

Staploe Parish Council Representations for Call for Sites

Dennybrook

Land west of Wyboston (Dennybrook) Site 977

Land west of Wyboston (Dennybrook) is considered the least preferred option and should be discounted as a sustainable location for development by Bedford Borough Council. The following comments and observations relate to the Call for Sites submission by Taylor Wimpey for a 'new settlement'.

Under form ID: 977, submissions have been made for a new settlement covering around 750 Hectares of land, and providing between 7,500 – 10,150 dwellings (35 dph). BBC have identified the site as a potential 'new settlement' though providing around 2,500 new homes.

The proposed site at Dennybrook falls mostly within the Parish of Staploe. The parish is entirely rural with many narrow, single track roads and no settlement policy area. It is all on grade 2 (high quality) agricultural land and it is highly valued for its peace, quite, open countryside views and rural setting by its residents as evidenced by a Neighbourhood Plan survey conducted in early 2021. Clearly, any significant development within the Parish would make a permanent change to the landscape and the setting of the small hamlets and rural nature in the locality. Such physical changes cannot be reversed, and the Council would need to be satisfied through a thorough review of the supporting documents to the site submissions that adequately address the impacts, and in terms of achieving sustainable development – in line with Paragraph 16 of the NPPF and section 39(2) of the Planning and Compulsory Purchase Act 2004.

Housing need has been identified through the Council's LHN. Using the process set out in the Planning Practice Guidance "Housing and economic needs assessment" (MHCLG – updated December 2020) the minimum annual LHN figure is 1,305 dwellings per annum. This equates to 26,100 dwellings across the period 2020 – 2040. However, existing committed sites and windfall provide a figure of 13,000 new homes. This provides a figure of 13,100 additional dwellings over the plan period. It is noted that BBC that the housing is 12,500 as a minimum. Regardless of the two figures are proposed, the strategy of option 2a (including 2,500 homes at Little Barford) meets the Council's housing requirement and negates the need for Dennybrook as a new settlement.

When looking at the spatial approach to locating new development, the proposed site at Dennybrook would be located within close proximity to St Neots, with a possible merging into Wyboston and the hamlets of Honeydon and Begwary would be engulfed by the development. Given the scale of the proposed development at Dennybrook, even at 2,500 dwellings, there would be a potential coalescence to the existing settlement of St Neots. Spatially, this would be contrary to the Council's adopted Local Plan which seeks to prevent coalescence of settlements. In addition, policy 37 of the Council's adopted Local Plan makes clear that developments need to '*Protect the landscape setting and contribute to maintaining the individual and distinct character, and separate identities of settlements by **preventing coalescence**...*'. It should also be taken into consideration that St Neots is experiencing its own strategic growth with an eastern extension 3,265 dwelling and 20 Ha of employment land over the plan period. Therefore, a new settlement directly to the west of the existing settlement of 2,500 would significantly increase the size of St Neots and may affect delivery rates for housing due to competing sites.

The transport impacts are acutely felt for this proposed new settlement. It is clear that the proposed development at Dennybrook would be a car reliant settlement. The proposal will not benefit from a choice of sustainable modes of transport as opposed to other developments, such as urban extensions and the proposed development at Little Barford. Little Barford offers a varied choice of sustainable modes of public transport, including the possible linkage to the East West rail station south of St Neots. It is anticipated that there will be limited employment associated with Dennybrook with commuting considered necessary to nearby employment areas, for example, south of St Neots, Bedford or Cambridge via train. This would be contrary to sustainability objectives identified by BBC, and contrary to paragraphs 73, 104, 105, 106, and 110 of the NPPF, not to mention existing policies within the adopted Local Plan, namely Policies 2S, 87, 88, and 90S. In addition, the Dennybrook site does not align with a strategic transport corridor growth strategy, including rail.

