



Bedford Borough Council

Development Management

Borough Hall, Cauldwell
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An application by Millbrook Power Limited for Development Consent Order under s37 of the Planning Act 2008 for a gas fired power generation plant of up to 299MW and associated development of gas and electrical connections at Rookery South Pit, near Stewartby, Bedfordshire

LOCAL IMPACT REPORT



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1.0 INTRODUCTION

- 1.1.1 This report has been prepared on behalf of Bedford Borough Council (BBC) in accordance with the advice and requirements set out in the Planning Act 2008 and the Advice Note One: Local Impact Reports issued by the Planning Inspectorate in April 2012.
- 1.1.2 The Local Impact Report is a 'Report in writing giving details of the likely impact of the proposed development on the authority's area '.
- 1.1.3 The Advice Note states that when the Commission decides to accept an application it will ask the relevant local authorities to prepare a Local Impact Report and this should be prioritised whether or not the local authority considers that the development would have a positive or negative effect on the area. The Report may include any topics that they consider to be relevant to the impact of the development on their area as a means by which their existing body of knowledge and evidence on local issues can be fully and robustly reported to the Commission. The Report should contain positive, negative and neutral impacts.
- 1.1.4 The Advice Note states that topics may include:
- Site description and surroundings/location
 - Details of the proposal
 - Relevant planning history and any issues arising
 - Relevant development plan policies, supplementary planning guidance or documents, development briefs or approved master plans and an appraisal of their relationship and relevance to the proposals
 - Relevant development proposals under consideration or granted permission but not commenced or completed
 - Local area characteristics such as urban and landscape qualities and nature conservation sites
 - Local transport patterns and issues
 - Site and area constraints
 - Designated sites
 - Socio-economic and community matters
 - Consideration of the impact of the proposed provisions and requirements within the draft Order in respect of all of the above



- Development consent obligations and their impact on the local authority's area
- 1.1.5 The Local Impact Report may also comment on the development consent obligations and the requirements and also any relevant representations.
- 1.1.6 In producing the Local Impact Report the Council has sought the views of local parish councils within BBC namely Stewartby and Elstow and Wootton and internal consultees as to any particular matters that should be reflected in the report.
- 1.1.7 The Local Impact Report is intended to be used by the local authority as a means by which the existing body of local knowledge and evidence on local issues is fully and robustly reported to the Commission.
- 1.1.8 The Local Impact Report has been written so as to incorporate the topic areas suggested in the Advice Note (set out above), the subject areas in the Environmental Statement, other relevant subject areas and the obligations and proposed requirements submitted with the application for DCO.



2.0 SITE DESCRIPTION & SURROUNDINGS/LOCATION

- 2.1.1 Rookery Pit is centrally located within the Marston Vale mid-way between Bedford town to the north and the M1 to the south.
- 2.1.2 The site on which the gas fired power station would be constructed is located within Rookery South Pit and lies wholly within Central Bedfordshire Council's (CBC) municipal boundary. The access road up to the level crossing lies within CBC. The junction of Green Lane with the C94 is wholly within BBC whilst the stretch of Green Lane between the level crossing and this junction is partly in both local authority areas.
- 2.1.3 Rookery North Pit, which lies outside the DCO area, is split between both authority areas with the western section being in CBC and the eastern section being in BBC.
- 2.1.4 Of particular significance for BBC is the close proximity of the model village of Stewartby which is located directly to the north of Rookery North pit. The derelict brickworks site and Stewartby landfill lie to the west of this. Further to north are the villages of Wootton and Kempston Hardwick.
- 2.1.5 To the east and west of the Rookery Pits are railway lines. There is Marston Vale Line to the west and the Midland Main Line to the east. To the west, beyond the Marston Vale railway line, lie the Forest Centre and Country Park and Stewartby Lake where the Stewartby Watersports Club operates. The Forest Centre, Country Park and Stewartby Lake lie within CBC.
- 2.1.6 The village of Marston Moretaine lies to the west of the Forest Centre, and is bounded by the C94 to its west. This village lies within CBC.
- 2.1.7 The Vehicle Proving Ground and Lidlington and Millbrook lie to the south of Rookery South Pit and are also within CBC. Houghton Conquest to the east is also within CBC.
- 2.1.8 The nearest property to the site is South Pilling Farm which is situated between the western section of Rookery South Pit and the Marston Railway line.
- 2.1.9 To the north of Green Lane, opposite Stewartby Lake and Rookery North Pit and the proposed access from the Resource Recovery Facility (RRF), lies the redundant brickworks site. This area may be redeveloped in the future probably for residential and commercial development. This area lies within BBC.



- 2.1.10 Further afield the Wixams new settlement lies north-east of the proposed RRF, and the village of Wootton lies to the north-west of the proposal. Wootton lies in BBC, whilst the Wixams is split between the two authorities.
- 2.1.11 It can be seen from the above description that the majority of the DCO area with the exception of the parts of Green Lane lies within CBC. The wider area surrounding the site is partly within CBC and partly BBC. Because of this there are some matters that are very specific to a particular authority.
- 2.1.12 The Council understands that work has now commenced on the construction of the Covanta RRF that comprises an energy from waste electricity generating station with a gross electrical output capacity of 65 MWe, together with associated development including a post treatment materials recovery granted under Development Consent Order IPC EN010011. That land is located immediately north of the current application site and shares the access with this proposal.

