enhancement of the existing vegetative structures within and that which defines the Site boundaries would maintain the character of the Site and its setting. This provides a degree of separation between the proposals and the immediate and local landscape. In addition to this the existing built form consisting of ribbon development, with notable backland development, along Oakley Road and Lower Farm Road contains views of the Site from the wider context in the west and south.



3.3 Landscape

Given the degree of screening provided to the Site, the potential views of the Proposed Development would be highly localised. The proposed built form would be visible from a short section of Lower Farm Road and fleetingly from Oakley Road. Within the context of these views, the proposals would be perceived alongside the existing residential built form that characterises the immediate setting and current settlement edge. The proposals would not introduce any new or alien components to the views and as such would not adversely affect the character or amenities of the localised visual environment. Nor would the proposals affect any views towards, or an appreciation of, the St Owen Church tower or Bromham Hall listed buildings or Bromham Bridge Scheduled Monument within the wider village setting to the south. The proposals seek to incorporate opportunities for a robust scheme of landscaping that would reinforce the existing landscaped setting and ensure that the proposals can be integrated.

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

Landscape and Visual Review and Opportunities & Constraints

Any development within the Site should incorporate the following elements:

- Creation of an enhanced and defensible edge to the settlement to the north and east, enhancing the village edge and entrance to the village as well as providing an enhanced degree of separation between the Site and wider landscape setting to the north. This can be achieved through the management and reinforcement of the existing vegetation on these boundaries. The hedgerows should be enhanced with further native hedgerow planting and scattered hedgerow trees which would create a sympathetic and sustainable edge to the Proposed Development and the wider setting. The naturalised planting would also soften the perceived built edge and create an appropriate transition;
- Retention of mature native hedgerows and hedgerow trees that define the Site boundaries which would be enhanced with additional planting to strengthen this feature. Further to this proposed native tree and hedge planting within the development would reinforce the vegetated character of the settlement edge. Where vegetation removal is necessary along the southern boundary adjacent to Lower Farm Road, to accommodate access, new planting would be established behind sight lines to ensure that a green approach to Bromham from the east is maintained;
- Areas of Public Open Space (POS), providing opportunities for play and informal recreation, should be incorporated as part of the development. Of note is the substantial area of POS to the eastern Site boundary, which also provides a buffer between the development and adjacent existing farm complex, this feature would also provide opportunities for wildlife enhancements;

- Tree planting and wide verges incorporated within the residential area to break up the appearance of built development, and ensure the presence of tree planting within the development reflects that within the local and wider landscape. The proposed landscaping would 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 Proposed Development would also assist in breaking up the perceived built environment and provide opportunities for feature planting that would contribute to placemaking;
- Sustainable drainage / attenuation features to be included within at and around the Site entrance, in the south eastern 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 and an attractive entrance to the village when travelling along Lower Farm Road;
- 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, which is currently the situation. The outward facing properties create an active frontage to the development and also provide passive surveillance to the areas of POS within the development; and
- Incorporate a simple palette of materials and architectural detailing that reflect the local vernacular.



3.3 Landscape



3.4 Transport

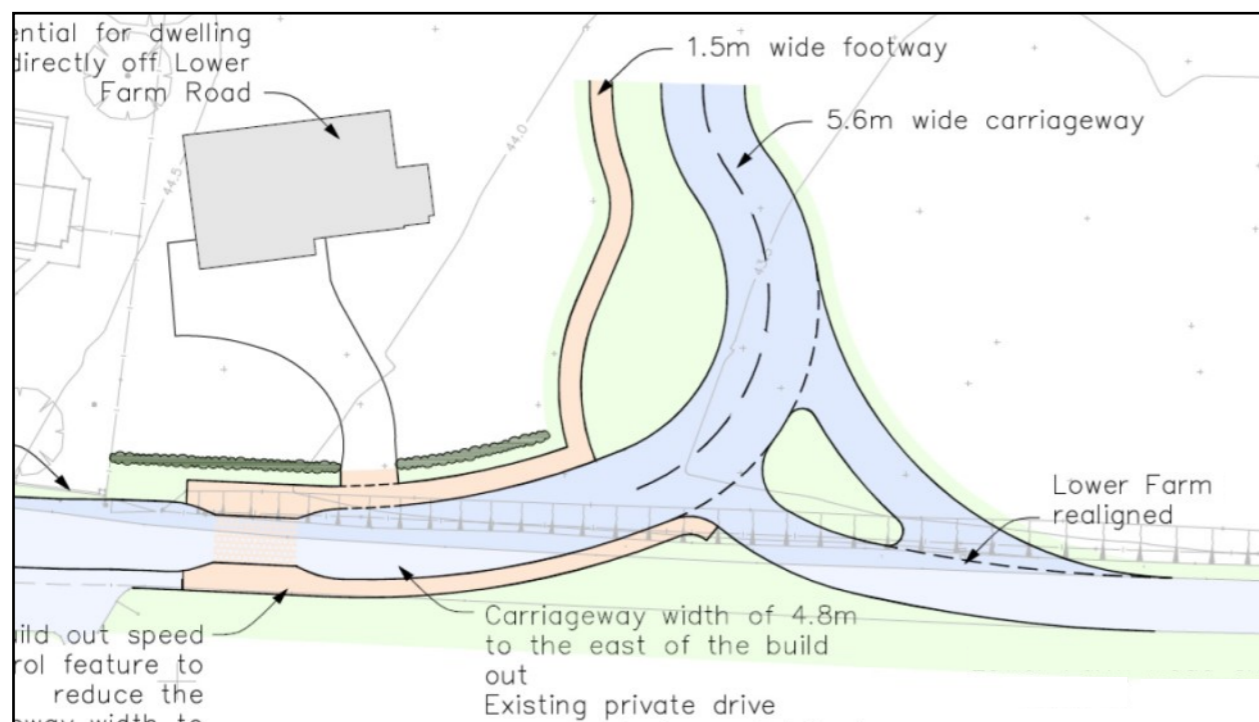
ADC were commissioned to provide transport advice to support the promotion of the site for residential development.

