



Vision Statement

Bedford Road
Wilstead

Kler Group Ltd.

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Introduction

1.1 Executive Summary

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

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

The site is in single ownership.

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

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

This promotional document sets out Kler Group Ltd.'s thoughts on how a review to the Bedford Local Plan 2030 might progress, the implications in terms of strategy, the evidence base underpinning the Bedford Local Plan 2030 which will need to be updated but provides a sound basis for early discussion on how the review might progress, and how the site at Bedford 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 220 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.

Aerial view of the site



1.2 Site Location

The site consists of a large agricultural field extending to approximately 9.2 hectares located on the northwest edge of Wilstead. It is broadly rectangular in shape bar for residential curtilages protruding into the site along its northwest boundary.

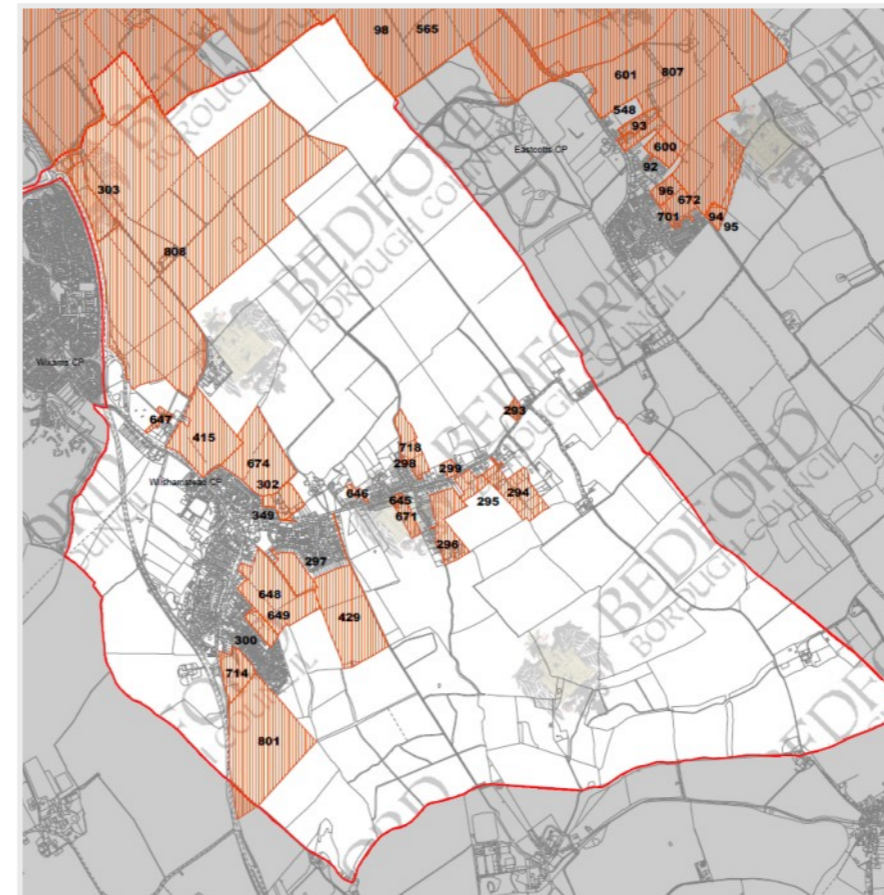
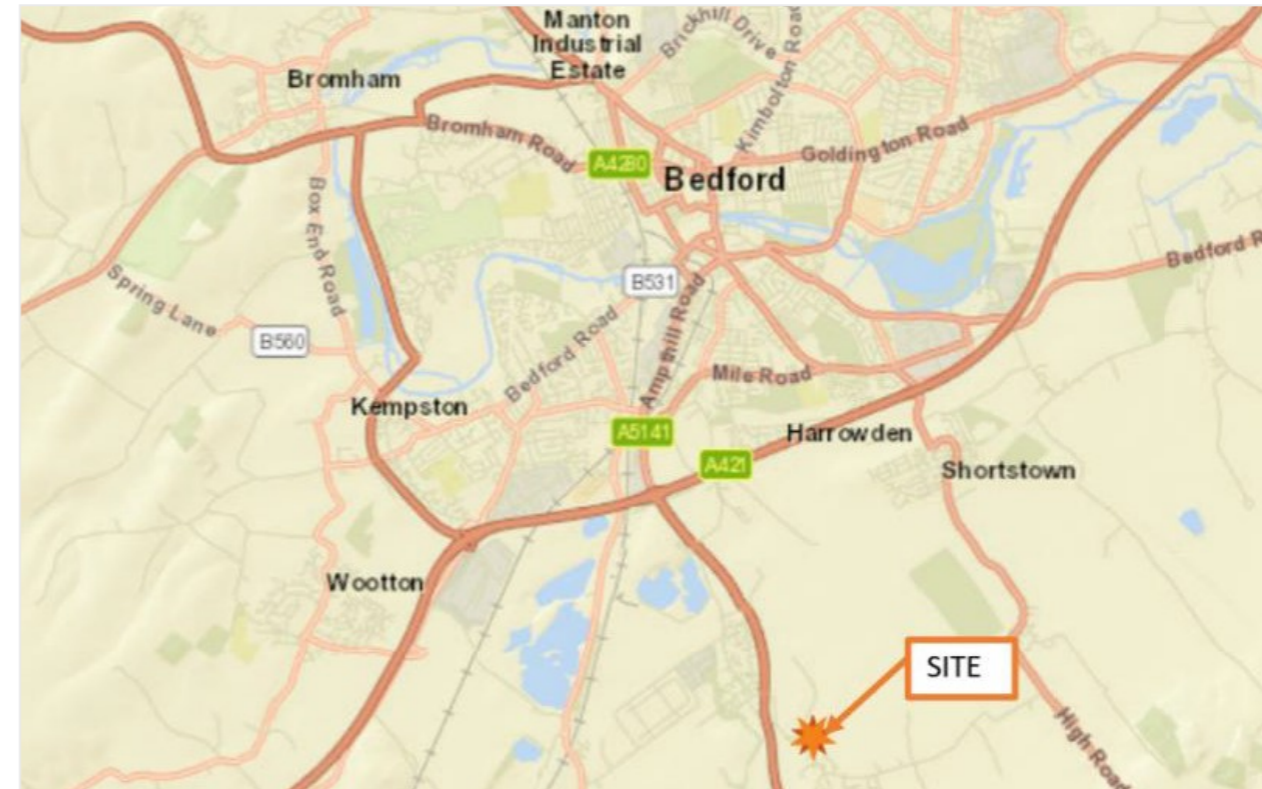
The site along the western and southern boundary is defined by hedgerow and trees. Bedford Road extends directly along the southern boundary of the site and links to the A6 approximately 600 metres to the north. A watercourse runs along the northern boundary of the site along Duck End Lane.

In terms of the surrounding context a bus layby and recycling bank are located immediately to the south of the site. To the north are a number of buildings and agricultural uses extending along Duck End Lane, a number of which are Statutory Listed. Directly opposite the western boundary of the site is a residential development comprising a number of barns and detached dwellings. A linear pattern of development and residential properties extend from the southwestern corner of the site along Bedford Road towards the A6.

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

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

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



1.3 Planning History

Planning permission was refused for a residential development of up to 250 dwellings, access, open space and associated works under planning application number 17/00284/MAO on 22nd February 2017 for the following reasons:

1. The proposal would result in residential development inappropriately located in open countryside contrary to the sustainable development objectives of the National Planning Policy Framework; saved Policy H26 of the Bedford Borough Local Plan 2002; and Policies CP1, CP13 and CP14 of the Bedford Borough Core Strategy & Rural Issues Plan 2008.
2. The proposed development would result in built 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 grain of development in the immediate locality. The development would therefore be harmful to the character and appearance of the rural area contrary to saved Policies BE30 (i), (ii) and (x), BE35 (i), (iii) of the Bedford Borough Local Plan 2002; Policies CP2 (v), CP13, CP21 (iii) and CP24 of the Bedford Borough Core Strategy & Rural Issues Plan 2008; and the aims of the National Planning Policy Framework.
3. The applicant has failed to demonstrate that the site is capable of accommodating up to 250 dwellings in a way which is sympathetic to the local village context and also capable of accommodating on-site drainage infrastructure, open space, outdoor sport and play facilities. For these reasons the proposed development fails to accord with the requirements of saved Policies BE29, BE30 and U2 of the Bedford Borough Local Plan 2002; Policy CP21 of the Core Strategy & Rural Issues Plan 2008; and Policy AD28 of the Allocations & Designations Local Plan 2013.
4. The proposed development, if permitted, would fail to secure and make adequate provision for affordable housing on the site. The development is therefore contrary to Policy CP8 of the Bedford Borough Core Strategy & Rural Issues Plan 2008 which states that on sites of 15 units and over the Council will expect the provision of 30% affordable housing.
5. The proposed development, if permitted, would fail to secure and make adequate provision for on-site play, sports pitch and open space facilities within the site. The development is therefore contrary to Policy AD28 of the Bedford Borough Allocations and Designations Plan 2013.
6. The proposed development, if permitted, would fail to secure and make adequate provision for speed reduction measures along Bedford Road. The development is therefore contrary to saved Policies BE30 and T20 of the Bedford Borough Local Plan 2002.
7. The development would generate demand for school places which cannot be met on the application site or within any nearby existing school site. In the absence of a proposal from the developer to provide sufficient new school places makes the proposal unsustainable. Therefore, the proposal, is contrary to saved Policy BE3(ii) of Bedford Borough Local Plan October 2002 and Policy CP30 of the Bedford Borough Core Strategy and Rural Issues Plan 2008.
8. The proposed development would significantly undermine the development plan objective of

preserving the gap which exists between Wilstead and Wixams in order to protect the character and identity of Wilstead. For this reason, the proposed development fails to accord with Policy AD42 of the Bedford Borough Allocations & Designations Local Plan 2013.

9. Insufficient information has been submitted as part of the application to demonstrate that the proposed development can achieve 30% on-site tree canopy cover and the application includes no alternative initiatives which would serve meet the Forest objectives to compensate for any tree canopy cover deficit. For these reasons the proposed development fails to accord with Policy AD25 of the Bedford Borough Allocations & Designations Local Plan 2013 and the landscape enhancement objectives of Policy CP24 of the Bedford Borough Core Strategy & Rural Issues Plan 2008.

One of the most important considerations at the time of the planning application being considered was whether or not the Council could demonstrate a 5-year supply of housing land and an up to date Development Plan. Although the applicant made the case that the Council did not possess a 5 year supply an appeal in April 2017 had tested the Council's method for calculating objectively assessed need – which resulted in confirmation that the 5-year housing supply could be demonstrated. Following that appeal, and prior to making the decision in relation to the site at Bedford Road the Council had updated both its assessment of objectively assessed need and five-year supply position. On this basis, there was no proven strategic need for the provision of additional housing development on the site.

Clearly, this position has now changed and the Council has commenced a Plan review to increase the level of housing growth contained within the recently adopted Local Plan 2030, which could be around 30% increase in the annual level of growth contained within that plan.