3.0 HISTORICAL BACKGROUND

3.1 Brick Making in Marston Vale

- 3.1.1 In 1881 a major brick making centre began in Fletton in Peterborough, where it was discovered that below the top callov of Oxford Clay, a shale like grey-green deposit known as knots was ideal for the manufacture of what have since become known as Fletton bricks. The London Brick Company was established there in 1889.
- 3.1.2 One of the largest exposures of Oxford Clay in the country was identified within the Marston Vale, and this resulted in the opening, in 1897, of the first local Fletton brickworks by B.J. Forder & Sons at Wootton Pillinge (which later became known as Stewartby). London Brick Company acquired an estate of about 450 acres at Elstow in 1905.
- 3.1.3 In 1923 the two companies merged to be known as London Brick Company and Forders Limited. By 1936 the works at Stewartby has become the largest brickworks in the world, employing 2000 people to produce 500 million bricks a year.





An aerial view of the brickworks in 1939

- 3.1.4 Between the wars other large brickworks were opened in the Vale: Eastwoods Flettons Limited at Kempston Hardwick; the Marston Valley Brick Company Ltd at Lidlington and Ridgmont; and the Bedford Brick Company built the Coronation works.
- 3.1.5 With the advent of planning controls in 1947, the three brick companies then operating were obliged to seek planning permission for the continuation of their operations. Four planning permissions were granted by the Minister between 1947 and 1952 which covered most of the working areas. Eleven further planning permissions for minor extensions to various sites were granted by the Local Authorities between 1953 and 1971.
- 3.1.6 By 1971 vast pits had been excavated and the London Brick Company owned all the local brickworks, although 1973 was the last year when all the main works were still operating. The works at Elstow, Coronation and Lidlington were closed between 1973 and 1974.
- 3.1.7 In 1979/80 London Brick submitted two applications for new brickworks; one in Coronation Pit to replace the Stewartby Works and the other to replace the Ridgmont works on the same site. The Company agreed to include within the applications all of the areas of permitted clay reserves to feed the brickworks in order to allow the County Planning Authority to revise and update all of the conditions. Two permissions were granted for new brickworks in 1980/81, one for the north and one for the south of the Vale, each relating to a new brickworks and associated areas for clay extraction (see Plan 2, which shows the sites that fell under the 1980/81 clay permissions).
- 3.1.8 By the time these two permissions had been granted, the Fletton brick industry had been hit by recession, the Ridgmont works had been closed and, for this and other reasons, neither of the two new brickworks were built. A subsequent application was submitted for a new works in Rookery Pit, to be operated in conjunction with the Stewartby works, but the applicants were not prepared to meet the cost of necessary highway improvements and permission was never granted.
- 3.1.9 However, the clay pits continued to operate in accordance with the permissions granted in 1980/1981, which included requirements for submission of detailed schemes of working and restoration schemes for each site. In the case of restoration, these schemes were to provide for the final restoration of all the sites by means of backfilling, flooding or restoration at a reduced level.
- 3.1.10 Throughout the 1980s the drive towards modernisation continued, and some of the older chimneys at Kempston Hardwick and Stewartby were demolished. Despite cutbacks, London Brick was still a large local employer.
- 3.1.11 This success, and the company's venture into the increased manufacture of facing bricks in addition to the common and Fletton brick, prompted a take-over bid by the Hanson Trust, who were already involved in the manufacture of facing bricks. London Brick was confident of resisting the take-over, and publicised plans for the new £25 million 'superworks' at Stewartby. However,



in March 1984, the Hanson Trust, with a bid of £247 million, successfully captured over 50% of London Brick shares. This gave it overall control of the company, and plans for the 'superworks' were shelved. In 1985 cutbacks were made, 1285 workers were made redundant, 407 of those from Stewartby. Over the next three years the same number of people were taken back on to cope with an upturn in demand. This boom was followed with another slump in the early 1990s, with 556 redundancies in 1990 and a further 340 in 1992.

- 3.1.12 On 3 February 1999 Hanson Brick announced the closure of the works at Kempston Hardwick. In February 2008 brick production at Stewartby ceased altogether, bringing the history of large scale brickmaking in Bedfordshire to an end.



The former London Brick Company Limited Headquarters at Stewartby



3.2 The legacy of the brickmaking industry

- 3.2.1 As highlighted above the Marston Vale has a long history of clay extraction associated with the brickworks. Numerous pits were created in and around Stewartby and Marston Moretaine as a result of this extraction - Quest Pit, Coronation Pit, Stewartby Lake and Rookery Pits to name but a few. The legacy that this industry has left behind is discussed below.

Landfill

- 3.2.2 The extraction of clay in the Marston Vale led to the presence of substantial clay voids. Following the end of clay extraction, many of these voids have become landfill sites, and have received tens of millions of tonnes of household, industrial and business wastes. As well as locally arising wastes, large volumes of waste were brought in from London and the south east. The pits at Stewartby and Brogborough have been landfilled in this way.
- 3.2.3 Residents have been adversely affected by increased HGV traffic, particularly traffic in the early hours of the morning and late into the evening as many pits were not subject to operational hours restrictions. Litter and odour have also had an impact. Such impacts on their daily lives are still fresh in the minds of many local residents.

Emissions and Pollution

- 3.2.4 The operation of the brickworks resulted in the release of noxious gases caused by the high sulphur content of the clay. The most significant compounds released were the sulphur and fluoride compounds and the 'mercaptans' which cause an offensive rubbery odour.
- 3.2.5 Environmental legislation forced the old fashioned brickworks at Stewartby to be upgraded during the 1990's. Further upgrades were undertaken in 2005/6 in an attempt to reduce sulphur dioxide emissions by which time only 230 people were employed and only two kilns and three chimneys were in use. The company failed to reduce the emissions to the levels required by legislation and the brickworks closed in 2008.
- 3.2.6 The release of the gases created both air quality problems and odour issues. Local residents are fully aware of the impacts of the smoke and gases created by the brickmaking process and it is the experience of this - the odour and impact on health and general amenity that is providing the basis for many of the health and amenity concerns raised in respect to the Covanta proposal.