As set out in detail within the planning history section of this document, the development site was subject to a planning application for 93 dwellings in 2016 with access from Lower Farm Road. The proposals were refused and although the subsequent appeal was dismissed the proposals were considered to be acceptable in highway safety terms.

Lower Farm Road is subject to a 30mph speed limit and provides access to around 35 residential properties as well as a few farms, allotments, and the Bromham Lake Nature Reserve. There is an existing farm access approximately 50m east of the Lower Farm Road/Oakley Road junction that will be incorporated within the development layout to enable pedestrian access to the southwest of the development.

Highway works would be carried out on Lower Farm Road to provide access for both vehicles and pedestrians, in the manner supported in the previous application. Vehicle access can be achieved from Lower Farm Road to the east of the existing dwellings. Lower Farm Road would be re-aligned so that

Site access proposal from previous application (extract)



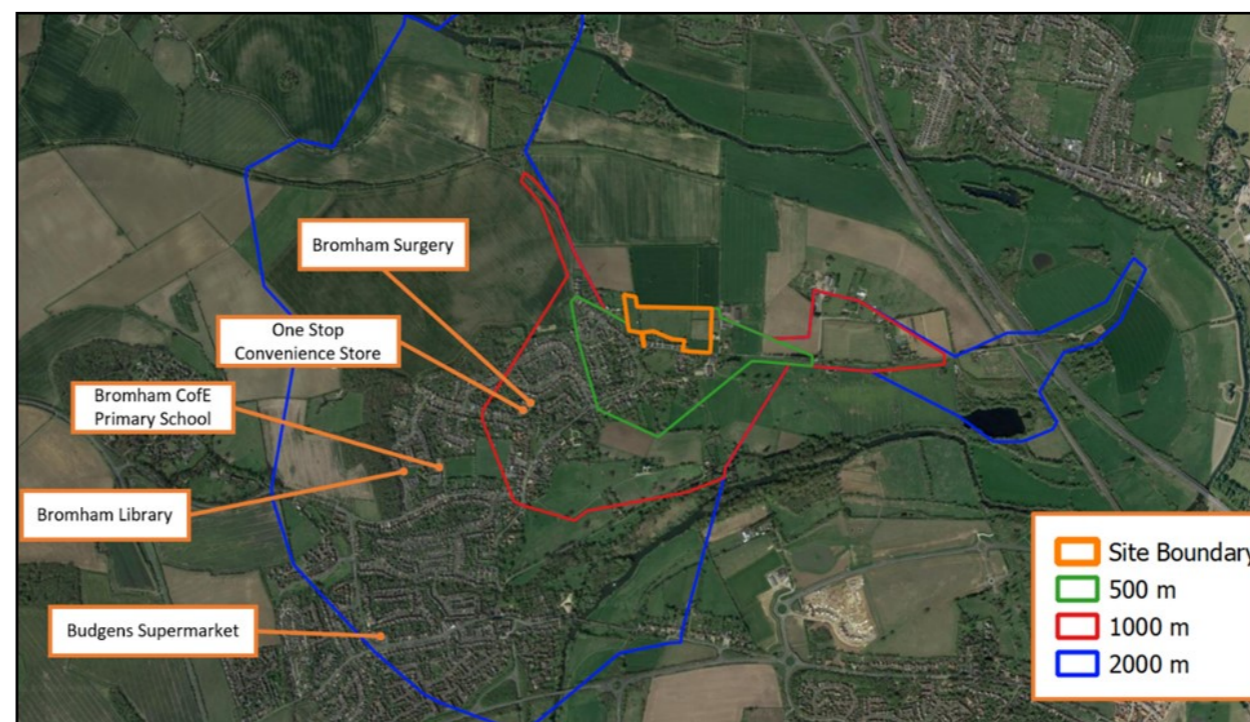
traffic routing in and out of the development would have priority. To control vehicle speeds, a build out, reducing the carriageway to 3.2m would be provided before the bend.

For pedestrians, a 1.2m wide footway would be introduced along the southern side of Lower Farm Road. A build out would be provided approximately 50m east of the junction with Oakley Road to link the development's pedestrian link on the northern side of Lower Farm Road to the footpath through the park. At Oakley Road a 1.2m wide footway would be provided for approximately 50m to the south of the junction to connect with the existing footway on the western side of Oakley Road via a build out.

In terms of the sustainability of the site, it is accessible by sustainable modes of transport, proportionate to the scale and location of the development. There is opportunity for pedestrian travel to services within Bromham whilst cycling and bus travel can be used to reach Bedford and surrounding areas.

