

Local Impact Report

Prepared by Bedford Borough Council

August 2021

1. Purpose of the Report

1.1 This report is prepared by Bedford Borough Council and provides a brief evaluation of the key local impacts of the proposed Black Cat to Caxton Gibbett Road scheme. The report has been prepared in accordance with the Planning Inspectorate Advice Note on Local Impact Reports and the published guidance of the Planning Officers Society.

2. Assessment of prospective impact of the project

A. Highways and Transportation

Strategic Highway Impact

Bedford Borough Council (BBC) believes the scheme to be a vital component of the strategic road network and one which will alleviate the poor performance of the current route. The scheme will provide an essential link which will enhance opportunities for economic growth and housing delivery, and improve conditions for local communities. The proposed scheme will reduce travel time between Bedford (and all points west) and Cambridge and will thus support the potential for economic growth, and the ambitions of the Ox- Cam Arc. The Council considers that strategic connectivity between Oxford / Milton Keynes and Bedford to Cambridge will be improved.

The demise of the concept of the Oxford Cambridge Expressway means that alternative solutions to improve east-west connectivity will be required, particularly west of the M1. However the Council is pleased to see the continuing commitment to the A428 Black Cat to Caxton Gibbet Improvement, which was originally considered part of the Expressway, for the reasons mentioned above.

The proposed scheme is supported by the Borough Council as a means to reduce significant congestion and delay at the Black Cat roundabout, and to improve conditions for local residents, particularly those in villages west of the A1 where 'rat running' is a factor. The scheme will also bring safety improvements to all road users by closing multiple direct accesses to the A1 and replacing them with a dedicated access road, and by improving the access to Kelpie Marina.

Bedford Borough Council has supported improvements to this stretch of highway for many years. As the former highway authority, Bedfordshire County Council worked with adjacent local authorities to press for local improvements between Bedford and Cambridge. The former County Council fully supported delivery of the Great Barford Bypass, opened in 2006, and the Borough Council supported the more recent improvements to the Black Cat roundabout junction which were completed in 2015 (check). It was noted at the time that both these recent improvements, while welcomed, provided only a temporary solution at the Black Cat roundabout.

Impact on Local Communities

From a highway perspective, the impact of the scheme on local communities is expected to be positive overall. At the moment, local communities in Wyboston, Chawston, Roxton, Little Barford and Great Barford are adversely affected by traffic conditions on the A1 and A428. Residents are exposed to disturbance from increased numbers of vehicles using local roads if there are delays on the trunk roads. Closure of direct access points to the west of the A1 in Wyboston, and improved access onto the new junction at Black Cat will encourage traffic to stay on the main line and not divert through local communities.

Users of Kelpie Marina will have a safe access point from Roxton village rather than an entry to / exit from the fast running lane of the A1. The new link road connecting to Roxton Road will replace all direct access onto the A1 in west Wyboston. Properties to the east of the A1 in Wyboston will have their direct A1 access replaced by a link road which connects to the new three tier junction at Black Cat. In these cases, the safety benefits of the new arrangements are considered to offset the disbenefits of additional journey length and time.

The scheme is not expected to alter community severance issues which may be considered to be present in Wyboston. It is likely that speeds on the A1 through Wyboston will increase which could deter pedestrian and cycle movements between the two sides of the village.

The impact of noise and pollution on local communities are covered elsewhere in this report.

Impact on local highways

We expect the impact of the scheme on the local highway network to be mixed. The longer term benefits are reduced rat running through the villages west of the A1, and on the C44 through Great Barford. However, the potential disadvantages include likely traffic increases on some local roads around Wyboston, Chawston, Little Barford, and Great Barford particularly through the construction phase. We welcome the opportunity to keep construction traffic monitoring under review throughout the construction period.

We also note that some local junctions along the A421 in Bedford will experience increased traffic on some arms which in some cases will lead to additional delay. At some of these junctions with the A421, not all local junction arms have been tested and so the impact of the scheme remains unclear. The Council notes that without some form of mitigation in these locations, opportunities for future growth could potentially be constrained. Pre and post opening monitoring will be an important element of understanding the impact of the new road on the local highway network.