Stewartby Model Village

- 3.2.7 Halley Stewart expanded Forder's works at Wootton Pilling after becoming chairman in 1900. Successive generations of the Stewart family ran the London Brick Company and were central in developing Wootton Pilling as a new model village for the works employees. This was later renamed Stewartby in honour of Sir Halley Stewart, who died in 1936.



- 3.2.8 The Stewart family were renowned for their concern for their workers welfare. The model community therefore came complete with a school, sports club, church, a town hall, working mens club and numerous other amenities. There were also various welfare, pension, and profit-sharing schemes.
- 3.2.9 Because there was a strong linkage between the local residents and the brickworks and the mineral extraction there was local 'buy in' to the clay extraction and brickmaking and residents put up with the adverse effects of these activities. Indeed in the 1930's there would have been less awareness of the potential health impacts of the emissions by the brickmaking companies and the local residents and the discomforts of living in a malodourous environment where the smoke from the numerous chimneys could be clearly seen would be offset by having employment with a respected company and the provision of a good standard of housing and associated benefits. This provision continued into retirement.

3.3 The Future

- 3.3.1 Clay extraction has now ceased and the brickworks have closed. Landfill activities are also drawing to a close. Brogborough landfill site has stopped taking in waste and is now closed. Stewartby landfill site is being progressively restored to agricultural land. There are considerable amounts of un-restored land from the former brick manufacturing activity. However, the area as a whole is being regenerated. Local residents are looking towards a future which is not overshadowed by the importation of further waste from areas distant from Bedfordshire, as has historically been the case in order to restore the huge pits left following clay extraction. Former landfills sites are being grassed over or being restored for beneficial purposes.

Lakes

- 3.3.2 The Vale now contains seven areas totalling over 318ha of former claypits which have been flooded to provide water leisure and nature conservation related uses. The largest of these is the lake formed at Stewartby which is now used for a variety of water sports including sailing, windsurfing and power boating by the Stewartby Watersports Club.

Marston Vale Community Forest

- 3.3.3 The Forest of Marston Vale is an initiative to develop a combination of woodlands, wetlands, and public open spaces, in order to regenerate the landscape of the Marston Vale area as a whole. The Forest of Marston Vale is one of several Community Forests in England developed since 1990, with the aim of regenerating the landscape of this area, promoting biodiversity, and improving public access (see plan 3 which shows the extent of the Forest of Marston Vale).



- 3.3.4 Former brickpits have been restored for nature conservation purposes, agriculture or leisure activities. There has also been built development such as the creation of a business park at the former Coronation Pit. The restoration of sites and the creation of new development has had a positive effect on local residents perceptions of the area



4.0 RELEVANT DEVELOPMENT PLAN POLICIES, SUPPLEMENTARY PLANNING GUIDANCE OR DOCUMENTS, DEVELOPMENT BRIEFS OR APPROVED MASTER PLANS AND AN APPRAISAL OF THEIR RELATIONSHIPS AND RELEVANCE TO THE PROPOSALS

4.1.1 The main development plan policies, supplementary planning guidance and development briefs relevant to this part of BBC are set out below. It should be noted that there are a number of sites that have been identified within the area for housing and commercial development. At some of these sites, such as The Wixams, development has already started.

4.1.2 Bedford Borough Core Strategy and Rural Issues Plan (adopted 2008)

- Policy CP3 defines locations for growth in the borough as being within the urban area and within the defined Growth Area key service centres. Outside of these areas countryside policies will apply.
- Policy CP4 defines Growth Area key service centres as being Stewartby, Wootton and The Wixams.
- Policy CP6 provides for 16,270 additional dwellings in the Growth Area between 2001 and 2021.
- Policy CP11 provides for 75 hectares of additional employment land in the borough between 2001 and 2021. The preferred location for strategic employment sites will be the Growth Area.
- Policy CP13 defines areas of countryside in the borough and restricts development to that consistent with national policy, particularly PPS7 (which has now been replaced by the National Planning Policy Framework (NPPF)).
- Policy CP22 protects green infrastructure from development and supports the creation of the Bedford to Milton Keynes canal.
- Policy CP23 protects and enhances the character of conservation areas, listed buildings, other historic or archaeological features and cultural assets.
- Policy CP24 conserves and enhances the landscape and character of the borough, with a particular focus on the Marston Vale as a focus for landscape enhancement and restoration.
- Policy CP25 protects and enhances the biodiversity and geodiversity of the borough.
- Policy CP26 requires development to minimise the emission of pollutants into the environment.



- Policy CP28 supports the Local Transport Plan, which seeks to make travel safer and improve air quality.
- Policy CP30 requires development to provide additional or improved infrastructure, amenities or facilities where needed.

4.1.3 Bedford Borough Allocations and Designations Plan (2013)

- Policy AD5 allocates land on the north side of The Wixams to be developed for a mix of residential, employment, school and community uses.
- Policy AD3 allocates land at Hall End Road, Wootton for a mix of residential and educational uses.
- Policy AD13 allocates 10 ha of land south of Wootton for the Marston Vale Innovation Park employment site.
- Policy AD24 designates land in the Marston Vale as a green infrastructure zone where development is expected to contribute to protection, enhancement and creation of green infrastructure.
- Policy AD25 designates the area of the Forest of Marston Vale and expects development to contribute to implementing the aims of the project.
- Policy AD27 designates the route of the Bedford to Milton Keynes Waterway Park.