In highways terms, it has been identified previously that Parish of Staploe is rural in character, with most of the road network narrow and single track. The inclusion of 2,500 dwellings (or over 10,000 according to the site promoted) would require significant infrastructure interventions, including the substantial widening of existing roads and junctions, which would lead to an urbanised appearance it what is a tranquil and idyllic countryside setting. Bedford Borough Council confirm within their assessment of the site submissions, that junction or highway capacity issues are a 'serious capacity constraint'.

These representations are supported by a Highways Technical Note (Appendix 1) which has reviewed the Transport Modelling undertaken by AECOM in support of the strategic options in the Draft Local Plan 2040. The Technical Note considers that the Transport Modelling is fundamentally flawed. In summary, no validation or calibration of the traffic model has been undertaken, leading to significant discrepancies. Furthermore, within the Transport Model documents, it is quoted that average departing trips are 20 to 25 vehicles. When looking at the development scenario with the transport model of 2,500 – 10,150 dwellings, and using a departure rate of 0.25 departure trip rate, this results in 625 to 2,538 departing trips all of which would be home based departure trips. The model assumes 5 loading zones which therefore means there could be 125 to 508 vehicles per loading zone. This is significantly higher than the 20 to 25 outbound vehicles used by the AECOM model, assuming they have loaded it per node. AECOM may argue that the reduction is due to sustainable modes of transport being used. However, it is made clear within paragraph 4.6 that the site offers very little in terms of alternative sustainable means of transport. Accordingly, the Transport Modelling by AECOM cannot be wholly relied upon.

The landscape setting for the Parish of Staploe is one of a rural character, containing small hamlets, interspersed agricultural buildings, small holdings and arable agricultural land. As mentioned above, the roads are narrow and winding, and contribute to the rural setting. This form of land extends from the A1 to the east to Church End, Colmworth to the east, down to Colesden to the south, and up to the Bushmead Road to the north. The landscape character is depicted within the Council's Landscape Character Assessment (LCA), updated October 2020. The wider Parish of Staploe falls within the Thurleigh Clay Farmland character area (1D). Within the 'evaluation' section at page 55 of the LCA it notes that potential future change could include Small scale development in villages which could lead to loss their distinctive character/ 'Ends'; Road upgrades affecting rural road character; Suburbanisation of villages. This would suggest that even relatively small changes would affect the rural setting of the area. Moreover, the proposed landscape strategy for the area as identified within the LCA is to 'enhance' elements of the landscape. The introduction of 2,500 new dwellings would

significantly and permanently erode the rural character of the Parish, contrary to Paragraphs 20, 153, 174, and 175 of the NPPF and policy 37 of the adopted Local Plan.

The Dennybrook area includes a number of roadside nature reserves which contain the rare Bath Asparagus, sulphur clover and crested cow wheat. In addition, the hedgerows are a haven for birds and wildlife such as the rare Small Eggar Moth. The fields are valued breeding sites for corn buntings, skylarks and partridge and there are a very high number of apex predators such as badgers, foxes, red kites etc. which suggest that wildlife is thriving.

There are also several Grade II Listed Buildings located within the Parish of Staploe, and would be affected by the proposed development at Dennybrook. It is evident that the Council's assessment to Call for Site states *'The proposal has the potential to cause harm to heritage assets. This harm may range from low to high. There may be options to avoid, reduce or mitigate this harm and where sites have not been ruled out altogether for other reasons, further assessment will be undertaken to more fully explore impacts on significance and options for harm reduction and mitigation. This further assessment may ultimately lead to the conclusion that the site should not be allocated.'* It is assumed by the above comments that further assessments are required before the site can be considered further as an allocation. It is clear that the existing Listed Buildings are dispersed throughout the area of the proposed development, causing potential impacts to their setting.