There is a network of Public Rights of Way (PRoW) in and around Bromham. Notably, Footpath 1 runs north to south, extending to Village Road in the north and Bromham Park and Bromham Mill nature reserve in the south.

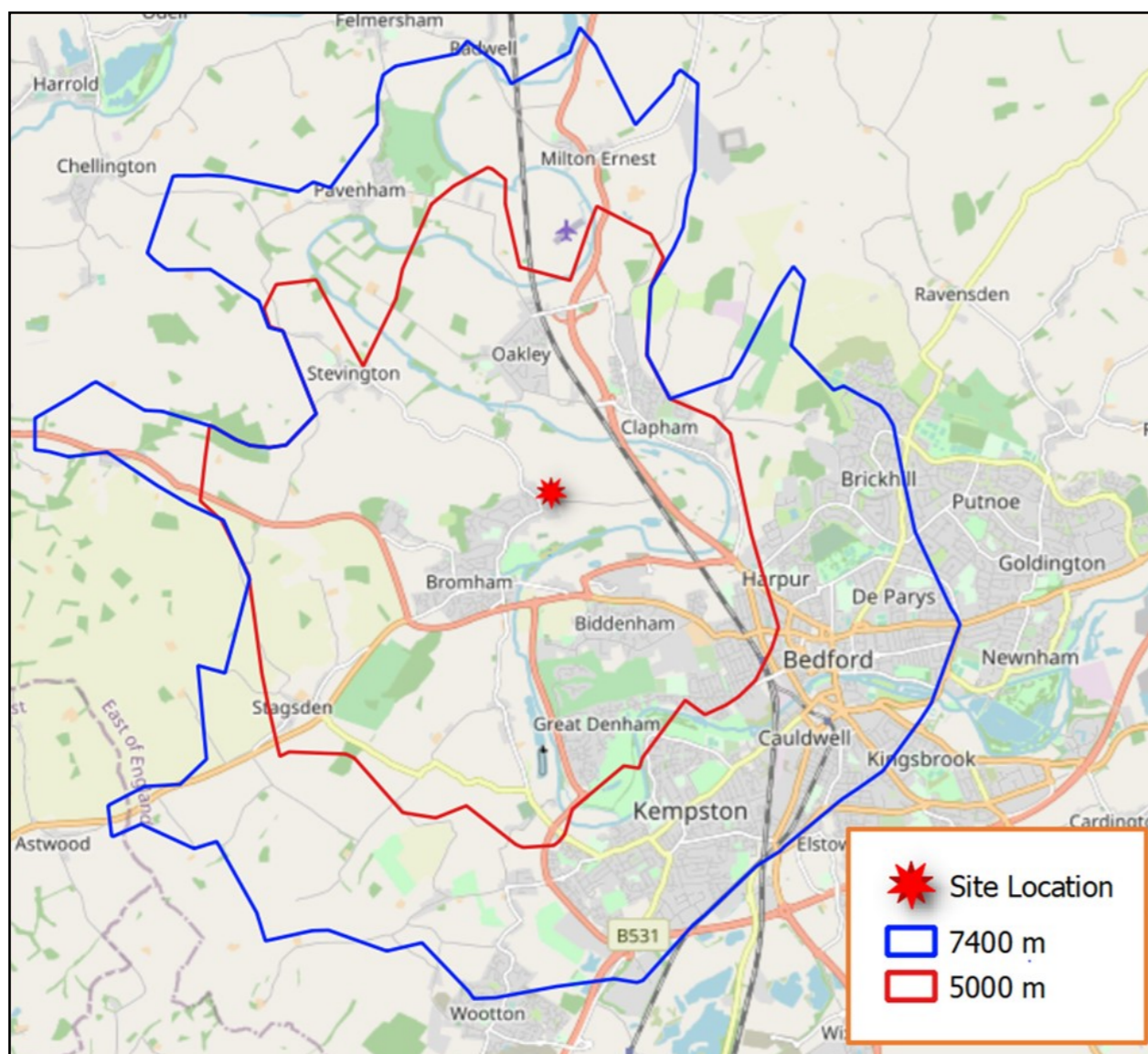
Pedestrian catchment area and local facilities



3.4 Transport

Cyclists are typically prepared to travel up to 5km for non-leisure journeys, such as those to school or work. The National Travel Survey⁵ records an average journey time for cycle trips of 23 minutes, 7.4 miles at an average cycle speed of 12mph.

Cycle catchment areas



The nearest bus stops to the site are on Oakley Road, approximately 175 metres from the pedestrian link in the southwest corner of the site. The stops are unmarked and serve the villager 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 provide access to regular services are on Village Road, adjacent and opposite Orchard Close. The bus stops are approximately 425m walking distance from the pedestrian link in the southwest corner of the site, and are served by the 41, A2, and E services. 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 Milton Keynes, Sainsbury's superstore, and Kempston.