4.1.4 Development briefs and design guides have been adopted as supplementary planning guidance in relation to development proposals at–

- Stewartby – strategic development of housing, employment, local shops and open space
- Wootton – strategic development of housing, employment, school, local shops and open space
- The Wixams (formerly Elstow New Settlement) – strategic development of housing, employment, schools, town centre and local shops, new rail station and open space. The brief anticipates a number of expansion areas which will greatly increase the initial capacity of 4,500 dwellings. (The brief has been adopted jointly with CBC.)

4.1.5 Minerals and Waste saved policies and emerging development plan policy is set out in the Detailed Representations.

4.2 **Relevant development proposals under consideration or granted permission but not commenced or completed**



4.2.1 Recent planning applications for major development in the vicinity of the proposal include:

- **Broadmead Road, Stewartby** (application reference: 97/01163/OUT) – This development was granted outline planning permission in 2009. It will comprise approximately 700 dwellings (including a small area in CBC), employment development, local shops and open space.
- **The Wixams** (application reference: 99/01645/OUT) – This development (including Village 1 which is currently under construction) was granted outline planning permission in 2006. It will eventually comprise approximately 4,500 dwellings, a town centre, schools, employment areas and open space, with potential for further expansion which will increase capacity. (The site is partly within CBC.)
- **Fields Road, Wootton** (application reference: 02/01013/OUT, 02/01322/OUT and 02/01445/OUT) – It was resolved to grant outline planning permission for these three development sites in 2005 and 2006. The development is under construction and will comprise in excess of 1000 dwellings, employment development, a lower school, local shops and open space.
- **The Brickworks Site** (application reference: 08/01773/EIA) - In Development Plan terms the brickworks site is located outside the Stewartby settlement policy area in open countryside. It is not allocated for development and there is no development brief for it. Although it is previously developed land, in policy terms, unless a need can be demonstrated for it by the applicant, it is contrary to policy. There is a current planning application for predominantly housing development with some employment – which is, as yet, undetermined.



4.3 Other Relevant Plans and Strategies

- 4.3.1 **The Forest of Marston Vale Plan** published in 1995 sets out objectives for the Forest of Marston Vale Community Forest, which is one of 12 community forests in England established by the Countryside Agency and Forestry Commission to regenerate the environment, improve the landscape (especially in areas of dereliction), increase opportunities for recreation and create new opportunities for nature conservation. The Forest of Marston Vale was established in 1995 with a vision of “working in partnership towards a long-term vision of a varied countryside within a woodland framework for the benefit of everyone”. The review published in 2000 describes progress and makes detailed proposals. In planning terms the status of the document is only that given through the Core Strategy and Rural Issues Plan – Policy CP24 states (amongst other things) “The Marston Vale will be the focus for landscape enhancement and restoration and the council will continue to support the Forest of Marston Vale”.
- 4.3.2 **The Marston Vale Strategy**, launched in 1993, is a partnership initiative involving the local authorities and major landowners in the Vale. The objective is to create “a more attractive and varied landscape, characterised by extensive woodland and copses, water areas and well-managed farmland within the initial 20 years”. The Strategy recognises the need to minimise the environmental effect of extractive, brickmaking and landfilling operations. “New housing and other sensitive developments will be located to take into account current and future areas of extraction, landfill and prevailing wind direction.” It has no status in planning terms.

4.4 Appraisal of policy relevance to the proposals

- 4.4.1 The Marston Vale has been used historically for clay extraction and brick making. The resultant pits have provided an opportunity for landfilling (as well as recreation). Together, these land uses have damaged the landscape and created a number of environmental problems. By contrast, a number of policies have been or are being put in place by BBC to improve the environment, such as the Forest of Marston Vale and the Bedford to Milton Keynes Waterway Park. The Vale is also identified as a strategic focus for housing and employment development, taking advantage of its improving environment since the closure of the brickworks. In particular, the settlements of Stewartby and Wootton have been identified as strategic locations for expansion in addition to the new settlement at The Wixams.
- 4.4.2 The Marston Vale is only now emerging from a long period of environmental degradation. The numerous brickworks have now all ceased production and their sites have been or are being reclaimed, landfilling of untreated waste is drawing to a close and former landfill sites are being restored. Air quality has dramatically improved and environmental concerns have been addressed.



5.0 SOCIO-ECONOMIC AND COMMUNITY MATTERS

- 5.1.1 The planning policy considerations are set out above. The view of the Council and of the local councillors is that no objection is raised to the development on socio economic and community grounds.
- 5.1.2 It is acknowledged that there would be jobs created during construction and the operation of the facility (between 25-122 at any given time) however it is recognised that due to the specialised nature of the construction of the facility many of the jobs that this stage may go to a 'temporary' workforce from elsewhere rather than local residents. Similarly, whilst some permanent jobs may go to local residents under 15 jobs would be created in total and not all would be taken up by those already living locally.

6.0 LANDSCAPE AND HISTORIC FEATURES

6.1 Landscape

- 6.1.1 The view of the Council and of the local councillors is that no objection is raised to the development on landscape grounds.
- 6.1.2 The characteristics of the area in landscape terms have been described in detail in the Environmental Statement. The area is generally considered to be rural in character with much of the area surrounding the site remaining open and undeveloped. It must however be recognised that the approved, and under construction, Covanta RRF being built immediately adjacent to the Millbrook Site will be a significant feature in the landscape. The stack, in particular, will be visible from Stewartby village and the wider area. The scale and dimensions of that plant are far larger than this proposal and will have a far greater impact on the landscape.