The other reasons for refusal would be addressed in full within any new planning application submission. This promotional document also demonstrates that there are no technical or environmental constraints prevent the site from being allocated for residential purposes as a first step towards bringing the site forward for development to assist the authority with the provision of 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 Neighbourhood Plan

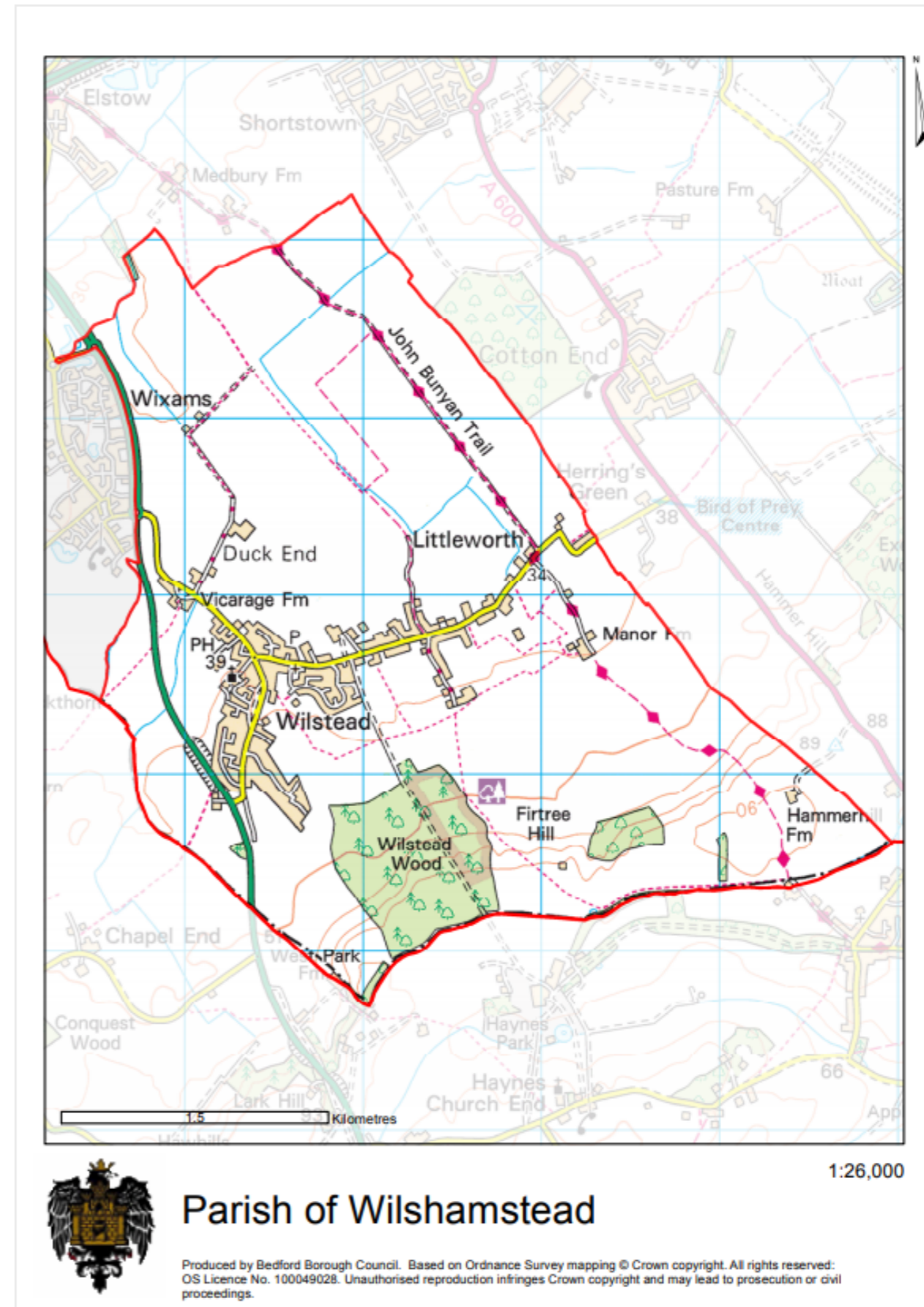
Wilshamstead Parish Council received its Neighbourhood Area Designation on 22nd February 2017. The area within the red line below contains the area to which the final Neighbourhood Plan will relate to once made.

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

Once approved the Plan will:

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

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



2.3 Site Assessment

Adopted Local Plan

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

Wilstead is a large village which lies close to the southern edge of the Borough Council's administrative area, and approximately 7 kms from Bedford town centre itself. The site in question lies on the north-western edge of the settlement and amounts to approximately 9.2 hectares.

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

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

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

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

The land at Bedford Road/Duck End Lane, Wilstead had previously been put forward for outline residential development for up to 250 houses (ref.17/00284/MAO) which was refused by the Council in September 2017.

In their determination of the planning application, the Council refused the application based on the following 9 reasons:

- the proposal would result in residential development inappropriately located in the open countryside;
- the proposed development would result in built development within an area of open countryside, thereby eroding the open, rural landscape of the area and would therefore be harmful to the character and appearance of the rural area;
- failure to demonstrate that the site is capable of accommodating up to 250 dwellings in a way which is sympathetic to the local village context and is also capable of accommodating on-site drainage infrastructure, open space, outdoor sport and play facilities;
- the proposed development, if permitted, would fail to secure and make adequate provision for affordable housing on the site;
- the proposed development, if permitted, would fail to secure and make adequate provision for on-site play, sports pitch and open space facilities within the site;
- the proposed development, if permitted, would fail to secure and make adequate provision for speed reduction measures along Bedford Road
- the development would generate demand for school places which cannot be met on the application site or within any nearby existing school. In the absence of a proposal from the developer to provide sufficient new school places, the proposed development is unsustainable;
- The proposed development would significantly undermine the development plan objective of preserving the gap which exists between Wilstead and Wixams in order to protect the character and identity of Wilstead;
- Insufficient information has been submitted as part of the application to demonstrate that the proposed development can achieve 30% on-site tree canopy cover and the application includes no alternative initiatives which would serve to meet the Forest objectives to compensate for any tree canopy cover deficit.

With regard to the first reason for refusal, *location in the open countryside*, it is acknowledged that Wilstead is 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 does lie within the open countryside, it does adjoin the defined Settlement Policy Area for the village would make a logical extension to the village without causing undue harm to the character and appearance of the village or countryside beyond.

2.3 Site Assessment

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.

With regard to the third reason, *failure to demonstrate that the site can accommodate up to 250 dwellings*, in support of this submission a concept plan has been prepared which indicates how the site could be developed to show areas of housing, site access, internal highway layout and infrastructure, together with areas of formal and informal open space and links to the existing settlement. Of course, the details are subject to further consideration under the submission of a planning application if there is support from the Borough Council to allocate the site in due course.

With regard to the fourth reason, *making adequate provision for affordable housing*, the site at Bedford Road 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.

With regard to the fifth reason, *making provision for on-site play, sports pitches and 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.

With regard to the sixth reason, *providing speed reduction measures on Bedford Road*, this is a matter of technical detail which, if there was support for the allocation of the site by the Borough Council, such measures would be discussed with the highway authority to ensure the safe access onto and use of the highway in the vicinity of the site.

With regard to the seventh reason, *generating demand for additional school places*, it is acknowledged that the development of new houses in the village would generate the need for an additional pupil spaces. Of course, it would be expected that any new housing development, including of the site at Bedford Road, would contribute towards the provision of educational places, a need that would be secured through normal mechanisms.

With regard to the eighth reason, *undermining the objective of preserving the gap between Wilstead and Wixams*. At present, the north-western edge of Wilstead is some 700 metres to the line of the A6 and the

south-eastern edge of Wixams. The north-western edge of the development site is formed by the line of Duck End Lane from which there would be an approximately 450 metre wide gap to the line of the A6 which is considered a substantial gap which could be maintained between the new site and the A6 to meet policy objectives. It should also be noted that there is a ribbon of housing development on the western side of Bedford Road, between the junction with Duck End Lane and the A6, which impacts upon the open gap to some degree.

With regard to the ninth reason, *the provision of tree cover within the development or compensation for off-site provision*, the principles of landscaping within the development site can be seen on the concept plan that accompanies this submission. Of course, the detailed landscape strategy is a matter for further design development and discussion in due course, should the Borough Council be supportive of the future development of the site.

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



Constraints and Opportunities

3.1 Arboriculture

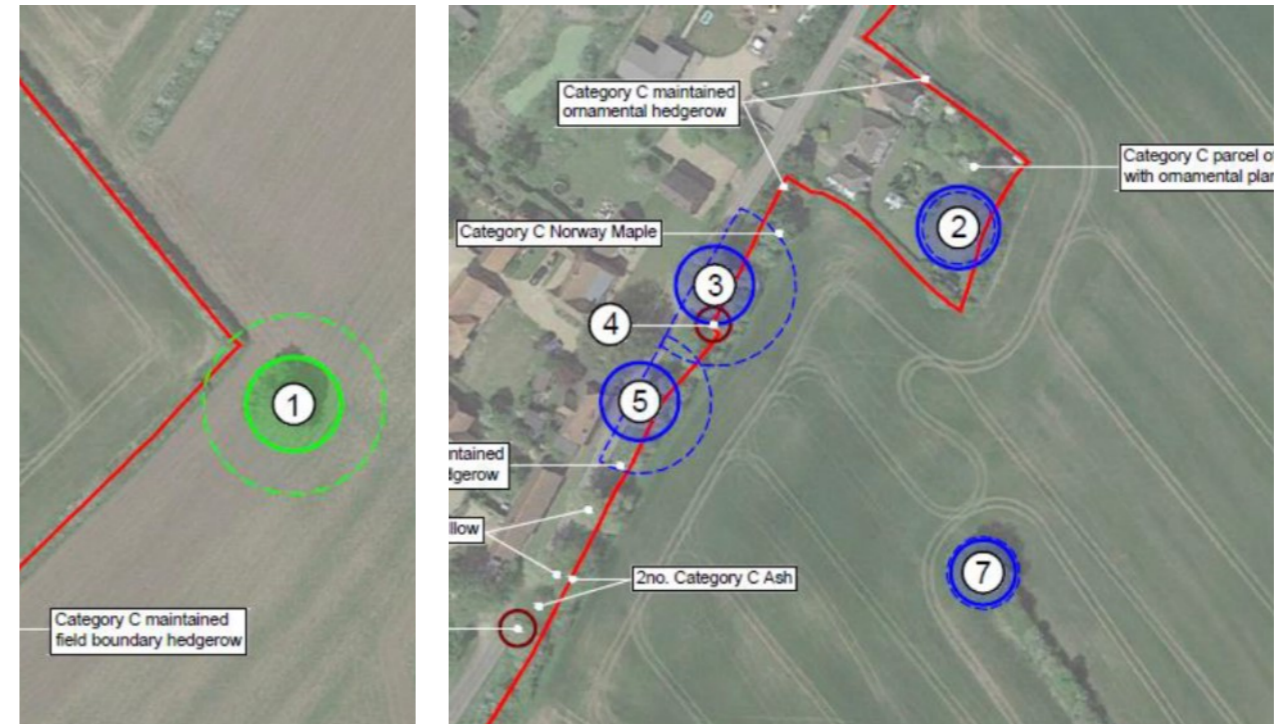
Aspect Arboriculture have provided a high level appraisal of the Arboricultural constraints and opportunities at the site to support this document.

As is typical for the current land usage, trees occur set within the agricultural field boundary hedgerows and offsite, where they are incidental to land under agricultural use. The native hedgerows separating the site from adjacent agricultural land to the northeast and southeast are currently maintained by flail. To the northwest and southwest, the management of the hedgerows separating the site from Duck End Lane and Bedford Road has lapsed. Of particular relevance are four moderate and one high quality individual trees which provide a valuable contribution to the amenity of the site, and its immediate surroundings.