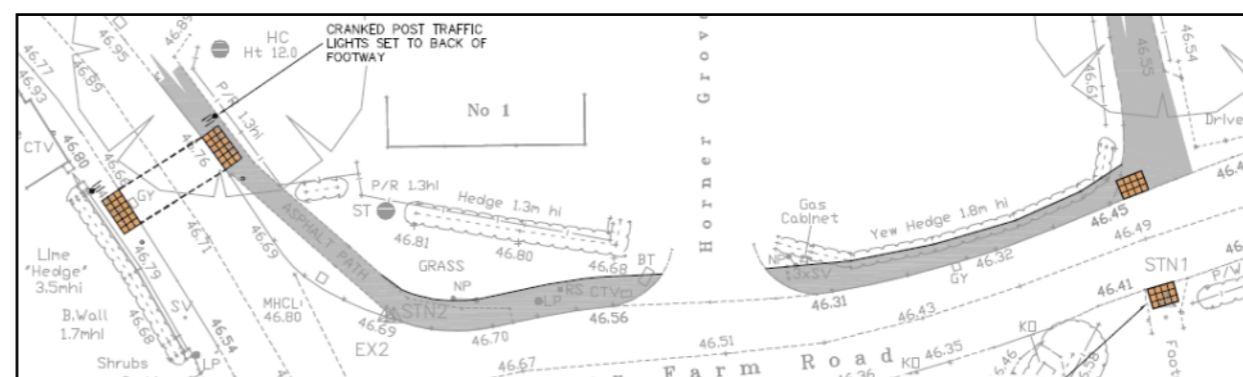
The Transport Assessment that supported the previous planning application calculated that the proposed development would generate approximately 56 two-way vehicle trips in the morning peak hour, and 60 in the evening peak hour. All vehicle trips would route through the Oakley Road/Lower Farm Road priority-controlled T-junction, and the majority would route to and from the south through the village of Bromham.

The modelling included within the Transport Assessment demonstrated that, with the development in place, the Lower Farm Road/Oakley Road junction would operate at around 6% of capacity. The Village Road/Grange Lane junction would operate at 26% of capacity, as such, these junctions will continue to have sufficient capacity to accommodate the development traffic.

The Stagsden Road/Village Road/Box End staggered crossroads was forecast to operate at 112% of capacity without the development, deteriorating slightly to 113% of capacity with the development. This minor impact was not severe and, therefore, mitigation was not necessary. If the site is allocated and an application is forthcoming, this result will need to be revisited. Altered traffic patterns and road openings are likely to have improved matters, and it is likely that the same conclusion will be reached. Mitigation options are available should there be an adverse impact.

Overall, the highway network can accommodate the increase in traffic resulting from a development of the site without a severe impact on highway capacity or an unacceptable impact on highway safety. The development is deliverable in transport terms, and it would accord with the NPPF's requirements.

Proposed pedestrian crossings



3.5 Flood Risk and Drainage

Flood Risk

A Flood Risk Assessment and Drainage Strategy report was prepared by EAS Ltd in November 2015 in support of the previous planning application. ADC have used the findings to inform their addendum produced for this site promotion document.

The site is within Flood Zone 1 and has a low risk of fluvial flooding, and also has a low risk from pluvial (surface water) and reservoir flooding. This low risk is summarised in the table opposite.

Mitigation for flood risk

Potential mitigation measures which will be considered for the site are based upon the Non-Statutory Technical Standard for SuDs and will include:

- “The drainage system must be designed so that, unless an area is designated to hold and/or convey water as part of the design, flooding does not occur on any part of the site for a 1 in 30-year (3.3% AEP) event.”
- “The drainage system must be designed so that, unless an area is designated to hold and/or convey water as part of the design, flooding does not occur during a 1 in 100 year (1% AEP) rainfall event in any part of the building (including basement); or in any utility plant susceptible to water (e.g. pumping station or electricity substation) within the development.”

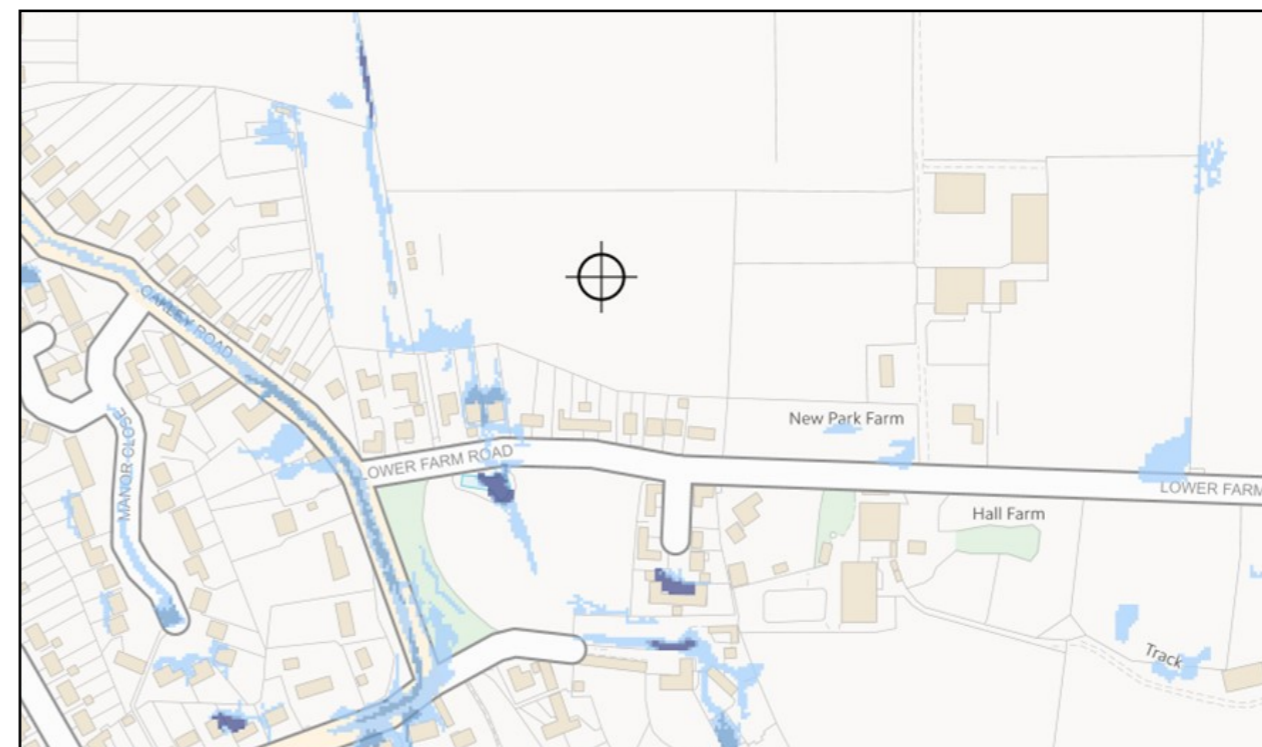
Finished floor levels could also be lifted above external ground levels, which should be shaped to direct exceedance flow from drainage systems along highway; into landscaped areas or drainage outlets.