6.2 Historic Features

- 6.2.1 The view of the Council and of the local councillors is that no objection is raised to the development on Heritage grounds.
- 6.2.2 The four remaining chimney stacks at the former brickworks at Stewartby are grade II listed. They are iconic structures in the landscape however Listed Building consent ref 17/01196/LBC for Demolition of the four former brickwork chimneys and associated firing chambers of two brick kilns (excluding the outer walls of both kiln blocks) has a resolution to grant subject to a S106 Agreement which will see the chimneys removed and a replica built elsewhere on the site.



7.0 LOCAL TRANSPORT ISSUES

7.1 Local Transport Patterns

- 7.1.1 The view of the Council and of the local councillors is that no objection is raised to the development on Transport grounds.
- 7.1.2 Green Lane is the main access into Stewartby village from the A421. Whilst there is also access from the A6 Bedford Road to the east this is restricted by a railway arch.
- 7.1.3 The development is forecast to generate 40 HGV movements and 118 car movements a day during normal construction works and a peak of 125 HGVs a day over a 2 day period at the busiest construction phase. Once constructed this level will be up to 5 members of staff working at any one time with three shifts a day and up to 40 staff during maintenance periods.
- 7.1.4 The access will be shared with the Covanta RRF which is forecast to generate a significant number of HGV movements a day (594) delivering waste to the site.
- 7.1.5 The Council is satisfied that the levels of traffic generated by this development can be accommodated on the road network. It is also acknowledged that the levels of HGV and other traffic created by the proposed operations will not have a significant effect on the A421.
- 7.1.6 All HGV traffic relating to the development must be kept out of the villages in particular Stewartby. No rat running should be permitted. A routing plan should be agreed with BBC by way of condition on any DCO granted.

7.2 Site and area constraints

- 7.2.1 Access to the site is potentially constrained by the need to cross the level crossing on Green Lane by Stewartby Halt however the level of vehicle movements which will be generated is predicted to be easily accommodated into the network.
- 7.2.2 If the level crossing is out of operation for any reason then the alternative access is Broadmead Lane which has weight limit restrictions for environmental reasons. The use of this road by HGV's serving the site is unlikely to be popular with local residents. The aforementioned requirement for a routing plan to be agreed with BBC is again important in this regard.



8.0 BIODIVERSITY

8.1.0 The view of the Council and of the local councillors is that no objection is raised to the development on Biodiversity grounds.

8.1.1 Rookery Pits is a County Wildlife site. However, much of the nature conservation value of the southern pit will be destroyed as a result of the implementation of the low level restoration scheme which will require this pit to revert to low level agriculture with some additional tree planting around the periphery. Nevertheless, the low level restoration scheme approved in the Review of the Old Mineral Permission for these pits will retain the northern pit for nature conservation purposes and will ensure that there is long term ecological management.



9.0 AIR QUALITY AND LOCAL TEMPERATURE INVERSIONS

- 9.1.0 The view of the Council and of the local councillors is that no objection is raised to the development on Air Quality grounds based on the conclusions contained in the Air Quality section on the PIER documents which has identified the maximum predicted ground level concentrations from the realistic worst case scenario for a stack height of 32.5m as insignificant.



10.0 **NOISE**

10.1.0 The view of the Council and of the local councillors is that no objection is raised to the development on noise grounds. This is on the basis that the nearest noise receptors to the site fall within CBC and therefore BBC is satisfied that the measures to be put in place to protect the amenities of those nearest neighbours will also be effective for the residents within BBC.

10.1.1 HGVs accessing the site have to cross the level crossing and because of the uneven nature of the tracks will inevitably create a certain amount of clanging and banging. This will however be against the background of the HGV vehicle movements associated with Covanta RRF. Once the facility is constructed this will reduce to car movements which will not cause any significant disturbance.



11.0 LIGHT POLLUTION

- 11.1.0 The view of the Council and of the local councillors is that no objection is raised to the development on light pollution grounds.
- 11.1.1 It is acknowledged that if permitted there would be a lighting strategy in place that would seek to limit the amount of lighting on the site especially outside daylight hours. However, the area of Marston Vale as a whole is very dark at night. It is possible that there will be a glow from the site visible to the residents living at the southern side of Stewartby village however this will be against the much larger Covanta RRF plant and is not considered this will be harmful.

12.0 PLANNING GAIN

- 12.1.0 As the site falls wholly within CBC with only the access junction in BBC no specific planning gain is being sought by BBC. Improvements would be undertaken to footpath/cycleway network and linkages with Country Park as a result of the Covanta RRF project which has been consented and there will be additional tree planting and improvements within CBC.

13.0 CONSIDERATION OF THE IMPACT OF THE PROPOSED PROVISIONS AND REQUIREMENTS WITHIN THE DRAFT ORDER IN RESPECT OF ALL OF THE ABOVE

- 13.1.0 The provisions and requirements within the draft DCO could have a significant effect on the extent of the impact of the development on the local area. It should be possible to mitigate some of the day to day impacts and to make the development more acceptable than it would otherwise be.
- 13.1.1 Set out below are some of the ways in which the provisions of the DCO will impact on the area and on local residents and others that use the area for their leisure activities.
- 13.1.2 The Provisions of the Development Consent Order**
- 13.1.3 The DCO will set out a number of matters to enable the development to proceed.
- 13.1.4 The Order will specify the extent of the compulsory purchase powers to acquire land or interest in the land to enable the development to proceed. The impact on BBC of the acquisition of land or interests in the land appears to be limited.
- 13.1.5 The development of the facility will require the establishment and stopping up of two short lengths of public footpath. These currently provide no useful purpose having been truncated by the previous clay extraction. Both of these short lengths of path are in CBC and their stopping up is unlikely to have any effect on the residents of BBC as it is intended to provide definitive and permissive footpaths through the low level restoration scheme and these would be enhanced as part of the Covanta RRF scheme which will also result in the upgrading of some footpaths to footpath/cycleways. This



may be seen as a benefit to those living locally and residents that want to walk or ride in the countryside around Stewartby.

