

## **Site ID: 765 - Land west of Howbury Hall and east of Asgard Drive, Renhold**

The following clarifications and additional information is provided in response to the Call for Sites Assessment proformas.

### **Site Options**

Firstly, as part of the original Site 765 submission, two potential options were highlighted. Option A was a housing only scheme whilst Option B proposed to accommodate a new for primary school alongside the proposed housing.

The site assessment does not appear to specifically consider both options i.e., the school is not mentioned. Having raised this matter with Policy Team Leader Kim Wilson we are advised that the Council is aware of both options and is in possession of both submissions. We query therefore whether a second assessment including the school should be included i.e., a Site 765(a) and 765(b).

Notwithstanding this and for clarity Option B including the school is offered on the basis that it is understood that Renhold Primary School is at or approaching capacity. It is included to ensure that if the site were to be favoured for residential development, education capacity should not then be seen as a constraint to allocation as a solution is available in this regard.

Clearly if education capacity in the area is such that a new school is not required then the school site would not be needed and Option A would progress rather than Option B.

### **Ecology (2a, 2b, 2c, 2d)**

The site proforma notes at criterion 2a that the site is 'within or adjoining a site of nature conservation importance'.

Having review DEFRA's Magic map and the current Policies Map, it is unclear what site is being referred to as the nearest statutory designated ecological site is the SSSI at Tilwick Meadow which is over 5 kilometres away, whilst the nearest Local Nature Reserves, Putnoe Woods and Mowbury Hill are both over 2 kilometres away.

A local County Wildlife site is located to the southwest but separated from the site by St Neots Road.

Criterion 2b advises that it is unclear whether protected species may be impacted by development at the site.

In response to this query Aspect Ecology have been instructed to prepare an initial Preliminary Ecological Assessment (PEA) and have visited the site as part of this work. The Aspect report accompanies this submission.

As will be noted this confirms that the land to the north of the proposed site (the main body of the site) has little or no ecological value as it is quite intensively farmed. THE PEA noted that the boundary hedges and trees do provide reasonable ecological potential as habitat corridors but these are constrained by the tight nature of the farming up to them.

Significant scope exists to build in wider buffers to these boundaries and so enhance their ecological value.

A small portion of the promoted site comprises degraded low quality parkland. The grass species in this area is noted as poor and there are no veteran trees. The report therefore notes the potential to enhance this area as part of any development.

The final part of the site comprises the area of trees at the southern end through which the proposed access road would be taken. This is again noted as poor in ecological terms as pig rearing in this area has removed any understorey elements of interest. Again, therefore as part of any development significant scope exists to improve the biodiversity value of the area.

The report makes clear that overall, there are no ecological grounds to resist the development of the promoted site.

### **Heritage (4a)**

Criterion 4a states that the *“The proposal has the potential to cause harm to heritage assets”* and goes on to identify that this harm may range from ‘low to high’.

This appears a fairly generic comment which is made in respect of the vast majority of the promoted sites. It is not clear from the assessment work available to view what heritage assets the assessment is referring to.

However, it is of course noted that there are a series of listed buildings within the Howbury Hall estate. These are all set some distance from the proposed site and separated from it visually by bands of trees.

In addition, as part of the site assessment work the Council requested that the applicant provide a Heritage Impact Assessment Report (HIA). This was prepared by Albion Archaeology and submitted to the Council in March 2021.

The HIA is not referenced within the site assessment proforma.

The HIA confirms that the development of the site as proposed would not result in any materially harmful heritage impacts and this matter should not therefore be held as a constraint to the sites allocation.

### **Settlement Form (8b)**

Criterion 8b states that *“The site is more than 0.5 miles from a defined settlement policy area or the built form of a small settlement”* however it is also observed at criterion 1 that the site adjoins the urban area. It therefore appears clear that the site is adjacent to a defined settlement policy area (i.e., the urban area).

In this regard the site performs well in terms of its relationship with the favoured and most sustainable spatial strategy option (2a)

### **Highways (15e & 15f)**

The proforma discusses highway matters at 15e and 15f and appears to indicate that the proposed access arrangement is unclear and / or could result in some capacity issues.

This is not the case.

A Highway and Access Appraisal prepared by consultants TPA was provided with the call for sites submission.

This shows two detailed potential roundabout access options at Appendix A and Appendix B of the report. The designs are also based upon transport assessment and modelling of the volume of traffic and current capacity of St Neots Road.

The submission makes clear that the favoured option is that at Appendix A which is located to the south west corner of the estate and would retain the new access away from the hall and the important parkland areas.

For clarity therefore the submitted information clearly demonstrates that an appropriate access for the site can be delivered and there are no capacity issues.

A general comment is made in the highway assessment comments that the proposed access road would be approximately 300 metres long before accessing the housing area.

As discussed above, two options for the site development have been prepared (A and B). Whilst Option A retains the housing development further north and so with a longer length of access road before houses would be developed, Option B includes housing development closer to the access with a length of approximately 80 metres from the highway to the first house.

Whilst the length of the access drive is not considered to be an issue which may be held to lessen the attractiveness of the land as a potential site allocation, should the Council hold any concerns in this regard the Option B layout addresses this matter.

An additional plan is also now included with this submission showing the location of the site relative to a number of existing footpaths and cycleways and existing bus services in the area.

A bridleway runs along the sites western boundary and so provides direct access to the east side of Bedford via Asgard Drive to Norse Road.

Bridleways also run to the south and east of the site, connecting with various adjacent public footpaths which in turn link to Renhold to the north.

There are also dedicated cycleways connecting to the Lidl, Tesco and Waitrose stores to the west without need to cycle on roads. The cycleways also provide excellent access to neighbouring employment areas and through to Bedford Station.

There are bus stops on Norse Road at the entrance to Asgard Drive within 600 metres of the site. There is a regular service (Route 5 every 15 minutes during weekdays), into Bedford and also hourly services (Route X5) between Cambridge, Milton Keynes and Buckingham.

There is also a local service connecting the area with the nearby villages (Route 27).

As will be noted therefore good quality connections already existing between the site and existing transport infrastructure.

## **Conclusions**

The submitted site offers substantial potential for allocation as a housing site.

The emerging local plan strategy seeks to focus development within the urban area, directly adjoining the urban area and along the A421 corridor. This site directly adjoins the existing urban area and is located within excellent proximity of and with good access to the A421 corridor.

The sites allocation would fit squarely with this emerging strategy.

There are no technical constraints to the development of the land. As part of the initial call for sites submission, and now this updated representation, cumulatively the following technical documents have been supplied:

- Preliminary Ecological Appraisal
- Heritage Impact Assessment
- Highway Impact Assessment and detailed Access options
- Tree Survey & Arboriculture Assessment

In addition, two high level master plans have been prepared showing how the site could come forward as a residential only allocation (Option A), or if required to include the delivery of a new Primary School (Option B).

The site is owned and controlled by a single entity, the Howbury Hall Estate. No third party land or agreement is required to facilitate the development as proposed.

Should the Council have any further questions or queries regarding this site please do not hesitate to contact us.