In addition, the Council will gain possession of a new link road to the west of Wyboston, a new bridge at Roxton Road, and new access points onto the Black Cat junction to replace direct accesses onto the A1, all of which will be added to the Council's asset list.

Impact of detrunking

Detrunking will transfer of the Great Ouse viaduct at St Neots which will increase the length of highway in the Borough and add to the asset list. This is a significant structure which is currently maintained and managed by National Highways but will pass to BBC. The Council notes that traffic flows on the detrunked sections of highway are expected to be at similar levels in 2040 to those currently observed. This means that the sections of detrunked highway will be among the busiest and most heavily trafficked in the Borough which brings additional liability to the Council.

Impact on non motorised users (NMUs)

The Council expects the impact of the scheme on NMUs (walkers, cyclists, equestrians, bus / coach users) to be mixed. Positive impacts include rationalisation of the Public Rights of Way (PROW) network in the vicinity of the scheme and improved safety for pedestrians in Wyboston by the provision of new link roads. However, it is likely that traffic speeds will increase on the A1 through Wyboston which could deter pedestrians from moving within the settlement.

At the new Roxton Road overbridge, the impact on equestrians is less defined.

It is not yet clear what facilities will be provided for cyclists who wish to use the circulatory section of the Black Cat junction. Similarly, the downgrading of the A428 across the River Great Ouse at St Neots may encourage cyclists to use this route, and it is not yet clear if any additional facilities will be installed which would make the route less challenging for cyclists.

While immediate mitigation has been included in the scheme, the Council looks forward to further conversations about the use of designated funds to enhance the offer to NMUs.

For bus / coach users, the current facilities for pick up / set down on the A1 are acknowledged to be below standard. Relocating these facilities in locations which encourage use will help to make them safer.

B. Minerals and Waste

Relevant Local Planning Policy

Bedford Borough, Central Bedfordshire and Luton Council Minerals and Waste Local Plan: Strategic Sites and Policies (Adopted January 2014)

Policy MSP 9

Borrow Pits will be permitted where they meet the following criteria:

- The site is required to supply minerals to specific major construction works;
- The site is well related geographically to the project it is intended to supply;
- The borrow pit will serve the related project only, and will not provide material for the wider market or be retained beyond the life of the project it serves;
- The borrow pit will bring about the removal of mineral and/or waste traffic movements from the public highway and/or from passing local communities;
- The borrow pit will be restored within a similar timescale as the project to which it relates, and restoration can be achieved to an approved scheme in the event that it is only partly worked;
- Waste materials will only be imported from the project itself unless required to achieve beneficial restoration as set out in an approved scheme;
- There is an overall environmental benefit as a result of the proposal and appropriate mitigation measures will be put in place to minimise any adverse environmental impacts'.

Paragraph 6.32 also states that there are benefits and disbenefits associated with the sourcing of aggregate from a borrow pit particularly as operators are often not normally associated with minerals matters and may require greater guidance from local authorities to ensure that the site is operated to an acceptable standard.

There is an overall scheme requirement of 1.435Mt of aggregate of which 800,000 tonnes will need to be imported to the site. This is despite sourcing approximately 500,000m³ of material from borrow pits which would save a total of approximately 125,000 HGV movements on the local highway network. There would also be a saving by using the resultant void space for inert waste arisings from the project which would save further HGV movements.

The principal of providing borrow pits to support the supply of materials for this project is accepted. However, there is a lack of information on how the borrow pits will be worked because the Environmental Statement does not disaggregate and report the environmental conditions and effects of the borrow pits separately as a discreet element of the overall development. Therefore, it is difficult to highlight local impacts apart from in general terms.

There are significant volumes of concrete and asphalt required at different stages of the project and it is unclear how much is planned to be manufactured on site or delivered direct from local infrastructure. On site manufacturing will require sufficient areas for stockpiling materials and these can have environmental impacts if not properly managed at the proposed compounds. It is not clear whether there is sufficient capacity in the local area to deliver the volumes required at specific times. These can have local impacts, if required outside of normal working hours especially as the proposed requirements allow such a long list of exemptions to normal working hours.