13.1.6 There is provision for orders for roadworks associated with the development. Potentially these could be beneficial to local residents as they would ensure the making up and ongoing maintenance of Green Lane.

13.1.7 The Order would also specify what permitted development rights will be enjoyed by the company. Whilst it is acknowledged that there needs to be some ability for the company to undertake maintenance and do some minor works without recourse to the Planning Authority it is felt that these powers should not be so extensive as to enable the company to undertake substantial works that would increase the size or height of the facility, vehicle movements to the facility, or the overall impact of the facility on the area without requiring additional permissions. To have very extensive permitted development rights would be unacceptable to the Council.

14.2.0 **The Requirements**

14.2.1 The requirements are considered to be similar to planning conditions.

14.2.2 The visual impact of the facility is considered to be one of the main impacts of the development on the local area. It is envisaged that there would be a requirement relating to the approval of facing materials, landscaping and other detailed matters which would be dealt with by CBC.

14.2.3 It is envisaged that the DCO would cover a number of highway and access related matters, specifically requirements to improve and maintain the standard of Green Lane, however it is recognised that there may be some duplication with the requirements already placed on Covanta within their DCO area.

14.2.4

The Travel Plan

14.2.5 In order to seek to limit the number of employees using cars to travel to and from work, to reduce the impact on Green Lane and to promote public transport (such as the use of rail especially with the local station within walking distance of the facility), it is important that a Travel Plan is drawn up and implemented. As this will be a long term plan it can only be achieved through the DCO.



Strategic Routing Plan

- 14.2.6 The routing plan would be in the DCO and will ensure that HGV's associated with the facility use the strategic highway to prevent rat running through villages. As discussed earlier in the LIR, a routing plan is required to be agreed with BBC and this should form a requirement of the DCO.

Long Term Habitat Management

- 14.2.7 There is a Low Level Restoration Scheme approved for both Rookery North and South Pits through the review of the old minerals permission. This provides for the ongoing ecological management of the pits up to 2024. However, it is important that this habitat management is ongoing and that local habitats are enhanced and species protected for the duration of the development. This can only be achieved through the DCO.
- 14.2.8 The DCO is the mechanism through which any financial contributions will be administered. It is important that the process for allocating funds is clear and that there is a local input into the allocation of funds.



15.0 THE RELATIVE MERITS OF SOCIAL, ECONOMIC AND ENVIRONMENTAL IMPACTS OF THE PROPOSED GAS FIRED POWER STATION.

15.1.0 The Planning Inspectorate guidance on Local Impact Reports (April 2012) recommends that a view is given by the authority of the relative weighting between social, economic and environmental issues associated with the proposal and the impact of the scheme on them. This includes employment, local services and associated development.

15.1.1 It is felt that there will be some limited positive impact on the local area in respect to the creation of jobs both during construction and the operation of the plant but that this would not offset the potential negative impacts the facility may well have on attracting new development to the area, on house prices and the ability to sell property and generally on the ongoing regeneration of the area from its industrial past to a greener cleaner future. This however has to be considered within the context and scale of the Covanta RRF plant which is in the process of being constructed immediately adjacent to the Millbrook Site.

15.1.2 In terms of environmental matters there would be some positive benefits in respect to the upgrading of footpaths to dual use paths for facilitate cycling (which would also have social benefit), an extension to the habitat management in Rookery Pits and additional tree planting.