Background checks reveal the absence of Tree Preservation Orders ('TPOs') confirmed within the site. The nearest TPO (no.1, 1995) applies to one Ash and one Evergreen Oak, set within the frontage to Duck End Farm opposite the site; neither tree is within influence of the promotion site. 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.

The principal tree within influence of the red line is an English Oak (former) pollard set within the neighbouring field bounding the site to the east. Veteran trees are defined by the National Planning Policy Framework as irreplaceable, wherein there is a presumption against development resulting in their loss or deterioration, without wholly exceptional reasons and a suitable compensation strategy. It is clear that the Oak will not be exposed to risk owing to its separation from the site, and this remains the case when veteran Tree Buffers ('VTB') consistent with Natural England and Forestry Commission standing advice are applied (illustrated). The presence of the Oak does not affect the deliverability of the promotion site and the tree would not be harmed should the site come forward, indeed the presence of the tree is considered to be a positive influence on the masterplanning process i.e. capable of underpinning an appropriate transition with the wider treescape and countryside.

Four trees within influence of the site are considered to warrant consideration as category B components of the tree stock. Only one category B tree is firmly within the red line, the remainder oversail the site from third party land; The onsite Oak tree has a balanced radial canopy structure and is capable of providing a long term contribution to the site's amenity. The remainder (two Willow and a Walnut) share the same moderate standard of crown condition as the Oak; whilst not native, the Walnut is at an advanced size for a domestic planting and it will relate positively to trees compatible with new residential development. The role of the Willow trees has been recognised in term of filtering views into and out of the site and maintaining the appearance of Duck End Lane.



Veteran English Oak set within adjacent field (left), Location of the site's category B trees (right).

Owing to its position within an arable field, the onsite Oak tree has the potential to provide outlying maturity and visual interest in a planned setting. Moreover its outlying position means it is unlikely that it there would be overriding pressure for the tree to be at risk during the masterplanning process. Owing to their third party status, neither the Willow trees or the Walnut tree are at risk of removal as a result of the site's promotion.

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

A Field Maple and White Willow adjacent to the site's northwestern boundary with Duck End Lane demonstrate particularly poor structural condition, owing to failed basal structures; they warrant consideration as category U trees and removal is recommended regardless of any future residential development.

All remaining tree cover within the red line area is of limited arboricultural merit i.e. they and their amenity contribution are readily replaceable, and their removal is supportable where unavoidable.

3.1 Arboriculture

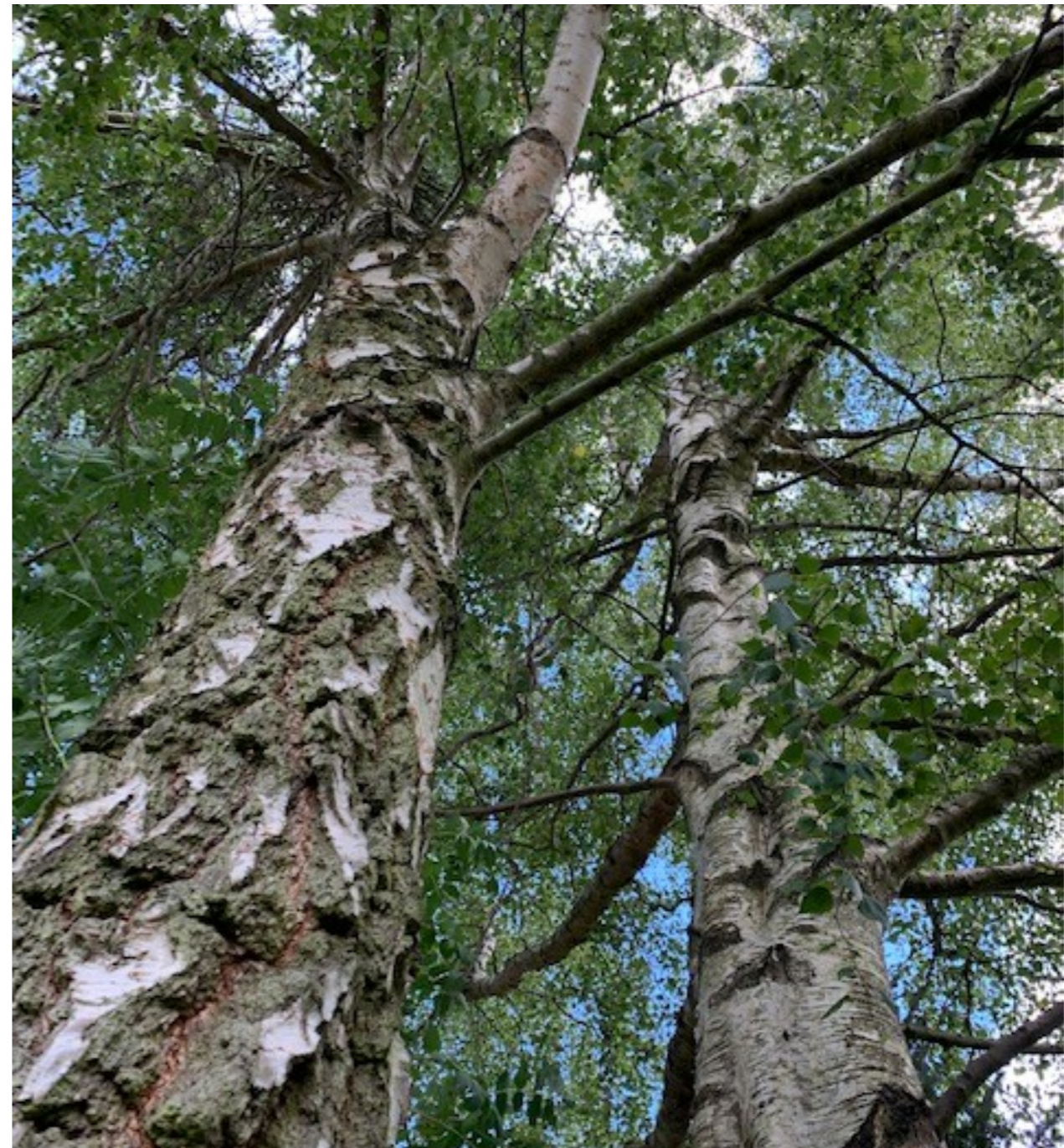
These trees are seen to as an opportunity to secure replacement trees of improved outlook, role and function. The site's category C tree cover comprises two primary elements:

- The majority are agricultural field boundary hedgerows surrounding the arable field, and a length of disconnected hedgerow which crosses the site. The majority comprise native and naturalised species; in the main, the external hedgerows are intact, cohesive and managed, and provide a defensible edge to the site – they should be considered constraints in this capacity, with limited opportunity for short section clearance to serve access requirements. In localised sections, most notably the disconnected internal section, management has lapsed. The hedgerows' compatibility within a residential setting is subject to the continuation of management across its whole form, and will need to be a determining factor during design; the current and former intensive management regime, using a tractor mounted flail, precludes unmaintained large crown development in any event. The key exception in terms of hedgerow composition surrounds the residential properties fronting Duck End Lane. In this location the extant hedges consist of trimmed Leyland Cypress and Lonicera, and are not considered a constraint to introducing residential development to the promotional area.
- Set within the hedgerows are a number of early mature Ash with occasional Sycamore and Norway Maple, which at their current age, are readily replaceable; in any event, it is improbable that these trees would pose constraints in their own right owing to their integration with the hedgerow as the primary feature.

It is noted that material consideration will be given to the objectives of the Forest of Marston Vale, through Policy 36S of the Local Plan. In effect this seeks to protect and enhance green infrastructure through the delivery of an uplift in canopy coverage. The extant field boundary network could readily form the framework for the introduction of new canopy in response this requirement, particularly since its future screening and transition role will increase in a residential setting. In any event it is foreseeable that canopy coverage would increase under development proposals.

It is anticipated that some low quality tree and hedgerow loss will be inevitable to accommodate new development on the site. Subject to sensitive design, however, this is anticipated to major on short lengths of boundary hedgerow to provide access. As highlighted on the attached appraisal drawing, the probability of development necessitating the removal of moderate quality trees is low. Subject to arboricultural input during design, it is realistically likely that the risk to the existing trees can be managed in the trees' interest or even improved in their favour, i.e. through the cessation of agricultural cultivation within their RPAs.

The low number of trees within the fields, provides numerous opportunities for enhancing the extant treestock in terms of canopy coverage and distribution through the introduction of a scheme of soft landscaping. A well designed development could provide both an increased quantum of large canopy bearing species within areas of Public open Space, alongside appropriate ornamental plantings within residential parcels where space is more constrained. This could complement and reinforce the site's few important trees. A varied planting palette can provide gains in quality and resilience, whilst eventually providing succession planting to ensure the long term presence of mature trees within the site.



3.1 Arboriculture



- ① Category A Veteran English Oak. 1395mm DBH. Height 18m.
- ② Category B Early Mature Walnut. 550mm, 450mm DBH. Height 13m.
- ③ Category B Mature White Willow. 1280mm DBH. Height 17m.
- ④ Category U Early Mature Field Maple. 400mm DBH. Height 6m. Appears to have previously failed at the base. Failure anticipated.
- ⑤ Category B Mature White Willow. 1040mm DBH. Height 15m.
- ⑥ Category U Mature White Willow. 1100mm DBH. Height 13m. Bole previously failed and separated leaving significant cavity. Failure anticipated.
- ⑦ Category B Early Mature English Oak. 690mm DBH. Height 12m.

- KEY:
- Site Boundary
 - BS5837:2012 Category A - Trees considered high priorities for retention within the developing scheme
 - BS5837:2012 Category A - Development Setback
 - BS5837:2012 Category B - Trees considered priorities for retention within the developing scheme
 - BS5837:2012 Category B - Development Setback
 - BS5837:2012 Category U - Trees recommended for removal

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. Previous surveys were also carried out as follows; Phase 1 survey, detailed Great Crested Newt surveys in 2015, eDNA surveys in 2016 and a reptile survey in 2017.