The restoration for both borrow pits in Bedford Borough is to agriculture at original ground levels unless otherwise agreed with the relevant landowner. This does raise a degree of uncertainty which makes assessing the local impact challenging. The existing Agricultural Land Classification (ALC) classification for the soils at these sites are Grade 1. Whilst mineral sites can successfully be restored to agriculture, these are normally to lower grade soils. It will be extremely challenging to restore soils to a Grade 1 classification and the proposals are not clear whether this is the goal or it is proposed to restore to a lower grade. Again, this makes it difficult to assess the impact. The precise methodology for stripping, storing and replacing of soils will be critical to the classification achieved as will the management of these in the aftercare period.

C. Ecology

Although the A428 Black Cat to Caxton Gibbet Road Improvement Scheme is only in Bedfordshire for quite a short distance, it is an area with several features of importance for biodiversity. The Development Consent Order (DCO) boundary in Bedford Borough crosses the River Great Ouse, which

is a Local Wildlife Site, but does not include any other statutory or non-statutory wildlife sites. Veteran trees are avoided by the Scheme.

The applicant has completed a suitable range of up-to-date ecological surveys which are based on evidence from the Bedfordshire & Luton Biodiversity Recording and Monitoring Centre and pre-application discussions. There are Phase 1 maps for the whole of the DCO area with suitable habitats surveyed in more detail for a range of notable species or wildlife assemblages. These surveys include invertebrates, reptiles, Great-crested Newts, breeding and wintering birds along with specific surveys for Barn Owl, Red Kite and Hobby, bats and Badgers. In a few places safe access to survey was not possible or permission was not granted, however, these are fairly rare across the scheme.

Description

The A428 Black Cat to Caxton Gibbet Road Improvement Scheme cross areas of countryside with wildlife value and several significant wildlife commuting and/or foraging corridors including the River Great Ouse and numerous hedgerow, some of which link Priority Habitats on either side of the DCO limits. The main ecological features within the Borough are:

- Black Cat Quarry: The restoration scheme for the Quarry will dramatically change this area from the existing working quarry. This makes assessing the future impact of the road scheme more difficult. The Biodiversity Net Gain calculations for the road scheme have not included the changes to occur as part of the Quarry restoration which is a reasonable approach. At present, a number of protected species were found within the quarry area, this includes, breeding birds (Little Ringed Plover, Sand Martin and possibly Hobby), some invertebrate interest, Common Lizards and a badger sett in a spoil heap. Suitable measures for protecting these during construction will be needed, however, as the road is on a viaduct across approximately half of this area connectivity across the road should remain once it was operational.
- River Great Ouse: The river is an important habitat in itself as well as a main commuting and foraging route which is crossed by the scheme. It is one of the main points where bats cross the route and the bankside habitats were also used by badgers. Otters are also known to use the area, although no evidence of a holt was recorded. The road crosses the river on a viaduct which is a continuation of the structure used to cross the Black Cat Quarry area. There are no piers in the river and during normal river flow some bank would be available on both sides of the river under the viaduct. This would allow species like badgers and otters to pass easily. There would be a break in the bankside vegetation as a result of the deep shade cast by the road. Overall, it is unlikely to provide a significant barrier to movement along the river corridor.
- East Coast Mainline Railway: This is in Central Bedfordshire but is not far from the Bedford Borough boundary. The habitats along the sides of the railway line are of significance for some species, particularly reptiles, and it also provides a corridor for wildlife movement. Measures to protect wildlife during construction will be required.
- Woodlands around and including St John's Wood County Wildlife Site (CWS): This area crosses the border between Bedford Borough and Central Bedfordshire and contains most of the potential ecological issues. This eastern agricultural area of Bedfordshire has previously been recognised for its farmland bird assemblages and for raptors. The surveys for this scheme confirmed this and highlighted the presence of Barn Owls (two of the three occupied nest sites were in Bedfordshire, along with five of the seven active roost sites, including one very close to the road), Red Kite, Hobby and other farmland birds. The hedgerows to the north of St John's Wood were also highlighted as key commuting and foraging routes for both badgers and bats, including Barbastelle bats. The road scheme would sever these corridors.
- Arable farmland: Once the proposed road scheme crosses the River Ouse and heads east it crosses an area of the Borough dominated by arable farming. The surveys highlighted the presence of breeding farmland birds, including many Skylarks, along with a good network of hedgerows, some of which were valuable for dead wood invertebrates. Areas of farmland would be permanently lost along with many of the hedgerows. Although some hedgerow planting is proposed there will be a net loss in this habitat type along with the loss of hedgerow connectivity along much of the route.