The site is greenfield and comprises agricultural farmland and it is assumed that surface water either soaks into the ground or runs overland towards lower lying areas to the east and the existing land drainage network. On-site infiltration testing was undertaken in August 2015 to inform the previous surface water drainage strategy for the site, the results from which confirmed that it was proposed that shallow features such as permeable paving or swales be used to dispose of surface water runoff.

Based on the LLFA requirements, the surface water strategy should include a series of Sustainable Drainage Systems (SuDS) such as swales and detention basins. The previous FRA proposed a detention basin in the southeast corner of the site to provide the necessary on-site attenuation, with a restricted off-site discharge into either the existing land drainage network or via a new connection into the River Great Ouse. Based on the available infiltration testing, shallow SuDS features such as permeable paving for private driveways and shared car parking areas, as well as of swales, and other above ground features could be located in the landscaped areas of the site and offer limited infiltration.

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	Moderate	Mapping accompanying the Bedford Borough PFRA shows that the site falls within an area deemed to have a moderate susceptibility to groundwater flooding.
Sewers	Low	Site is currently greenfield and is not served by an existing drainage network.
Pluvial (Surface Water) runoff	Low	The EA flood mapping shows that most of the site is not at risk of surface water flooding. The exception being areas in the western portion of the site associated with low points in the existing topography.
Reservoirs and Waterbodies	None	The EA mapping shows that the site does not fall within an area deemed to be at risk of reservoir flooding.

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



3.5 Flood Risk and Drainage

Foul Strategy

As part of the previous foul strategy, a Pre-Planning Enquiry was submitted to Anglian Water, to gain an initial consultation response to determine a foul connection location. In response, it was confirmed that there is sufficient capacity within the adopted network to accept the foul flows generated by the development, a suggested connection point into the adopted network at manhole 2702 at the junction of Oakley Road and Lower Farm Road. However, a review of the topographical survey shows that levels slope down to the southeast, and that a connection into the Anglian Water network at manhole 4701 appears to be a more practicable connection point.

If the suggested connection point at manhole 2702 was to be used, and due to on-site levels, a pumped connection into this manhole is required to convey foul water flows off-site. The pumping station would be in the southeast corner, where the topographic levels are lowest.

The development is deliverable in terms of flood risk and drainage, 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.

Drainage ditch running along Oakley Road



Land drainage ditches running along the length of Lower Farm Road



3.6 Heritage

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

As set out earlier within this document a previous planning application for residential development of the site was refused by the Council and within a subsequent Appeal. The proposals were supported by an Archaeological Desk-based Assessment (CgMs Sept 2015) and a Geophysical Survey report (AOC Archaeology August 2015). A Statement of Common Ground was agreed with the Archaeological Officer for the Bedfordshire Borough Council in advance of the Appeal where it was agreed that no designated heritage assets were sensitive to development within the site and that the non-designated earthwork ridge and furrow within the site does not contribute to the significance of any designated or non-designated heritage assets outside of the site.

The appeal decision letter also confirmed that “as one of the last surviving areas of relatively well-preserved ridge and furrow in the parish of Bromham, it should be assessed as being locally to regionally important”. The Inspector proceeded to state that “given that the asset is of no more than high local – low regional significance, and that it is well understood, the overall harm in the planning balance is moderated’.

The proposed outline Masterplan drawn up in support of the site’s promotion has been developed in light of the Inspector’s comments and will provide for a reduced number of residential units to allow for a greater proportion of ridge and furrow. A sign board will be erected within the site, close to the footpath within the site that will explain the significance of the ridge and furrow, together with the results of any additional investigations undertaken.

Designated Heritage Assets

There are no designated heritage assets within the site.

There is one Scheduled Monument within the 1km search area; the Oakley Bridge (reference 1005397), located c.980m north-west of the site which is screened from the site by mature trees and local topography and is not sensitive to development within the site. There are twenty-two Listed Buildings within the search area, the majority of which are located within the village core of Bromham. None of these buildings are inter-visible with the site as they are screened by intervening built development.