Ecological Designations	
Constraint	Low
Notes	<p>Statutory Designations</p> <p>The site itself is not subject to any statutory ecological designations. The nearest statutory designation is Kingswood and Glebe Meadows, Houghton Conquest Site of Special Scientific Interest (SSSI) and Local Nature Reserve (LNR) located approximately 3.4km south-west of the site. Kingswood and Glebe Meadows, Houghton Conquest SSSI and LNR include Ash/Maple woodland characteristic of the heavy Oxford and Boulder Clays, which is a scarce habitat in Bedfordshire. Glebe Meadows comprises an unimproved neutral grassland traditionally managed for hay and an adjacent woodland. The next nearest statutory designation is Maulden Wood and Pennyfather's Hill SSSI located approximately 4.2km south of the site, which comprises a large area of mixed deciduous and coniferous woodland supporting a rich invertebrate assemblage. The site is located within an Impact Risk Zone (IRZ) for Kingswood and Glebe Meadows SSSI, Maulden Wood and Pennyfather's Hills SSSI and Southill Lake and Wood SSSI. The IRZ only applies to large infrastructure developments such as airports, helipads and other aviation proposals and industrial/agricultural developments that could cause pollution.</p> <p>Non-statutory Designations</p> <p>The site itself is not subject to any non-statutory ecological designations. The nearest non-statutory designation to the site is Northwood Lane Meadows County Wildlife Site (CWS), located approximately 0.5km east of the site. Northwood Lane Meadows CWS comprises two neutral grassland fields mostly bound by hedgerows. The next nearest non-statutory designation is Hooked Lane Meadows CWS, located approximately 0.8km east of the site, which comprises a single neutral grassland field, usually horse grazed, with hedgerows present.</p>

Statutory and Non-Statutory Designations

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

Habitats	
Constraint	Low
Notes	<p>The site is dominated by a large, open, intensively managed arable field cultivated with Wheat <i>Triticum</i> sp. and bound by narrow field margins. As the arable field and associated field margins support a very limited diversity and abundance of common and widespread plants species, they are considered to be of negligible ecological value and do not constitute important ecological features.</p> <p>A total of four hedgerows demarcate the field boundaries within the site, which contain a number of young to semi-mature standard trees of ecological value at the local level. A single hedgerow (H1) at the west of the site is 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. An Oak tree of veteran status (T3) is located off-site to the east of the site boundary. Veteran trees are deemed irreplaceable as per Natural England standing advice and are therefore important ecological features. Four ditches bound the site to the west (D1), north (D2), east (D3) and south (D4), of which D1, D2 and D4 are associated with hedgerows. Ditch D1 supports a modest diversity of aquatic plant species and likely retains water year-round.</p> <p>Ditch D2 contains some standing water, though is heavily shaded, and ditches D3 and D4 were dry at the time of survey. None of the ditches constitute ecologically important features. Linear sections of dense scrub comprising common and widespread species are located within the arable field, along the southwestern site boundary, and the curtilage of the two residential properties at the west of the site.</p> <p>These linear sections of dense scrub form wide (4m – 7m) habitat features, and in the case of those sections running along the southwestern site boundary and the residential curtilage, connectivity to offsite habitats. As such, these areas of linear dense scrub are of ecological value at the local level, albeit do not constitute important ecological features. The remaining habitats within the site are of negligible ecological value and comprise small areas of scattered scrub and bare ground.</p>

3.2 Ecology and Biodiversity

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.

In order to safeguard against any potential run-off or pollution events during construction, best management practice will be followed in accordance with the advice issued by the Environment Agency in its Pollution Prevention Guidelines or relevant updated documents. This will essentially reduce potential pollution effects to nil, minimising any harm to wildlife associated with ditch D1 for example.

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

Bats

No evidence of roosting bats was found on any of the trees within the site. All of the on-site trees are considered to be of negligible potential to support roosting bats. A single large offsite veteran oak tree to the east of the site has moderate potential to support roosting bats. The network of hedgerows and treelines within the site provide habitat for foraging and commuting bats. Providing a future scheme design protects and retains the suitable foraging / commuting features, and a sensitive lighting scheme is adopted, bats are unlikely to represent a significant constraint to the future development of the site. A general bat activity (ideally spring, summer and autumn) may be prudent to confirm the site's value to foraging and/or commuting bats.

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 site offers very limited terrestrial habitat and no breeding habitat suitable for Great Crested Newt.

Fauna	
Constraint	<i>Low</i>
Notes	<p>Bats – a number of semi-mature trees are present on site, however none exhibit features with potential to support roosting bats, and no evidence of roosting bats was recorded. Off-site, close to the eastern corner of the site boundary is a large veteran Oak tree with moderate potential to support roosting bats. The on-site and adjacent habitats offer potential foraging and commuting opportunities for bats, albeit this is largely restricted to the site boundaries.</p> <p>Badger – no setts or evidence of Badger activity was recorded within the site, albeit the arable crop may provide a seasonal foraging resource for local Badgers and it is therefore possible that Badgers utilise the site for commuting and foraging.</p> <p>Great Crested Newt – records of Great Crested Newt were returned from BRMC within 2km of and adjacent to the site. No aquatic (breeding habitat) is present within the site and the vast majority of the site (arable) is of negligible value to GCN. Six ponds are located within 250m to the south and west of the site. Of the five ponds (P1 – P5) located to the west of the site recorded as containing GCN in 2015, ponds P1 to P3 make up a GCN receptor site for a nearby development, and received translocated populations in 2000, 2005, and 2015. Ponds P1 to P3 were re-surveyed using the eDNA technique in 2016, which returned a positive result for P1 and inconclusive results for P2 and P3. The closest pond previously confirmed as containing GCN is Pond P5, which was surveyed by a 3rd party consultancy in 2015 and is located approximately 55m west of the site boundary, separated from the site by a single field and a minor road. Access to pond P6 (located approximately 230m to the south of the site) for the purposes of a Habitat Suitability Index assessment was not gained and this pond is separated from the site by Bedford Road and residential housing. GCN may potentially utilise terrestrial habitat within the site given their presence in the surrounding area, albeit the majority of the site is arable, which offers negligible potential for GCN.</p> <p>Reptiles – The background data include records of common reptiles from within the local area, including a record of a grass snake adjacent to the site boundary but none from within the site itself. Though a Common Lizard was observed on the margin of Bedford Road, between 150-200m from the site in 2016, the site itself (arable) provides very low quality habitat for reptiles. Reptile surveys undertaken in 2017 of land adjacent to the site confirmed the presence of a single Common Lizard within a grass margin adjacent to a hedgerow to the south of the site, as well as a single Grass Snake within a grass margin adjacent to a garden curtilage to the east of the site. A small area of off-site suitable reptile habitat bounds the site to the north. As such, small numbers of reptiles could make use of the boundary habitats on an ad hoc basis.</p> <p>Birds – The background data include records for several Priority Species and Red List bird species within 2km of the site including Black Redstart, Skylark, Osprey, Spotted Flycatcher, Marsh Tit, Song Thrush, House Sparrow, and Yellowhammer. The site offers foraging and nesting habitat for local birds but is not likely to be of significant ornithological value.</p>

3.2 Ecology and Biodiversity

-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, particularly to bolster the existing areas of linear dense scrub within and bounding the site. Habitat connectivity across the site and to the surrounding landscape can be improved by the creation of new native species-rich hedgerows along the southern boundary of the site.

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.

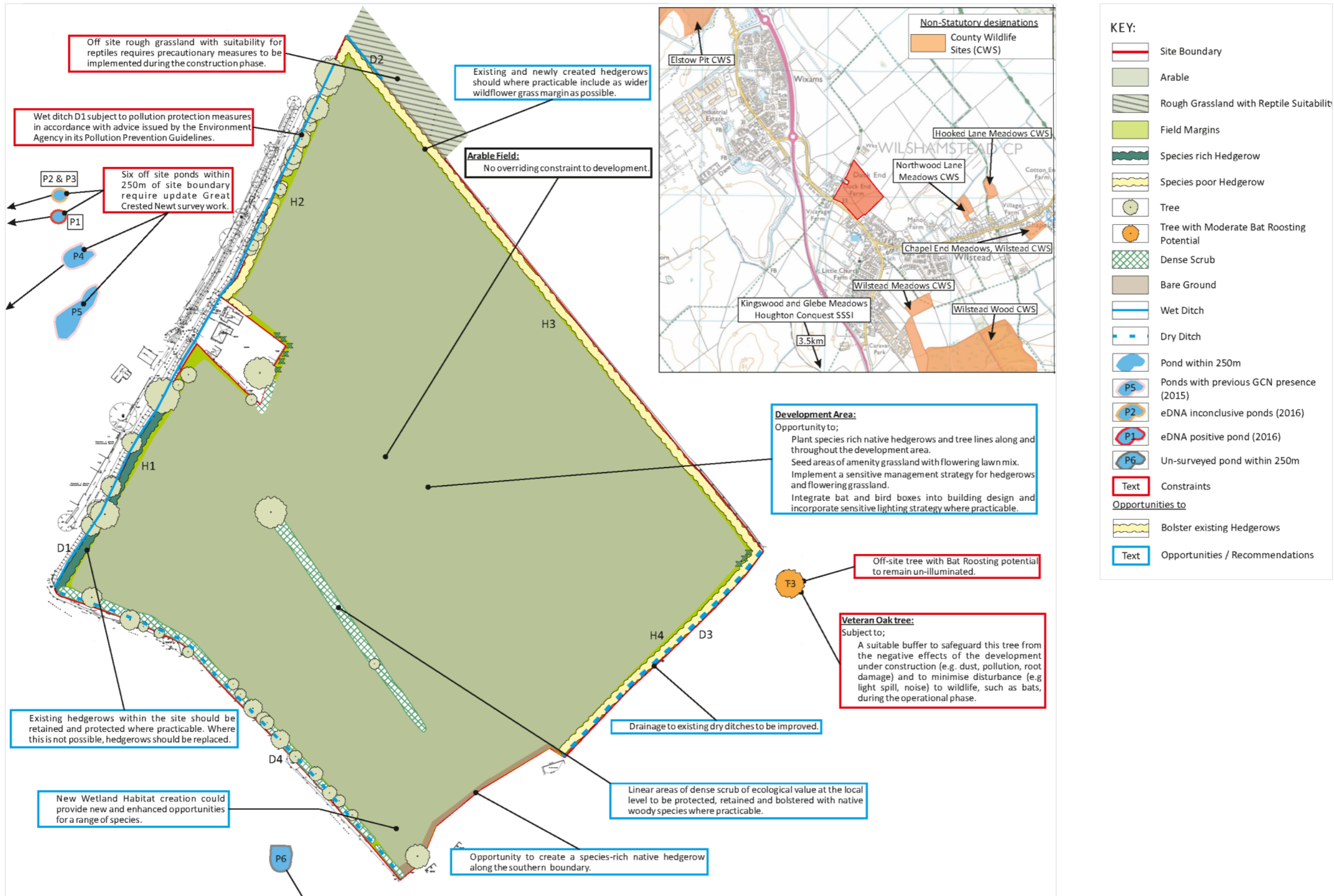
Birds – the habitat creation and enhancements described above will increase foraging opportunities for local birds. Additional nesting opportunities could be provided through the provision of a range of bird boxes for local species. A range of box styles for inclusion on both retained trees and newly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

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.

The Site comprises one large arable field, with a length of remnant historic native hedgerow located within the southern part of the Site which remains from when the Site consisted of two distinct fields. The Site as a whole is for the majority enclosed by established mixed native hedgerows and hedgerow trees that provides a degree of containment to the Site.

The south eastern Site boundary is defined by the existing settlement edge of Wilstead, formed of recent development of Cawne Close. The south western Site boundary is defined by a robust vegetation belt associated with the lay-by off Bedford Road which runs south east to north west adjacent to the north eastern edge of the A6 between Wilstead and Duck End Lane. The western corner of the Site is defined by the junction of Bedford Road and Duck End Lane and is lined to the south and west by residential development. Existing residential development to the east of Duck End Lane encroaches into the Site in the middle of the north western boundary. A notable complex of agricultural buildings, which includes a MOT test centre, lie to the immediate north of the Site. The existing development along Duck End Lane is sporadic and forms an urbanising feature within the setting of the Site. Beyond this development to the north west lies a more open rural landscape that provides a green buffer between development at Wilstead / Duck End Lane and Wixams further to the north east. The north eastern and south eastern Site boundaries are lined by semi mature hedgerows which extend into the Sites wider arable setting, overall the combination of flat landform, vegetation structure and built form affords a strong degree of physical and visual separation to the Site.

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

Other than the fragmented internal hedgerow, the internal components of the Site offer little in the way of landscape value however the more established vegetation structure and mature hedgerows along the boundaries provides a high degree of containment and visual separation from Bedford Road and immediate adjoining fields to the north east, east, south and north west.

Topography

Within the wider setting, the Site is located within a broadly flat landscape, at approximately 33m Above Ordnance Datum (AOD), which when combined with the extent of vegetation within the sites immediate context provides a compartmentalised landscape.