Mitigation

The surveys identified that the A428 Black Cat to Caxton Gibbet Road Improvement Scheme would have impacts on several notable species or wildlife assemblages within Bedford Borough. The following mitigation measures have been identified for these:

- Barn Owl, Red Kite and Hobby: The road scheme includes woodland planting along the embankments in sections where barn owl foraging, roosting and nesting were observed within the DCO limits or close to it. The planting is designed to try and reduce road casualties, particularly for barn owls. It is important to note that this would only become effective once the landscaping has matured and so early planting is encouraged where possible. Additional measures while the planting matures may be needed in key areas. The installation of new barn owl nest boxes is also included. Ongoing monitoring of Red Kite and Hobby nesting activity will be needed to avoid disturbance to these species. The creation of additional nest for both is included.
- Breeding birds: There will be a loss of breeding habitats during construction and, for farmland birds, during the operational phases of the Scheme. Additional woodland, hedgerow and grassland planting included within the landscaping proposals would provide habitats for some species but not all.
- Bats: The scheme does include fencing, hedge planting and a bat tunnel along the line of the most significant hedgerow which links St John's Wood CWS to others in the area. There is some evidence that such features work, however, much more research is needed into the effectiveness of bat mitigation in road schemes generally. Monitoring the success of the bat tunnel will be vital for this scheme and for future bat mitigation elsewhere. Some information about monitoring is included in the first iteration of the Biodiversity Management Plan with more details expected in the second iteration. It is worth highlighting that the proposed bat tunnel would potentially provide only one connection across the road, whereas currently a number of hedgerows connect the woodlands in this area. Replacement bat roosts are included.
- Badgers: The bat tunnel would also provide a safe crossing point for mammals including badgers. Hedgerows in the St John's Wood area are also important commuting routes for this species as well. The entrances to the tunnel are fenced with a mammal entry point in the corner. I would recommend that this hole is slightly taller than the dimensions included on the current structure diagram. A Natural England licence will be required for some works and suitable measures to protect badgers during construction will be needed across the Scheme in Bedford Borough.
- Great-crested Newts: The Scheme currently plans to use the District Level Licensing Scheme which is operational in Bedfordshire to provide suitable mitigation for this species. No Great-crested Newt ponds within the Borough would be lost and additional waterbodies are proposed.
- Reptiles: Common Lizards were found in and around the Black Cat Quarry, suitable measures during construction will be needed to protect this species.
- Habitats: Table 8-9 of the Environmental Statement shows the distribution of habitats before and after the proposed scheme, including the mitigation proposals. It is for the whole scheme and not broken down into local authority areas. This makes analysis of the impacts on each habitat within a local authority's area difficult. It seems likely that Bedford Borough would see a net gain in woodland and grassland and a net loss in hedgerows and cultivated land, which reflects the pattern over the scheme as a whole. There are few wildflower rich grasslands in this area and so the creation of this habitat would be welcomed.
- Non-native Invasive Species: Several non-native invasive species were found to be within the DCO limits. Suitable measures to prevent the spread of these, particularly during construction will be needed.

D. Archaeology

Chapter 6 of the Environmental Statement (DCO document TR010044-000240-TR010044_A428_Black_Cat_to_Caxton_Gibbet_Improvements_6-1_Environmental_Statement_Chapter_6) has been produced by Highways England and refers to the Cultural Heritage assessments that have been undertaken in advance of the submission of the DCO.

The Bedford Borough Historic Environment Team (Archaeology) were consulted by Highways England regarding the preparation of the archaeological sections of the ES. The Council is satisfied

that the archaeological evaluation work undertaken provides sufficient baseline information to assess the likely impacts of the proposal on underlying archaeological remains.