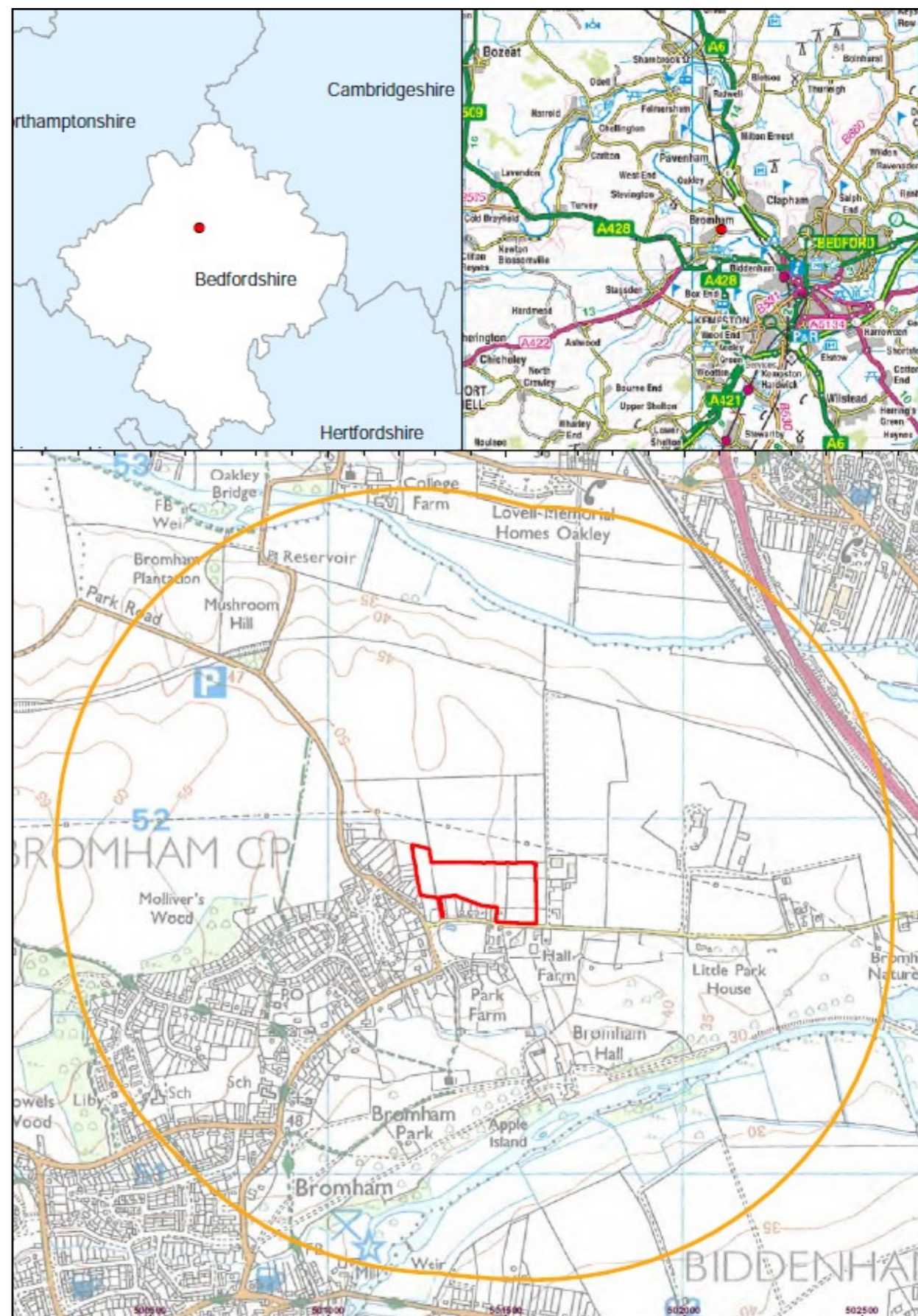


Figure opposite: Site Location with 1km area

3.6 Heritage

Non-Designated Heritage Assets

There is one non-designated heritage asset recorded on the study site; ridge and furrow (HER 1777; Figure 5). Detailed geophysical survey of the site was undertaken, in support of the planning application, in August 2015 by AOC Archaeology. The results have identified evidence of ridge and furrow in the central and south-eastern field, and possible archaeological features, including a semi-circular anomaly in the southern portion of the western field, a rectilinear set of anomalies in the central field and smaller rectilinear anomalies in the western and central fields (AOC Archaeology 2015).

Geophysical survey



Hedgerows

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

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

As part of this study, documents held by the Bedfordshire and Luton Archives and Records Service were consulted which included the 1798 Plan of Bromham parish. The western and northern perimeter boundaries and a north-south aligned internal field boundary are shown as field boundaries on this map and therefore, fulfil Criterion 5(a) of the Hedgerows Regulations 1997 as they can be demonstrated to be part of a field system pre-dating the Inclosure Acts (Figure 5). These hedgerows are therefore regarded as 'important' in terms of the regulations.

Conclusion

RPS have provided input into the proposed outline Masterplan drawn up in support of the site's promotion for allocation. This input has sought to reflect the Planning Inspector's comments and those made by the Archaeological Officer for Bedfordshire Borough Council. The number of residential units proposed has been reduced allowing for preservation of a greater proportion of the ridge and furrow.