Public Rights of Way

The Site is not publicly accessible. There are however a number of public rights of way located within the vicinity of the Site including a permissive right of way which runs along Duck End Lane to the west of the Site. A network of footpaths and bridleways also run through the wider landscape to the north of the village. The John Bunyan Trail Long Distance Route is located approximately 1.37km to the north east of the application site.

Relevant national and local landscape related policy has been considered and is set out in full in the Note. Key points are as follows:

Policy AD42 Local Gaps of the Bedford Borough Allocations and Designations Local Plan July 2013

The site is located within an area identified as the Wilstead-Wixams 'local gap'.

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

- diminishes the gap physically or visually;*
- changes its character adversely;*
- compromises the integrity of the gap, either individually or cumulatively with other existing or proposed development; or iv. harms the character, setting or identity of any settlements separated by the gap. Proposers of development in or adjoining a local gap will be expected to demonstrate to the satisfaction of the local planning authority that their proposal does not conflict with the objectives of this policy.”*

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

3.3 Landscape



Key:

-  Application Site Boundary
-  Public Rights of Way

3.3 Landscape

Landscape Character

At a regional level, the Site is located in the centre of the Bedfordshire and Cambridgeshire Claylands National Character Area (NCA88).

Borough wide Assessment – key characteristics of the Landscape Character Type are:

- “A large scale, flat, open vale landscape underlain by Oxford Clay. Included as part of the Forest of Marston Vale.
- Tributaries of the River Great Ouse, including the Elstow Brook, cross the landscape in deep drainage channels....
- Expansive views across the vale to the Wooded Greensand Ridge (6b) that forms a prominent backdrop to the Vale and which provides some sense of containment
- Formerly meadow pasture, land use is now predominantly defined by intensive arable cropping contained within medium to large arable fields. Some smaller fields given over to pasture and horse grazing remain.
- A regular parliamentary enclosure landscape - variable field and roadside boundaries characterised by short flailed, gappy hedges, with some large open fields where boundaries have been removed. □ Woodland is sparse across the character area, the most significant being relatively recent planting at Water End Wood and Cotton End
- The A6, A600 A603, A421 and various secondary roads e.g. Southill and Northill Road, cut through the landscape, having a strong visual and audible presence.
- The urban edge of Bedford, on the northern boundary, brings urban fringe characteristics to the landscape and nearby settlements of Shortstown
- Transitional character in places e.g. redundant Cardington RAF base in process of regeneration to mixed used development.”

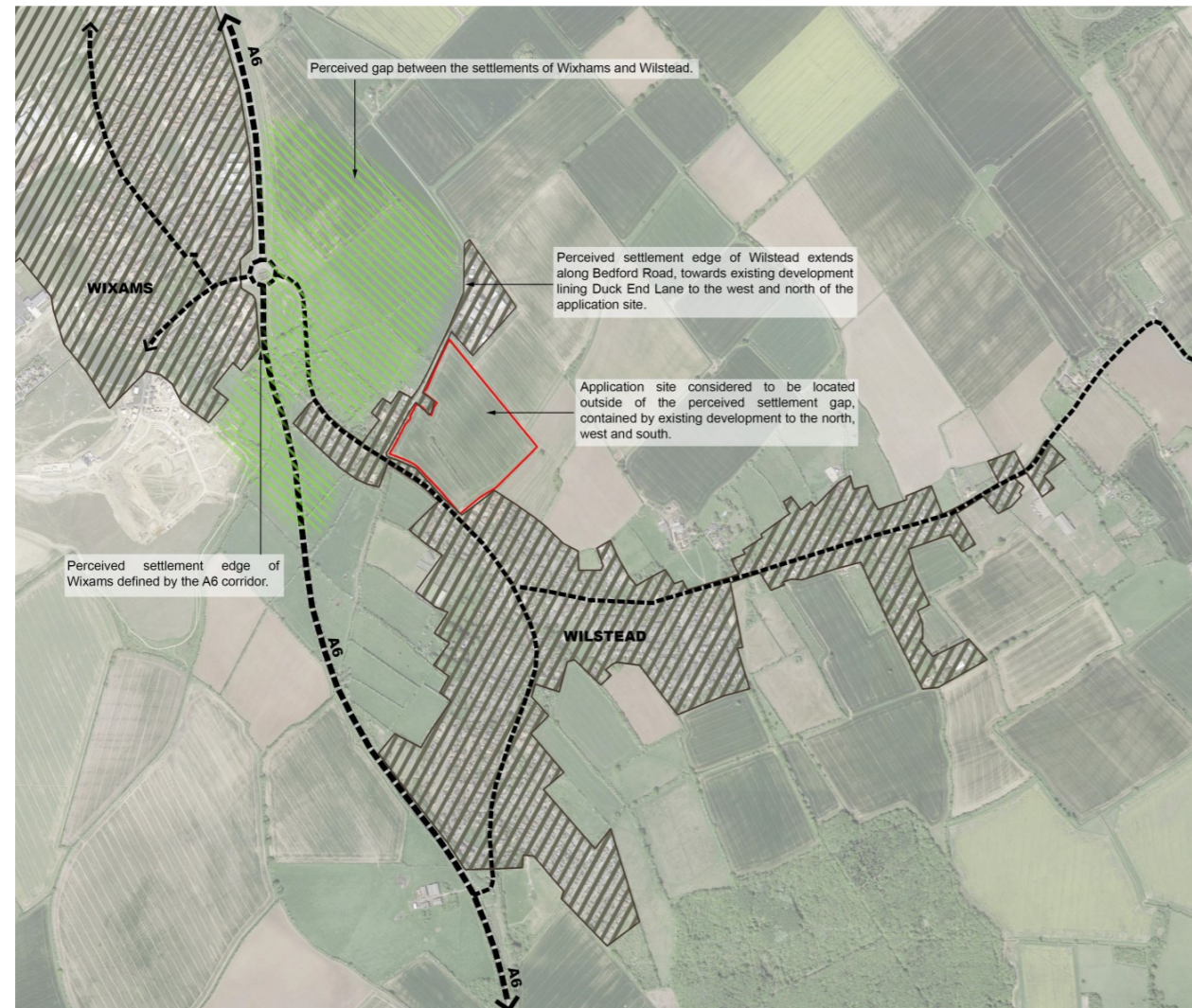
The assessment identifies that the landscape strategy for this area is to renew / create features of the landscape. The landscape management guidelines consider that this landscape should

- “renew field boundaries where these are gappy and apply a consistent management strategy to enhance the field and land cover pattern;
- Continue to create areas of woodland to enhance the ecological and recreational resource;
- Small scale planting around villages, particularly areas of new development, and around individual farm buildings is a key opportunity and will help integrate these features into the landscape;
- Seek to limit the use of coniferous shelterbelt planting that does not respond well to the character or landform of the vale.”

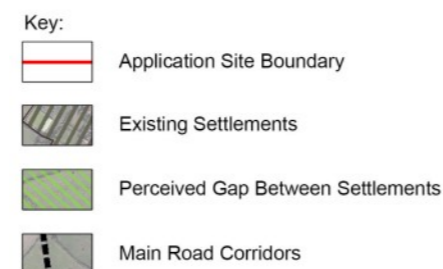
In addition to this the assessment provides development guidelines, these require any proposed development to;

- “Conserve the landscape setting of Elstow Abbey and the Cardington Airship Hangars.
- Maintain an open setting in scale with the Cardington Sheds.
- Conserve the dispersed pattern of settlements - preventing linear expansion and the merger of villages e.g. Shortstown with Cardington and Wixams with Wilstead
- Conserve the unique, historic character of Cardington and the ‘garden city’ vernacular of Shortstown. □ Prevent further urbanisation of the rural roads - and ensure that traffic management measures are sympathetic to the rural character.
- Improve settlement edges where these form an unsympathetic relationship with the open countryside - small scale woodland planting is a key opportunity but should not obscure views to the Mid Greensand Ridge (6b), rather it should form part of a connected network which complements and responds to topography and landscape structure of the ridge.
- Consider further opportunities for landscape enhancement along the rail and road corridors e.g. through planting of hedgerows and hedgerow trees where appropriate, and to better integrate raw and exposed edges such as at Shortstown.
- Conserve locally distinctive influences such as the palette of bricks used in buildings.
- Development on the southern edge of Bedford should seek to create a high quality urban edge and ‘gateway’ to the town.
- Conserve the clear views and visual relationship with the Mid Greensand Ridge (6b). Avoid any large scale, taller development of land at the base of the ridge to retain the dramatic visual contrast between the flat vale and steep slopes.
- Conserve and enhance access and connections from the urban area into the vale e.g. the John Bunyan Trail. Avoid severance of existing routes. Consider opportunities to create further green infrastructure – the tributary valleys such as the Elstow Brook are a key opportunity.”
- The development guidelines within the assessment have been reviewed and inform the design development for the proposals.
- In addition to the above, the Site forms the southern extent of the ‘Local Gap’ between Wilstead and Wixams. However, since the adoption of the Allocations and Designations Local Plan there has been significant development to the southern settlement edge of Wixams which has narrowed this gap. Further to this, the existing development along Duck End Lane and around the junction with Bedford Road relates more closely with Wilstead. Therefore the ‘Local Gap’ is considered to be the area of open agricultural land, circa 300m, between Duck End Lane and the settlement edge of Wixams. It is clear that development within the Site would not result in the coalescence of these two settlements.