15.1.3 Overall BBC does not raise any objection to the development.

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12th April 2018

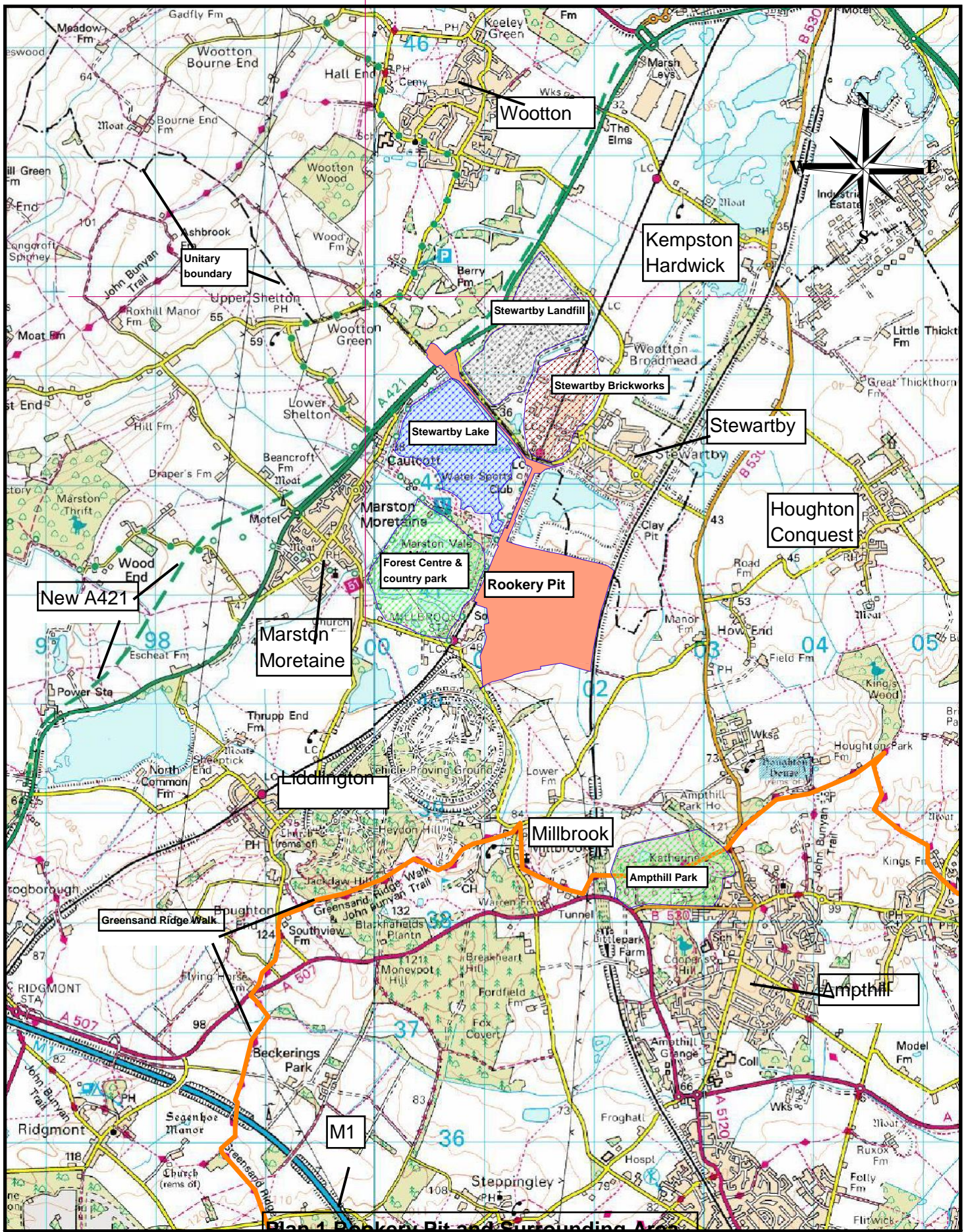


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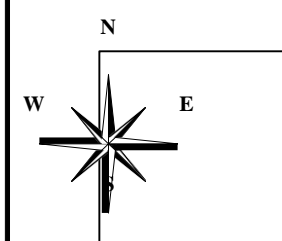
Development Management

Borough Hall, Cauldwell
Street, Bedford, MK42 9AP.