A signboard will be erected, close to the footpath within the site that will explain the significance of the ridge and furrow, together with the results of any additional investigations undertaken. There is currently no public access to the site, so although a large proportion of the ridge and furrow within the site will be removed by the proposed development there will be enhanced public understanding of the remaining features. Works undertaken in advance of determination of future applications and potentially by condition attached to any future permission would also generate more detailed understanding of the site's historical development – information that would be added to the heritage signboard.

On the understanding that the needs case is resolved in terms of housing numbers, the significance of the ridge and furrow is not such that it would constrain future development of the site. The site is therefore assessed as suitable for allocation for residential development.

3.7 Noise and Air Quality

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

Noise Constraints

The construction phase of development could have adverse impacts upon occupiers of dwellings in close proximity of the site.

The main noise constraint to the development of the site will be noise from traffic using the local highway network. While Oakley Road and Lower Farm Road are the closest road sources to the site, the A6 running north from Luton to Bedford and located approximately 500m east of the site boundary.

Scope of Works

It is anticipated that the future development of the site for residential use has the potential to increase the traffic flows which could have an impact upon the existing noise sensitive receivers. The resulting noise levels will also determine the potential impact upon the proposed noise sensitive receptors. A number of noise sensitive receptors have been identified including residential properties that back on to the site including those on Lower Farm Road and Oakley Road.

Various acoustic design options and mitigation measures for a future development have been considered to inform the initial site master planning, through building orientation, internal layout, setback, landscaping or barriers, glazing and ventilation.

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 any 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 stage to aid in reducing future exposure. The potential construction impacts can be minimised through a Construction Management Plan, to the point that any adverse impacts will be temporary in nature.

Existing external ambient noise level are considered generally and are anticipated to be within the required criteria.

Air Quality Constraints

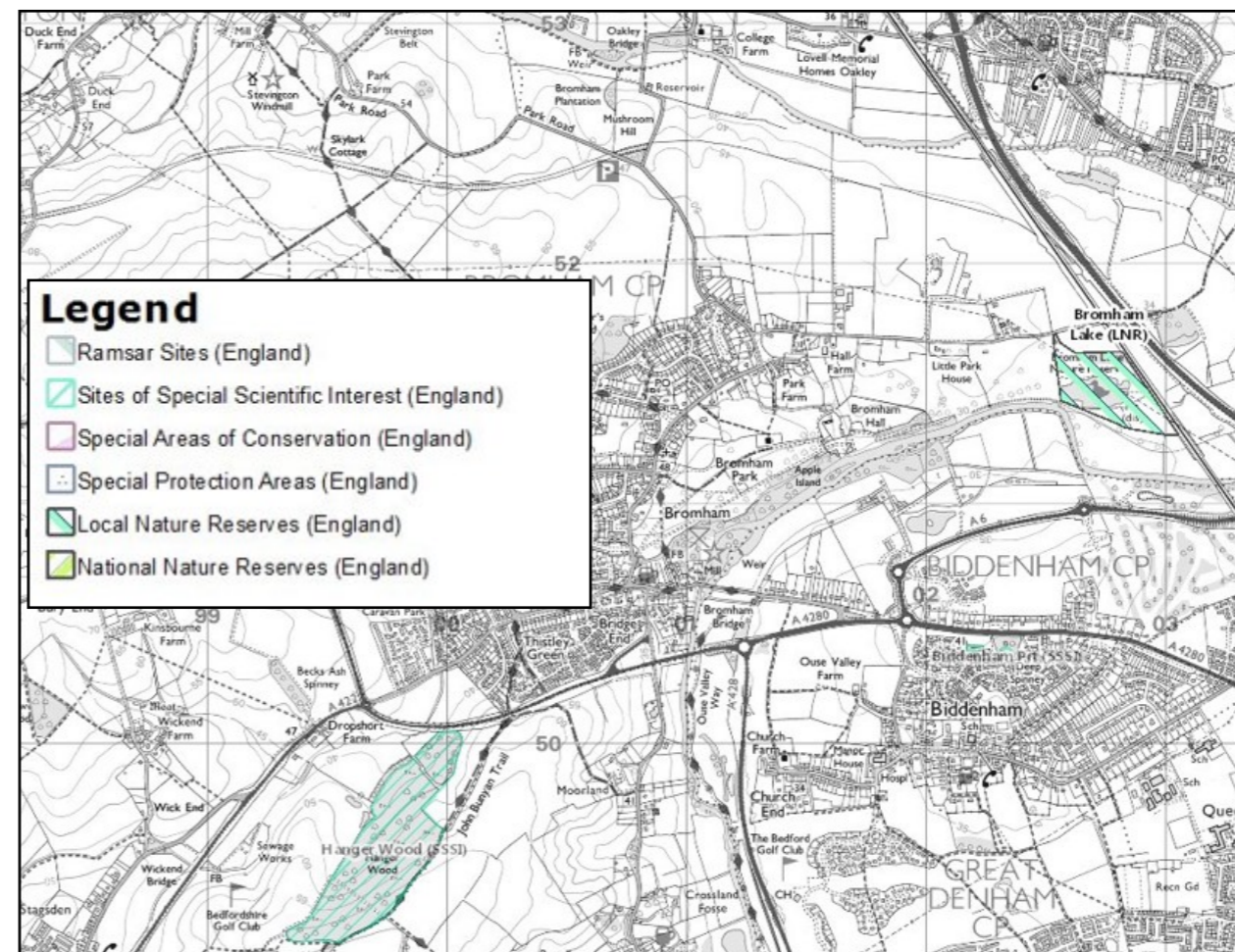
Under the Air Quality Strategy, there is a duty on all Local Authorities to consider the air quality within their boundaries and to report annually to Defra. Bedford Borough Council has one Air Quality