A further point to consider is that most of the land covered by the Parish of Staploe is Grade 2 agricultural land as identified by the Agricultural Land Classification. Paragraph 174 (b) of the NPPF makes clear that planning policies should contribute to and enhance the natural and local environment by: *'recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the **best and most versatile agricultural land**, and of trees and woodland...'* Grade 2 agricultural land is considered to be the best and most versatile agricultural land and would be applicable in this instance.

In addition to the above, the Sustainability Appraisal scoring for the proposed new settlement of Dennybrook identifies it as scoring lower than Spatial Option 3a. this spatial option was effectively discounted at the 'Issues and Options' consultation stage.

Staploe Parish Council believe that such a large development would increase the flood risk in St Neots because there are several brooks which feed into the rivers just upstream of St Neots. St Neots has experienced significant flooding – most recently in August 2020 and December 2020. The brook in Honeydon and Colmworth Brook both flooded at these times. Building on this large area of land would increase the surface water runoff and increase the flood risk in Honeydon and in St Neots.

The residents of Honeydon and Begwary would be engulfed by this development. These small hamlets would entirely lose their identities. Residents chose to live in these locations for their peace and quiet and rural character. Many keep livestock and are concerned that this may no longer be possible adjacent to a new town. Valued local views would be lost – across towards Colmworth and the church but also between Begwary and Tithe Farm and many other valued open rural views.

Residents of Staploe and Duloe would be affected by a huge increase in traffic through their hamlets and on the Bushmead Road.

Overall, the land west of Wyboston (Dennybrook) does not offer a truly sustainable form of development, and thereby contrary to policies contained within the NPPF and of the Council's

adopted Local Plan. Accordingly, the proposed new settlement should be discounted when considering sites for allocation going forward to the pre-submission draft Local Plan.

Cobholden and Manor Farm – response similar to Dennybrook

Duloe Field – as above but add that the access is poor and there is flooding at the bottom of the hill.

Top Homes and Flints Field – as above but add that this would prevent any improvements / upgrades to the A1 as it is adjacent to the road.

Little Barford

We support development of this site. It is adjacent to the urban area and to the likely location of the new East West rail station. It therefore provides options for genuinely sustainable transport as both stations in St Neots are likely to be within walking / cycling distance. The land does not flood and has fewer water courses than Dennybrook so there would be less impact on flooding in St Neots. It is also a smaller site so it would not grow into a new town of 10,500 homes as Dennybrook would. A much larger development such as Dennybrook would have a significant impact on St Neots and its services whereas Little Barford is smaller and would have a lower impact on the town. It is also on the side of the St Neots where strategic, planned growth is already happening (Loves Farm and Wintringham Park to the east), unlike Dennybrook which is positioned to the west where the A1 has always provided a clear dividing line between urban to the east and rural land to the west.

Much of the site appears to be grade 3 agricultural land.

Little Barford has good connectivity to the A428 (existing and new) and A1 as well as good access to facilities in St Neots such as Tesco, the leisure centre, Ernulf school.

Twinwoods

We support development of 70ha of this site which is brownfield land as an alternative if Little Barford is not suitable (eg. if the East West rail line uses some of the site). At 35dph this could provide 2450 homes which is sufficient to support option 2b with a new settlement if Little Barford was not an option due to the railway. Brownfield sites should be used in preference to greenfield sites. We recognise that there are problems with the A6 into Bedford but we believe these issues need to be resolved even with the development proposed for the 2030 plan and to enable residents from the north of Bedford to access the new east west rail. Therefore a new settlement of 2450 homes at Twinwoods would provide the infrastructure funding for this. Sustainable transport could be provided via a parkway station or guided busway.

The area does not flood, and it is distinct from local villages so there is no risk of coalescence or loss of identity of existing settlements or villages. Development here would support Bedford town centre.

Colworth

This area is a green field site but it is lower grade agricultural land than Dennybrook. The site was supported by Sharnbrook Parish Council when put forward in the previous 2035 draft local plan. If sustainable transport could be provided eg. via a guided busway to the new east west rail station and town centre then this site could provide a suitable option.