PLANS



Plan 1 Rookery Pit and Surrounding Area

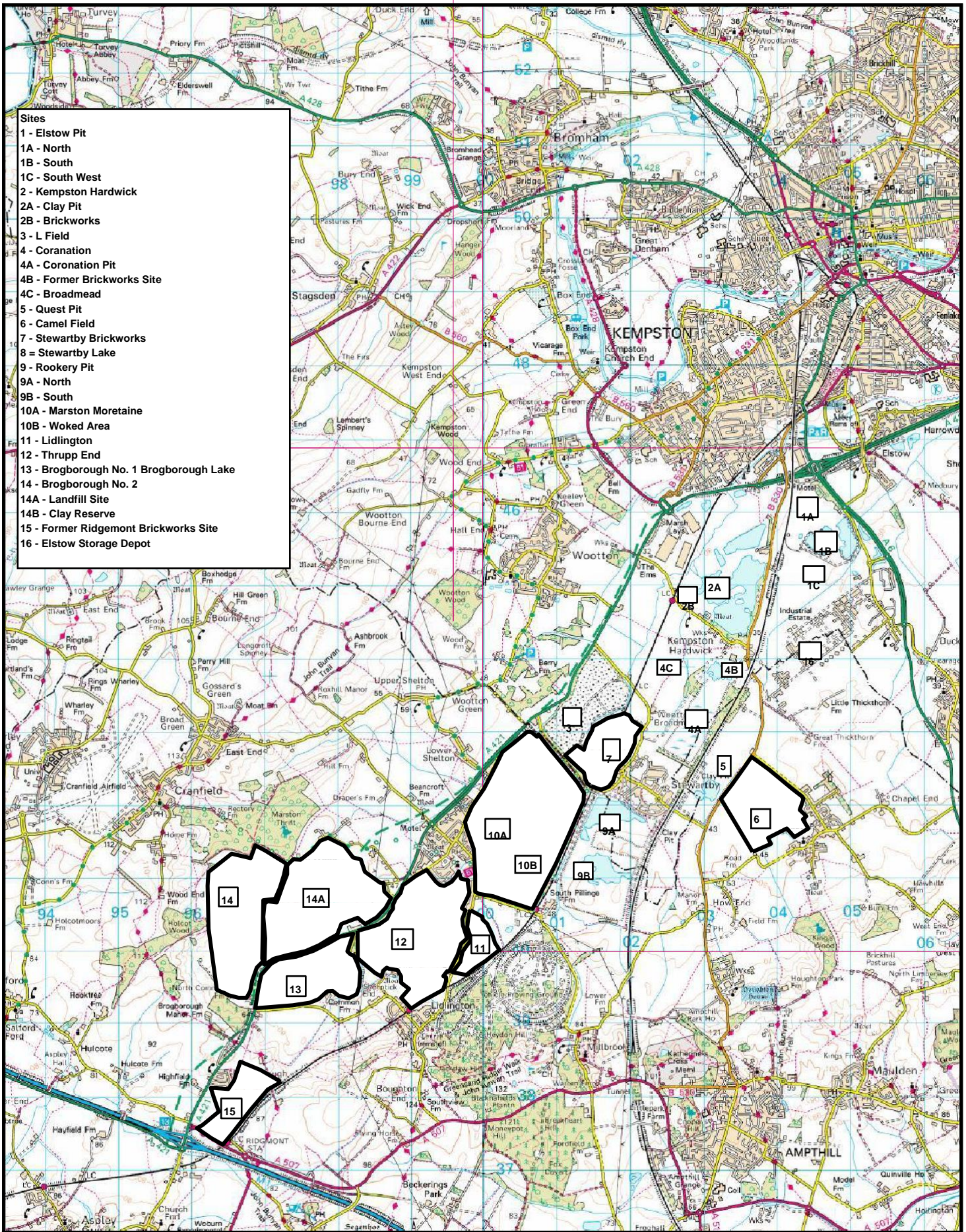


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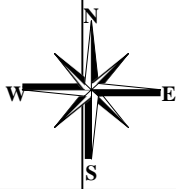
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- Sites**
- 1 - Elstow Pit
 - 1A - North
 - 1B - South
 - 1C - South West
 - 2 - Kempston Hardwick
 - 2A - Clay Pit
 - 2B - Brickworks
 - 3 - L Field
 - 4 - Coranation
 - 4A - Coranation Pit
 - 4B - Former Brickworks Site
 - 4C - Broadmead
 - 5 - Quest Pit
 - 6 - Camel Field
 - 7 - Stewartby Brickworks
 - 8 = Stewartby Lake
 - 9 - Rookery Pit
 - 9A - North
 - 9B - South
 - 10A - Marston Moretaine
 - 10B - Woked Area
 - 11 - Liddington
 - 12 - Thrupp End
 - 13 - Brogborough No. 1 Brogborough Lake
 - 14 - Brogborough No. 2
 - 14A - Landfill Site
 - 14B - Clay Reserve
 - 15 - Former Ridgemont Brickworks Site
 - 16 - Elstow Storage Depot

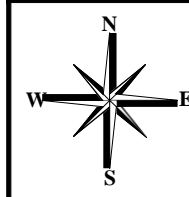
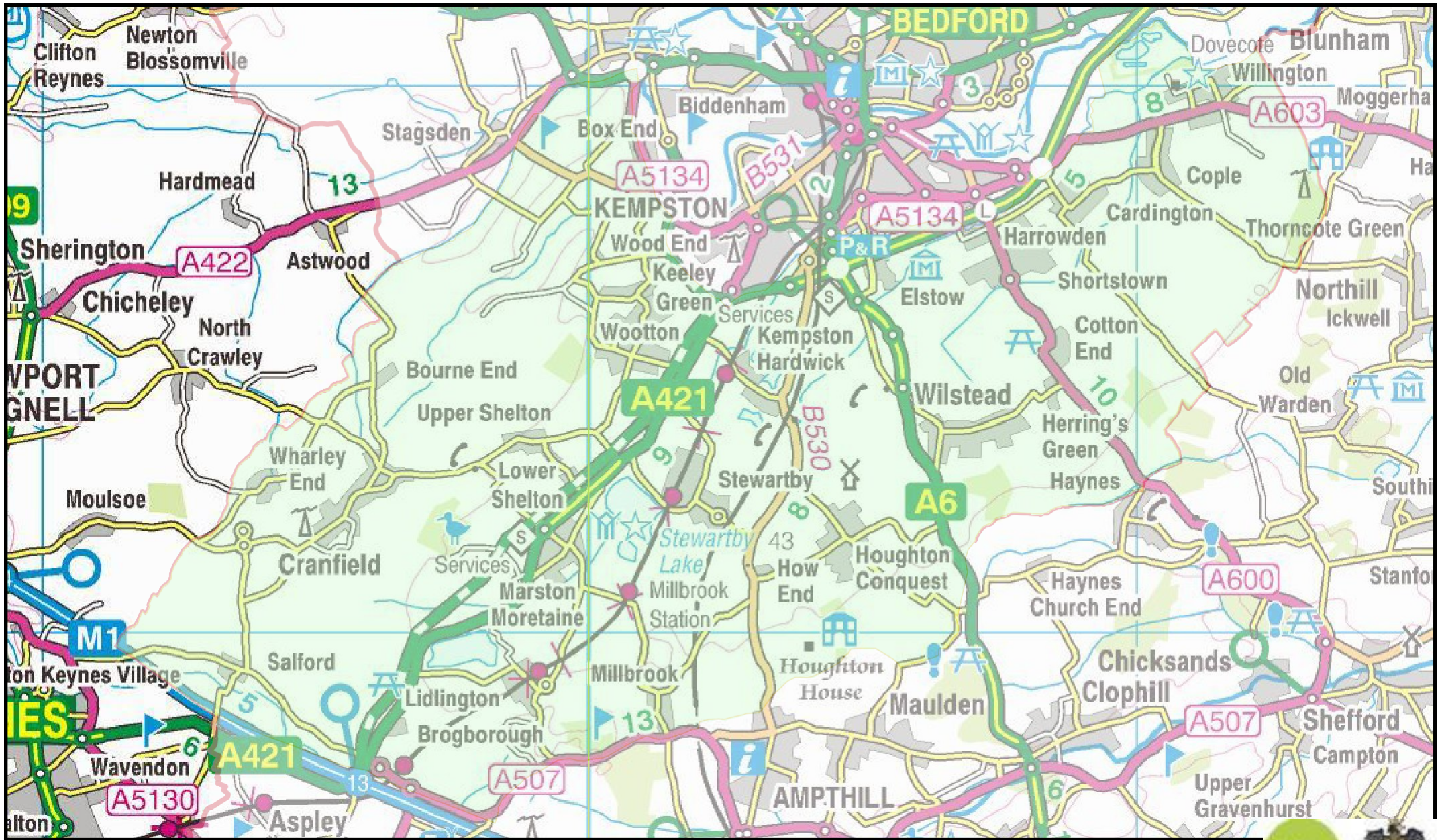
Plan 2 sites that fell under the 1980/81 clay permissions



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Plan 3 The Forest of Marston Vale

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