Management Area (AQMA) due to exceedances of nitrogen dioxide. The Borough has two automatic continuous air quality monitoring stations monitoring nitrogen dioxide (NO₂). A review of these sites indicates none of these are in close vicinity of the site, therefore, it is not considered that Bedford Borough Council are concerned about air quality concentrations in the area of the site.

A search of the area has not identified any significant industrial or waste management sources that are likely to affect a future development, in terms of air quality.

The nearby SSSI and Local Nature Reserves identified on the image below are located near to the site and may need further consideration.

Ecological Sites



3.7 Noise and Air Quality

Scope of Works

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

Through the undertaking of a dust risk assessment as part of the full detailed air quality assessment, a range of mitigation measures can be proposed, and built into a site-specific Construction Environmental Management Plan.

With the anticipated acceptable air quality concentrations in the locality of the site (on the basis no pollution monitoring is undertaken in the vicinity of the site), and the implementation of some of the mitigation measures above, it is anticipated that the impacts associated with the operational phase of proposed development can be mitigated to within an acceptable level.





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 amenity of residential properties along the southern boundary of the site needs to be carefully considered
- Access to the site to both pedestrians and vehicles which would result in Lower Farm Road being re-aligned so that traffic routing in and out of the site would have priority.
- Need to retain some important hedgerows.
- Presence of Ridge and Furrow in the eastern portion of the site..
- A public right of way crosses through the site and should be integrated into the scheme.

Opportunities

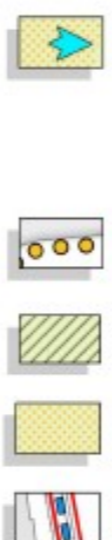
- Circa 75 high quality dwellings can be delivered with a mix of types and sizes to meet local need.
- Gaps within built form to limit impact of development to norther and southern boundaries.
- The creation of landscaped buffers along the southern edge of site to safeguard residential amenity of residents of dwellings along Lower Farm Road.
- Potential to retain and bolster hedgerows with native species to increase species richness and increase bio-diversity.
- Habitat connectivity through the site will be increased and enhanced to include woodland/ scrubland species-rich hedgerows, wildflower grassland, community orchard and wetland habitat including ponds.
- 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.
- 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 account of existing trees, hedgerows and identified Ridge and Furrow. As such the Framework Plan has been guided by the Arboricultural; Ecology and Heritage Assessments in particular.

4.0 Framework Plan



Native tree and hedge planting within the development would reinforce the vegetated character of the settlement edge.

Where vegetation removal is necessary along the southern boundary adjacent to Lower Farm Road, to accommodate access, new planting would be established behind sight lines to ensure that a green approach to Bromham from the east is maintained.

Potential location of childrens play area.

A substantial area of POS to the north eastern site boundary, which also provides a buffer between the development and adjacent existing farm complex, this feature would also provide opportunities for wildlife enhancements.

Incidental open spaces within the proposed development will assist in breaking up the perceived built environment and provide opportunities for feature planting that would contribute to placemaking.

A sustainable drainage / attenuation features to be included at the site entrance in the south eastern corner of the site. This will provide opportunities for native planting around the feature as part of the wider biodiversity enhancements across the site, creating a high quality landscape feature **within the development and an attractive entrance to the village when travelling along Lower Farm Road.**





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 44/414 (Lower Farm Road), as one of a number of sites around Bromham.

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

However, the site failed to pass through the Stage 2 where the Borough Council considered that the site was 'not suitable for development' and would be excluded from further assessment, the overall conclusion for which being the site having 'overriding highway constraints' following objections from the Highways authority requiring further investigation to confirm that access and visibility splays could be achieved.

This reasoning also appears within the 2018 Strategic Housing and Employment Land Availability Assessment December 2018.

"The Local Plan Strategy is for the sites in Bromham to be allocated in the Bromham Neighbourhood Plan and therefore sites will not be allocated in the Local Plan. The site was also not considered suitable and excluded from further assessment due to overriding highway constraints."

The Inspector dealing with the recent appeal did not consider that the development of the site would lead to highways issues and it is respectfully set out below why the site is suitable for development and should be given proper consideration by the Council through the emerging local plan review and within the emerging neighbourhood plan.

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 be 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 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.





Conclusion

6.0 Conclusion

This promotional document has been prepared on behalf of Kler Group Ltd. in respect of land at Lower Farm 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 Lower Farm 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 Lower Farm 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 Framework Plan 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 4.44 hectare site could deliver approximately 75 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;
- Creation of new habitat for wildlife including woodland, scrubland, species rich wildflower grassland, community orchard and ponds;
- Substantial area of public opens space with children's play and area of Ridge and Furrow
- New footpath link from the site to Lower farm Road
- Sustainable drainage features.

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

More than a planning consultancy

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