Whilst the assessment on setting impacts on a number of scheduled monuments still lacks a holistic approach taking into account not just visual impacts but also for example those potentially caused by increased noise or vibrations (as well as any short term impacts from borrow pits) the Council is satisfied that in no example will the harm be above a 'less than substantial' level.

Within Bedford Borough the archaeological evaluation identified a number of sites containing buried archaeological remains of varying significance. These predominantly comprise settlement sites of Iron Age and Romano-British date of varying size and complexity with accompanying field systems. Inhumation burials are expected from at least one of these sites. A further site comprised two as yet undated kilns in close proximity to an early medieval ditch and an area of post-medieval quarrying. In addition to the information from the evaluation recent excavations at the Black Cat Quarry site have demonstrated the potential for isolated early prehistoric remains on the river terrace gravels that are difficult to identify through evaluation due to their dispersed nature. As such there can be considered some potential for as yet unknown remains of this date to survive in these areas.

Regarding Brook Cottages, whilst it is noted that discussions on the future of this building are ongoing, the council is in agreement with the recommendation by Highways England that a Level 3 Building Recording (Understanding Historic Buildings, Historic England 2016) should be undertaken ahead of any work to the structure.

In summary the Council considers that there will be significant impacts to buried archaeological remains within the A428 Black Cat to Caxton Gibbet site. This includes sites identified as part of the pre-DCO evaluation and to any previously unrecorded remains which may be identified during the construction process. The Council is in the process of agreeing a finalised Archaeological Mitigation Strategy (informed by the Councils Archaeological Design Brief) with Highways England in order to inform a programme of investigation of these sites in accordance with Site Specific Written Schemes of Investigation for each site.

E. Conservation and Heritage

From a conservation perspective, the most significant impact flowing from the development is the proposed demolition of Brook Cottages, a grade II listed building (list entry no.: 1,311,862). Its total loss would result in 'substantial harm' to its significance. However, as the building has not been subject to a detailed building survey or associated method statement, assertions made in the application that dismantling and rebuilding Brook Cottages would also result in substantial harm are presently unfounded. The Conservation Officer has advised that until such a survey is provided, the specific level of harm to the designated heritage asset cannot be ascertained, and there is no clear and convincing justification set out within the application that total loss or 'substantial harm' is necessary to deliver the public benefits (which, in NPPF/NPSNN terms, should be acceptable in 'exceptional' circumstances). This information is required before a decision-maker can take into account the impact of the proposal, and the decision-maker should be confident relevant alternatives avoiding substantial harm have been considered by the applicant. The Council have advised that the first step should have been, and should be, to subject the building to a detailed building survey before considering relevant alternatives.

On a related note, there are also concerns regarding the lack of information about Brook Cottages' potential relocation to the Museum of East Anglian Life - this appears to be the only alternative to total loss. The Conservation Officer believes that should relocation be feasible, other locations would need to be explored, including its relocation within close proximity to its present position and retaining its residential use; which may, subject to details, be more appropriate in terms of preserving more elements of its significance. Furthermore, Requirement 16 proposes resolving these issues post-determination, but there is concern that the fate of the listed building is a matter which should be resolved as part of the application.

Regarding the impact on the setting of listed buildings and conservation areas, the Council are in agreement that the scheme would result in a minor level of less than substantial harm to the character

and appearance of Roxton Conservation Area. Following a further document sent on 11/08/2021 from the applicant via email entitled 'Further clarification of effects on designated assets', the Conservation Officer agrees that there is unlikely to be an impact on the significance of the Parish Church of Saint Mary Magdalen.

F. Noise and dust

The proposed development includes the siting and use of borrow pits in the surrounding area as material extraction points for the construction. These borrow pits are in proximity to existing residents and have the potential for causing a significant impact through the emission of dust and noise. Sufficient information on the level of impact and therefore the required level of mitigation is still outstanding and, as such the positioning of the pits themselves are still not assured. Further information is required and discussions are ongoing at this stage. Considering this, at this time the Council have not been able to fully assess the local impact of the proposed development on nearby neighbours specifically in relation to these pits.

Assessments of the noise emission from the use of the development once it is in place have been made and I am in agreement with the methodology used for noise modelling of traffic use of the roads proposed.