3.3 Landscape



Enclosures Plan



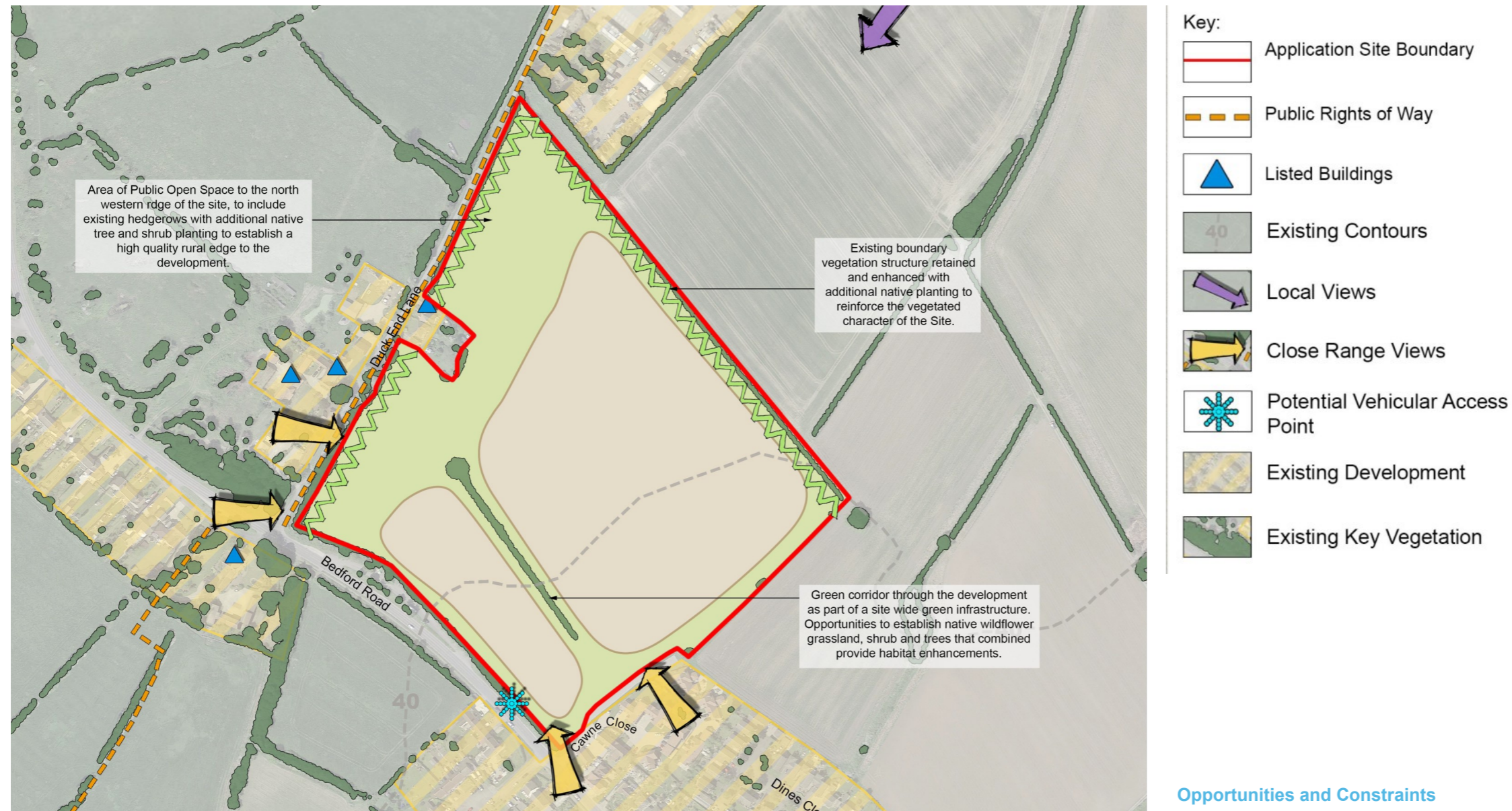
The Visual Environment

- The Site is visually well contained within views from the north, west and south, due to intervening vegetation structures, prevailing topography and built form associated with the wider village setting of Wilstead and Duck End Lane, respectively. This substantially limits the visibility of the Site to views from the immediate locality, namely Cawne Close to the immediate south eastern boundary and glimpses from Bedford Road at the southern corner and Duck End Lane to the north west. The retention and enhancement of the existing vegetative structure within and that which defines the Site boundaries would maintain the verdant character to the Site and its setting. This would provide a degree of separation between the proposals and the immediate and local views. In addition to this the existing built form consisting of residential development and a notable complex of agricultural buildings, along Duck End Lane and Bedford Road contains views of the Site from the wider context in the north west and west.
- Given the degree of screening provided to the Site, the potential views of the Proposed Development would be highly localised with the exception of the wider elevated view from London Road which takes in a panoramic view over the flat arable landscape to the south of Bedford. The Site is glimpsed in the middle distance and seen in context with the existing settlement of Wilstead to the south east and the wider urban edge of Bedford to the north.



- Where there are immediate views the Site is 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. The proposals seek to incorporate opportunities for a robust scheme of landscaping that would reinforce the existing landscaped setting, ensuring that the proposals can be integrated and with a notable area of public open space (POS) to the north western boundary would provide a breathing space between the proposed development and the listed buildings located along and around Duck End Lane.

3.3 Landscape



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

Any development within the Site will incorporate the following elements:

- Creation of an enhanced and defensible edge to the Site and overall settlement to the north east, with the proposed landscape strategy retaining and enhancing the Site boundaries, with a notable area of POS within the north west of the Site. This reinforces the separation between the Site and local and wider landscape setting to the north west and the residential development along Duck End Lane, which includes a number of listed buildings. The boundary vegetation would be enhanced with further native hedgerow planting and scattered hedgerow trees which would create a more appropriate edge to the Proposed Development and within the wider setting. The naturalised planting would also soften the perceived built edge and create an appropriate transition;

3.3 Landscape

- An offset to the north western Site boundary to be incorporated to ensure an appropriate buffer to the listed buildings within the immediate setting of the Site is achieved. This would comprise a broad landscape buffer, which itself results in opportunities to establish native wildflower grassland, shrub and trees that combined provide habitat enhancements. These features not only contribute positively to the local biodiversity, but also provide seasonal visual interest for residents;
- Retained boundary vegetation will be supplemented / enhanced 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 part of the south western Site boundary to accommodate access, new planting would be established behind sight lines to ensure that the verdant streetscene is maintained;
- The proposals seek to achieve an “outward looking” development, with properties fronting onto the Site boundaries, rather than turning their backs on the edges of the Site and presenting a hard edge formed by rear garden boundaries. The outward facing properties create an active frontage to the Proposed Development and also provide passive surveillance to the areas of public open space within the development;
- Areas of Public Open Space (POS), providing opportunities for play and informal recreation, should be incorporated as part of the Proposed Development;
- Incidental open spaces, which includes the existing remnant hedgerow within the south western part of the Site, 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 the POS, in the north western part of the Site. Not only is this a sustainable drainage solution, but opportunities exist to provide a mosaic of habitats to include native wetland planting around these features as part of the wider biodiversity enhancements across the Site, that also forms part of the high quality landscape setting to the Proposed Development.
- Incorporate a simple palette of materials and architectural detailing that reflect the local vernacular.

Subject to the inclusion of the landscape elements outlined above, development on the Site can be accommodated in this location without detriment to the localised or wider visual amenity and that the integrity of the receiving landscape character would be preserved, with proposed landscape features contributing positively to the identified landscape character.

3.4 Transport

ADC Infrastructure Ltd has provided transport and highways advice to support this promotional document.

Existing highway environment

The development site is on the northwestern edge of the village of Wilstead. The site is northeast of Bedford Road and southeast of Duck End Lane and is used for agricultural purposes. Bedford Road is subject to a 30mph speed limit and is approximately 7.5m wide. There is an existing farm access at the southern end of the site on Bedford Road. Duck End Lane is subject to the national speed limit and is approximately 4.8m wide at its southern end where it joins Bedford Road at a priority-controlled T-junction.



Aerial photograph of the development site

There is a footway on the southern side of Bedford Road, separated from the carriageway by a grass verge. The footway continues northwest and provides pedestrian access to the northbound bus stops on Bedford Road. Further north it connects with a footway/cycleway that continues under the A6 and leads towards the 'new town' of Wixam. To the southeast, a footway continues into the centre of Wilstead. On the northern side of Bedford Road, along the site frontage, there is a layby set back from the carriageway by a grass verge. The layby acts as a waiting area and provides access to existing recycling facilities. At the northern end of the layby there is a bus stop for southbound services.

Access

The previous application proposed that the development be accessed via two new simple Tjunctions, as shown below. This proposal was accepted by the highways officer. The same access strategy would be appropriate for any new development proposal.



Potential access location

A speed survey was undertaken in November 2016 using a radar speed gun as part of the previous Transport Assessment. The recorded 85th percentile speeds are shown in the table below. Manual for Streets parameters apply to streets with speeds up to 60kph (37mph). For higher speeds, DMRB parameters apply. Highway comments on the previous Transport Assessment required visibility splays of 2.4m x 90m, measured to the nearside edge of the carriageway. The access design shows that these visibility splays can be achieved.

3.4 Transport

A Stage 1 Road Safety Audit (RSA) of the proposed highway works was undertaken as part of the Transport Assessment in January 2017. The Audit highlighted the existing visibility splays from the site access are obscured by vegetation, and raised concerns regarding a lack of pedestrian crossing provisions. Therefore, in any new application, visibility splays would be kept clear of vegetation above 0.6m, and a new uncontrolled pedestrian crossing on Bedford Road would be provided.

Sustainable transport

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

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

Pedestrian catchments and local facilities



Wixam is a new town being built to the west of the A6. It consists of four villages, and the nearest one is Lakeview. Lakeview will provide local facilities such as a lower school, a supermarket, shops, a sports centre and play areas. These amenities would be 2km walking distance from the centre of the site.

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

As detailed in the highway comments on the previous application, the site needs to connect with the existing pedestrian facilities within the village. It is proposed to extend the footway from the eastern access eastwards to connect with the existing footway at the eastern edge of the Cawne Close, and complete the missing sections of footway further east. In this way there would be a continuous pedestrian route from the development into the village centre. The footways would be extended between the two access junctions on Bedford Road. They would also be extended west to the bus stop on the northern edge of Bedford Road.

In the previous application, a pedestrian/cycle crossing on Bedford Road was to be secured by a S106 contribution. There were also concerns raised about the speed of vehicles. These two issues can be dealt with by some traffic calming with central refuges. There are various locations where such features can be introduced, and they will be identified during the application process so they can be secured by condition.

PRoW



3.4 Transport

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

To the northwest of the site, a 3m wide footway/cycleway is provided from Bedford Road, under the A6 to connect with Wixam. To the east of the site, cyclists can connect to the John Bunyan Trail, which is a cycle route between Shefford to the southeast and southern areas of Bedford to the north.

The nearest bus stops that provide access to regular services are on Bedford Road, to the west of the site. The northbound stop is approximately 350m from the centre of the site and is marked by a flag and pole, a shelter and layby arrangement with timetable information.

Cycle catchment area

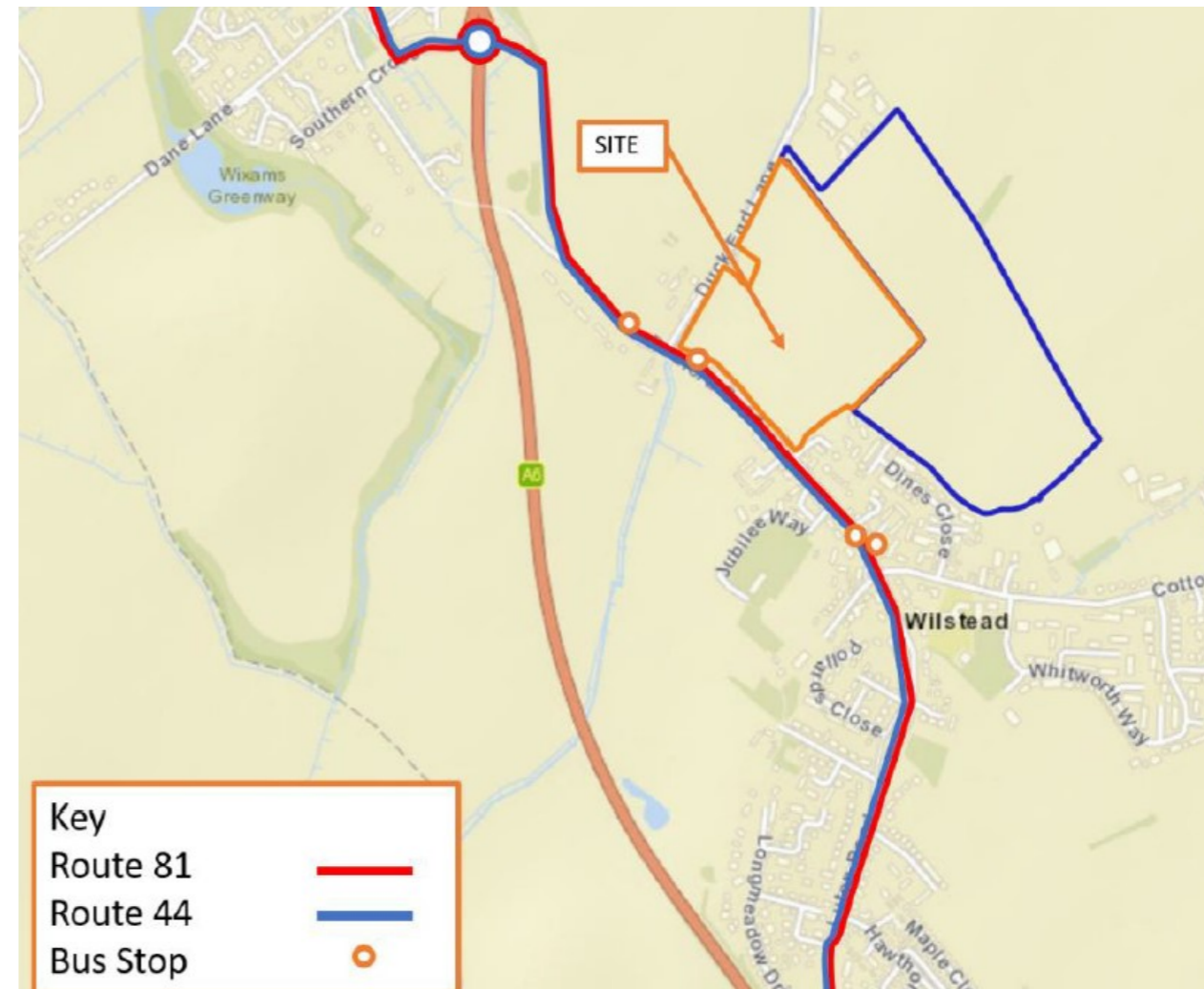


The stop is accessible via the southern footway along Bedford Road. The southbound bus stop is approximately 290m from the centre of the proposed development site, marked with a flag and pole arrangement and a layby that forms the start of the layby at the northwestern end.

This stop is accessible by using the southern footway along Bedford Road and crossing to the northern side. The bus stops serve the 81 and 44 bus services shown below. The 81 service operates through the day and during peak times. The 44 service routes from Bedford to Amphil via Wilstead and runs an hourly service throughout the day and during the peak times.

In summary, the site is accessible by all modes of transport, proportionate to the scale and location of the development. There is opportunity for pedestrian travel to access services within Wilstead and cycling and bus travel can be used to reach Bedford and surrounding areas.

Bus map



3.4 Transport

Traffic impacts

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

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

Overall, there is no reason to suggest the highway network could not accommodate the increase in traffic resulting from a development of up to 250 dwellings. Off-site mitigation would be examined using up to date traffic flows and modelling at the application stage



3.5 Flood Risk and Drainage

ADC Infrastructure have provided advice to inform the site promotion,

Most of the site lies within Flood Zone 1, which is classed as having a low probability of fluvial flooding (less than 1 in 1000 annual probability of river or sea flooding). Along the western boundary of the site there are areas of Flood Zones 2 and 3 within the low-lying areas; they cover approximately 20% of the total site area.

Return Period	Site Area (ha)	Runoff Rate (l/s)
QBar	6.95	23.0
1 in 1 Year	6.95	20.0
1 in 30 Year	6.95	55.3
1 in 100 Year	6.95	82.0

The areas of medium to high fluvial flood risk are associated with an IDB maintained ordinary watercourse (B9) that runs parallel to Duck End Lane. Mapping obtained from the local IDB of the drainage assets that they have responsibility to maintain.

The topographical survey shows that the watercourse emerges from a culvert beneath Bedford Road, before flowing as an open channel along the western site boundary and is culverted beneath concrete access ways for short sections as it passes the existing dwellings that back onto the site. The watercourse continues flowing north and is then culverted underneath Duck End Lane (via a 1200mm diameter culvert), and along the western side of the road.

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

The flood risks that may be posed to the site are summarised in the table above, with the indicative degree of risk and the site-specific factors that influence that risk.

Proposed mitigation

Due to the anticipated fluvial and pluvial (surface water) outlines, and in accordance with the NPPF guidance, it is recommended that a sequential approach is undertaken and the proposed dwellings are located on the higher land in the centre and east of the site, where the residual flood risk is low. The western areas of the site, with the highest risk of flooding, should be designated as areas of open public space and include any proposed SuDS features.

Surface water drainage

Existing discharge rate

The existing site is considered as greenfield and comprises of a single, large agricultural field parcel. It is assumed that surface water either soaks into the ground or runs overland towards the existing ordinary watercourse along the western boundary.

The rate of greenfield runoff from the site was calculated using the ICP SuDs method in MicroDrainage for various storm event return periods. Based on the illustrative masterplan from the previous planning application, there are significant areas of open green space that were included as part of the development design. A developable area of 6.95ha or approximately 75% of the total site was proposed for development, and this figure has been used to calculate the greenfield runoff rates associated with various return periods.

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:

- infiltration drainage techniques, such as swales and soakaways
- an open watercourse, river, or ditch
- a surface water sewer
- a combined sewer

The British Geological Survey (BGS) and the Soilsmap mapping give an indication of the underlying ground conditions. They suggest that site is underlain by impermeable soils that may limit the use of

3.5 Flood Risk and Drainage

infiltration. In due course, it is recommended that a ground investigation is undertaken, to include infiltration testing to assess whether there is any potential to infiltrate runoff into underlying soils.

As infiltration does not appear to be a viable option in managing runoff from the development, then preference should be given to the disposal of surface water runoff into the nearest open watercourse or drainage ditch. The ordinary watercourse adjacent to the western site boundary offers a suitable location to discharge runoff generated by the development, at an agreed discharge rate.

The topographical survey shows that the levels in the watercourse fall from south to north, with the lowest levels falling to 30.30m AOD, adjacent to the northwest of the site before it is culverted under Duck End Lane. From a review of the bed levels, there is potential for a restricted discharge to be made into the watercourse.

As part of the previous flood risk and drainage strategy, both the LLFA and local IDB were consulted. In terms of surface water discharge rates, the LLFA required that surface water runoff be restricted to either the existing greenfield runoff (QBar) rate or 2l/s/ha. The IDB advised that greenfield runoff rates for the site should be restricted to a rate of 4l/s/ha for the impermeable surfaces on-site. Based on a typical residential development consisting of approximately 50-60% impermeable surfaces, the IDB recommended rate would equate to approximately 2l/s/ha. Therefore, the proposed restricted discharge rate for the development is 13.9l/s (i.e. 2l/s/ha x 6.95ha), this is subject to further consultation and agreement with the local IDB.

In the IDB response for the previous application, they required an easement of 7m (measured from the bank top) on both sides of the watercourse, in which no development is permitted, to allow for access for ongoing maintenance of the watercourse. This distance has since been increased to 9m, following of the adoption of the latest Byelaws for the IDB in 2018.

Proposed surface water strategy

It is proposed to convey surface water runoff via a below ground, gravity conveyed surface water drainage network that will collect runoff from impermeable surfaces (roofs and highways) onsite and drain to a series of detention basins located along the western site boundary, where levels are lowest. Runoff will then outfall into the IDB watercourse at the proposed runoff rate of 13.9l/s subject to agreement with the IDB.

The developable area of the site is estimated to consist of approximately 60% impermeable surfaces

that covers a total area of 4.15ha. An additional 10% to account for urban creep, as specified in the LLFA guidance, was also included within the total impermeable surface area for the outline drainage design.

An indicative detention basin feature has been sized using the Micro Drainage Quick Storage Estimate module, to a standard of a 1 in 100 year plus 40% climate change storm event, in line with the typical requirements of the LLFA. The estimated total attenuation volume required to serve the proposed development based on the total site area is approximately 3,465m³ for a restricted discharge of 13.9l/s.

Based on the LLFA requirements, the surface water strategy should include a series of Sustainable Drainage Systems (SuDS) e.g. swales and detention basins. It is anticipated that the proposed detention basins in the west boundary will provide the necessary on-site attenuation, with a restricted discharge into the IDB watercourse. The detention basins should be located outside the Flood Zone 2 and 3 areas.

Proposed foul water strategy

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

- a foul water sewer
- a combined sewer
- a septic tank
- a cesspool.

The site is greenfield and has no foul water discharge at present. Sewer asset record plans provided by Anglian Water, show that there are no adopted sewer assets within the site, with the closest sewer assets being a 300mm gravity conveyed foul sewer that runs in a westerly direction along Bedford Road to the south.

Foul water shall look to drain via a gravity conveyed drainage network that will connect into the foul sewer in Bedford Road, via a new connection that will outfall into manhole 1901 at an unrestricted rate. This will be subject to further consultation with Anglian Water to assess the viability of the connection into the existing foul sewer.

A review of the on-site levels indicates that it would be difficult to drain by gravity foul effluent from the western and central areas of the site, due to levels being below the adopted foul drainage network in Bedford Road, and so a pumped solution may be required.

3.6 Heritage

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

Designated Heritage 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 inter-visible 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.

The site is not inter-visible with any other designated heritage assets (i.e. Scheduled Monuments, Conservation Areas, Registered Parks and Gardens etc) and there is no indication that the site has any historic functional association with any of the identified designated heritage assets in the search area.

Non-Designated Assets

The data provided by the Bedfordshire HER for the 2017 desk-based assessment included 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). The findspot plotted within the site (MBB21268) does not represent an accurate location and there is no evidence confirming its actual location within the site.

There are a further 63 Historic Environment Record Monuments recorded in the surrounding 1km search area.

There is one record of **Prehistoric** activity within the study site; cropmarks indicating a ring ditch with probable entrance and two linear features within the north-western part of the site (HER3125), although the geophysical survey suggested it was more likely that these cropmarks were caused by sands and gravels and their extraction.

The records within the wider search area include several areas with cropmarks (all interpreted as enclosures; HER 16553, 16564 and 3123), a number of flints of Palaeolithic and Neolithic date (HER 324) and the line of a possible prehistoric Ridgeway from Cranfield to Bromham (HER 7303), 670m south of the site at its closest point. The cropmark and fieldwork evidence recorded on the HER within the site and surrounding search area would suggest that the landscape was fairly widely exploited in the mid to late Prehistoric period. However, the geophysical survey of the site suggests that the cropmark

evidence from within the site is misleading. The topographic location would be typical for Prehistoric settlement activity, but the absence of credible features on the geophysics suggests that this site was not settled in Prehistory or indeed at any other date. The site is, therefore, considered to have a low potential for significant Prehistoric archaeology.

The HER contains two records of **Roman** date located within the study site; cropmarks indicating a ring ditch and two linear features within the north-western part of the site (HER3125), with Roman pottery found nearby. The geophysical survey suggested it was more likely that these cropmarks were caused by sands and gravels and their extraction. The conjectured line of a Roman road from Irchester to Kempston (HER 58) is recorded on the HER running north/south across the eastern part of the site. However, the route is somewhat doubtful; some of the boundaries have been found to be Post-Medieval in origin, and there is no indication of the road on aerial photos of Kempston parish.

The geophysical survey of the site did not reveal any anomalies relating to the road. It is difficult at present to make clear sense of the data available. Romano-British settlement features are typically readily identifiable on geophysics and the absence of features of this date is significant. Romano-British pottery does occur on sites as a result of manuring etc, but the coincidence that this was found on a high point, favourable as a settlement location, is curious. Significant settlement related features are unlikely within the site, although some activity of this date on site, or in close proximity, is very likely.

There are no records of **Saxon** or **Medieval** date within the study site and based on the geophysical survey and the site's location within the agricultural hinterland of Bromham, it is considered to have a low potential for significant, i.e. non-agricultural, remains dating to these periods.

There is one record of **Post-Medieval/Modern** activity located within the site; part of a mill pond (HER 2621) is recorded in the southern part of the site, although no earthworks were visible at the time of the site visit, it is not depicted on the 1798 or later maps, and the geophysical survey did not identify any remains relating to it. It seems most likely that this feature is incorrectly mapped on the HER and was not present on the study site.

The remainder of the Post-Medieval and Modern records within the search area are of a well-defined extent that add little to the understanding of the study site's archaeological potential. The site remained predominantly as agricultural land throughout these periods and is considered to have a low potential for significant Post-Medieval and Modern evidence.

3.7 Noise and Air Quality

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

Noise Constraints

The potential noise constraints in terms of the existing and proposed noise sensitive receptors, will be the noise from traffic using the local highway network. While Duck End Lane and Bedford Road border the site, the main road in the local area is the A6 running north from Luton to Bedford and located approximately 250m west of the site boundary.

The future development 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 2 residential properties (3 and 5 Duck End Lane) which are located approximately 80m north of the proposed site boundary. Two residential properties are located in the middle of the western site boundary on Duck End Lane, with further receptors on the opposite side of Duck End Lane but limited to the south western boundary. Further residential receptors are located in close proximity to the south eastern corner of the proposed site, located off Cawne Close and also on the opposite side of Bedford Road.

A search of the area has identified that H. Maskell & Son operate an industrial site located just north of the north east boundary. The company are engineers and boiler manufacturers, but the operation includes plasma cutting, mobile welding and metal fabrication and noise from these operations could have an adverse impact on the future receptors of the development.

Noise Assessment Approach

The future noise assessment will assess if a future development is likely to give rise to any significant adverse impacts upon the existing or proposed noise sensitive receptors within the immediate surrounding area. The assessment will include a consideration of the construction and operational phases of the development. The noise from the operational activity of H Maskell & Son will also need to be considered and a specific noise assessment will be undertaken.

Mitigation

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

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. Without any knowledge of the typical use of the adjacent commercial site, it is not possible to predict the potential for adverse impacts. However, the presence of the existing residential properties, located between the commercial site and the proposed development, would suggest that noise levels are not of a level to cause nuisance.



Air Quality Constraints

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

3.7 Noise and Air Quality

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

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



Mitigation

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



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

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Framework Plan

4.0 Framework Plan

The Framework Plan prepared by Vista Architecture and Urban Design has been informed by a thorough understanding of the context within which the proposed development will sit. In addition, comments made by professional officers during the determination of the previous planning application have been taken into account. The constraints and opportunities provide a useful basis for the formulation of a design concept and are summarised below:

Constraints

- Existing hedgerows around the perimeter of the site;
- Proximity of residential dwellings off Cawne Close and Duck End Lane
- Veteran tree in the north-western corner of the site;
- Adjacent agricultural/commercial uses to the north west corner of the site.
- Grade II listed buildings along Duck End Lane;
- Parts of the site within flood zones 2 and 3.

Opportunities

- Retention of existing hedgerows around the site to be retained – the retention and enhancement of the existing vegetative structure which defines the site boundaries will maintain the verdant character of the site and its setting;
- Whilst some vegetation will be removed to facilitate the primary and secondary accesses into the site from Bedford Road, along the southern boundary; new planting would be established behind sight lines to ensure that a safe access is achieved as well as maintaining a verdant street scene;
- The potential to extend the footway eastwards to connect with the existing footway on the eastern edge of Cawne Close and complete the missing sections of footway further east to allow a continuous pedestrian route from the development site into the village centre would be explored;
- The potential for new footpath links from the site to the permissive right of way along Duck End Lane along the eastern boundary and to Bedford Road to the south will be explored.
- The proposals will be outward looking to ensure properties front onto the public open space within the site and outwards around the northern and eastern boundaries to create an attractive and active building frontage and to provide passive surveillance to the areas of public open space as well as a suitable interface with the wider landscape;
- Footpath links throughout the site, within landscaped green corridors will be provided providing convenient links to Bedford Road, Duck End Lane creating a permeable and sustainable development.
- Provision of a children's play area within an area of public open space in the north western corner;
- The incorporation of a robust scheme of landscaping that would reinforce the existing landscaped setting ensuring that the proposals can be integrated with a notable area of public open space to































the north western boundary that would provide a breathing space between the proposed development and the listed buildings located along Duck End Lane. This would comprise a landscaped buffer, which in itself results in opportunities to establish native wildflower grassland, shrub and trees that together provide habitat enhancements;

- Creation of an enhanced and defensible edge to the site and overall settlement to the north east – the proposed landscape strategy retaining and enhancing site boundaries, set behind a linear public open space. The naturalised planting will soften the perceived built edge and create an appropriate transition to the wider countryside;
- Incidental open spaces, including around the existing remnant hedgerow within the site will assist in breaking up the perceived built environment and provides opportunities for feature planting that will contribute to placemaking. Green corridors through the development provided as part of the site wide green infrastructure will provide opportunities to establish native wildflower grassland, shrub and tree planting to deliver habitat enhancements;
- Provision of sustainable drainage/attenuation features to be included within the areas of open space at the north western corner of the site. This will provide a drainage solution and provide opportunities for a mosaic of habitats to include native wetland planting as part of the wider biodiversity enhancements across the site. It will also reinforce the high quality landscape setting to the proposed development to be located outside of the flood areas.
- Development will be set off from boundary nearest to Cawne Close and Duck End Lane to ensure privacy for existing and future occupiers.
- Potential area for allotments;
- Substantial buffer to the off-site veteran tree at the north-east corner of the site and;
- Green pockets of incidental open and amenity space within the built form to provide areas which are typical features of village residential development.

These significant opportunities will result in the formulation of a detailed layout for the site which would be comparable to, and in harmony with, the established character of Wilstead in terms of design and density. The robust landscaping and planting strategy will ensure that the development of the site will integrate into its county side setting in a positive way to enable the provision of up to 220 dwellings, without eroding the gap between the village and Wixams.

4.0 Framework Plan



-  Gross site area 9.08 Ha.
-  Primary access into site from Bedford Road. Where vegetation removal is necessary along the southern part of the south western site boundary to accommodate access, new planting would be established behind sight lines to ensure that the verdant street scene is maintained.
-  Secondary access into site from Bedford Road. Where vegetation removal is necessary along the southern part of the south western site boundary to accommodate access, new planting would be established behind sight lines to ensure that the verdant street scene is maintained.
-  Potential to extend the footway eastwards to connect with the existing footway at the eastern edge of the Cawne Close, and complete the missing sections of footway further east. This would be a continuous pedestrian route from the development into the village centre.
-  Potential footpath link from the proposed development to the permissive right of way along Duck End Lane along the eastern boundary.
-  The proposals seek to achieve an "outward looking" development, with properties fronting onto the public open space. The outward facing properties will create an attractive and active building frontage and provide passive surveillance to the areas of public realm within the development.
-  The proposals seek to achieve an "outward looking" development, with properties fronting onto the public open space rim around the northern and eastern boundary of the site. The outward facing properties will create an attractive and active building frontage and provide passive surveillance to the areas of public realm within the development. It will also provide a suitable development interface with the wider landscape.
-  The proposals seek to achieve an "outward looking" development, with properties fronting onto the linear public open space around existing retained hedgerows within the site. The outward facing properties will create an attractive and active building frontage and provide passive surveillance to the areas of public realm within the development. It will also provide a suitable development interface with the wider landscape.
-  The proposals seek to achieve an "outward looking" development, with properties fronting onto the linear public open space along Bedford Road. The outward facing properties will create an attractive and active building frontage and provide passive surveillance to the areas of public realm within the development. It will also provide a suitable development interface with the wider landscape.
-  Potential footway link to Bedford Road.
-  Potential vehicular and pedestrian access to phase two land along north eastern boundary.
-  Permissive right of way along Duck End Lane - opportunity to provide cycle and pedestrian links from development site.
-  Potential footpath links within landscaped green corridors through the site, providing convenient links to Bedford Road, Duck End Lane creating a permeable and sustainable development proposal.
-  Potential pump station location.
-  Opportunity to provide a children play area within public open space to north western corner.
-  Existing bus stop off Bedford Road at south west corner of site.
-  Existing hedgerows and trees around the site perimeter to be retained. The retention and enhancement of the existing vegetative structure which defines the site boundaries will maintain the verdant character to the site and its setting.
-  The proposals seek to incorporate opportunities for a robust scheme of landscaping that would reinforce the existing landscaped setting, ensuring that the proposals can be integrated and with a notable area of public open space to the north western boundary and would provide a breathing space between the proposed development and the listed buildings located along and around Duck End Lane. This would comprise a broad landscape buffer, which itself results in opportunities to establish native wildflower grassland, shrub and trees that combined provide habitat enhancements.
-  Area of public open space along the north western boundary of the site. The POS will include the retention of the existing hedgerows and additional native tree and shrub planting to establish a high quality rural edge to the development.
-  Creation of an enhanced and defensible edge to the site and overall settlement to the north east, with the proposed landscape strategy retaining and enhancing the site boundaries, set behind a linear public open space. The naturalised planting will soften the perceived built edge and create an appropriate transition to the wider countryside.
-  Incidental open spaces, including around the existing remnant hedgerow within the site east in breaking up the perceived built environment and provide opportunities for feature planting that will contribute to placemaking. Green corridors through the development provided as part of the site wide green infrastructure providing opportunities to establish native wildflower grassland, shrub and tree planting to deliver habitat enhancements.
-  Sustainable drainage / attenuation features to be included within the POS at the north western corner of the site. The sustainable drainage solution provides opportunities for a mosaic of habitats to include native wetland planting as part of the wider biodiversity enhancements across the site. It will also reinforce the high quality landscape setting to the proposed development, to be located outside the restrictive flood zone areas.
-  Amenities of existing dwellings off Cawne Close and Duck End Lane respected with suitable off-set distances from proposed development.
-  Proposed native tree and hedgerow planting to northern boundary will provide opportunity for ecological enhancement and ensure satisfactory integration of the built form.
-  Public Open Space along the western boundary providing useable parkland, play areas and potential allotments areas.
-  Proposed areas of residential development.
-  Substantial buffer provided to off-site veteran tree at the north east corner of the site.
-  Approximate line of Flood Zones 2 and 3 along the western boundary to be designated as areas of open public space and include any proposed SuDS features.
-  Green pockets of incidental open and amenity space within the built form to provide areas which are typical features of residential development within a village location.
-  Adjacent agricultural / commercial use to north western corner of site.



Deliverability

5.0 Deliverability

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

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

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

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

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

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

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

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

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

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

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



Conclusion

6.0 Conclusion

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

Whilst the Bedford Local Plan 2030 has been adopted as recently as January 2020, it contains important provisions within Policy 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 Bedford Road as a consequence of Wilstead containing a wide range of shops, services and facilities commensurate with its position in the current settlement hierarchy identified as a Key Service Centre.

Based on the previous call for sites exercise, there are a range of sites available at Wilstead 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 Bedford 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 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 9.2 hectare site could deliver approximately 220 houses, whilst having regard to the above mitigatory measures whilst also deploying the following design and layout principles;

- Outward facing development to provide passive surveillance
- Robust landscaping strategy to include retention of boundary hedgerow and trees where possible and significant bolstering as well as defensible edge to the settlement boundary;
- Provision of sustainable drainage systems which also includes opportunities to provide a wide range of biodiversity and habitat enhancements;
- Connectivity with the surrounding footpaths
- Provision of on-site public open space in the form of a large area and pockets within green corridors including children's play;
- Landscaping buffer to the off-site veteran tree and;
- No erosion of the gap between the village and Wixam's.

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

More than a planning consultancy

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