

Development Management

Central Bedfordshire Council

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An application for Development Consent Order for an up to 299 megawatts (MW) gas fired peaking power generation plant designed to produce electricity, along with associated development, such as a gas connection and electrical connection at Rookery South Pit, near Stewartby, Bedfordshire

LOCAL IMPACT REPORT

IPC Reference

Number EN01006

1.0 Introduction

- 1.1 This report has been prepared on behalf of Central Bedfordshire Council 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 Infrastructure Planning Commission in March 2010.
- 1.2 The Advice note states that a Local Impact Report is a 'Report in writing giving details of the likely impact of the proposed development on the authority's area.
- 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, negative or neutral 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.
- 1.4 The Advice Note indicates that topics addressed in the LIR 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

The Local Impact Report may also comment on the development consent obligations and the requirements and also any relevant representations.

- 1.5 It is acknowledged that the submission by Millbrook Power Limited (MPL) is a very detailed one and that many matters affecting the local area have been mentioned and addressed to a greater or lesser extent. However, there are

some matters that have not been covered and others where the local authority feel that a different emphasis should be put on their relative importance in assessing the impact of the proposal on the area surrounding the site.

- 1.6 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.
- 1.7 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, and the obligations and proposed requirements submitted with the application for DCO and seeks to reflect the comments and views of parish councils, local interest groups and the public.

2.0 Structure

2.1 In order to provide consistency and clarity for the examination process, the structure of the LIR has been set out below.

- Site Description and Surroundings/Location
- Historical background – a brief history of the Marston Vale
- 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
- Compulsory Acquisition
- Design, Layout and Visibility
- Development Consent Order (DCO)
- Economic and Social Impacts
- Environmental Impact Assessment
- Environmental Issues
- Habitats, Ecology and Nature Conservation
- Historic Environment
- Operational
- Transport and Traffic
- Health Issues

3.0 Site Description and Surroundings/Location

- 3.1 Rookery Pit is centrally located within the Marston Vale midway between Bedford town to the north and the M1 motorway to the south.
- 3.2 The Development Consent Order primarily relates to the southern portion of Rookery South Pit, Green Lane. The site is directly to the south of the Covanta Resource Recovery Facility, which is subject to a separate DCO, published in 2011.
- 3.3 The operational area of the site is located within Rookery South Pit and lies wholly within the Central Bedfordshire Council (CBC) area. The site access road up to Green Lane lies within CBC whilst the southern section of Green Lane from south of the Stewartby Lake sluice is partially within Bedford Borough Council (BBC) and CBC land. The northern section of Green Lane from the Stewartby Lane sluice is wholly within BBC.
- 3.4 The Gas Connection and Electrical Connection are visible within the Works Plan Key Plan (drawing number J0008128-200 Rev.G). The connections would extend from Rookery South Pit into agricultural land to the south.
- 3.5 Rookery North Pit, which lies outside the DCO area, is split between both authority areas with the western section being in Central Bedfordshire and the western section being in Bedford Borough.
- 3.6 Stewartby model village is located directly to the north of Rookery North pit and is within Bedford Borough.
- 3.7 To the east and west of the Rookery Pits are railway lines. There is the Marston Vale Line to the west and the 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. Both the Forest Centre/country park and Stewartby Lake lie within Central Bedfordshire.
- 3.8 The village of Marston Moretaine lies to the west of the Forest Centre and country park, and is bounded by the C94 to its west. This village is within Central Bedfordshire.
- 3.9 The Vehicle Proving Ground, Lidlington and Millbrook villages lie to the south of Rookery Pits and are also within Central Bedfordshire.
- 3.10 The nearest occupied property to the site is South Pilling Farm which is situated between the south-western section of Rookery South Pit and the Marston Railway line. It is approximately 200m. to the south west of the operational area. This is within Central Bedfordshire.
- 3.11 To the north of Green Lane, opposite Stewartby Lake and Rookery North Pit lies the redundant brickworks. This area is likely to be redeveloped in the future probably for residential and commercial development. To the west of

this area, up to the C94, is Stewartby landfill site. Both the former brickworks and the landfill site lie within Bedford Borough.

- 3.12 It can be seen from the above description that whilst the actual operational area lies within Central Bedfordshire the remaining part of the DCO area, including the access road and junction, is split between both authority areas. Because of this there are some matters that are very specific to a particular authority whilst other aspects of the impact of the proposed development that are common to both authorities. Whenever possible the differentiation has been made about the likely impact on each authority area. However, the Forest Centre and country park are used by residents from both authority areas as are local footpaths and cycleways. Further the area has leisure opportunities which make it an attractive destination for people living further afield.
- 3.13 Please note that Plan 1 (Rookery Pit and Surrounding Area) provides a spatial context regarding the site and surrounding points of interest.

4.0 Historical background – a brief history of the Marston Vale

4.1 *Brick Making in the Vale*

- 4.1.1 In 1881 a major brick making centre began in Fletton in Peterborough, where it was discovered that below the top callow 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.
- 4.1.2 One of the largest exposures 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.
- 4.1.3 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.
- 4.1.4 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.
- 4.1.5 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.
- 4.1.6 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.
- 4.1.7 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 operation 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.
- 4.1.8 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.

- 4.1.9 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.

The extent of the clay permissions is illustrated in Plan 2.

- 4.1.10 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.
- 4.1.11 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.
- 4.1.12 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

4.2 *The historical legacy of the brickmaking industry*

4.2.1 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.

4.3 *Landfill*

4.3.1 The extraction of clay in the Marston Vale led to the presence of substantial clay voids. Following the end of working the land for brick clay, 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.

4.3.2 Residents were adversely affected by increased HGV traffic; 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. These impacts on their daily lives are still fresh in the minds of many local residents.

4.4 *Emissions and Pollution*

4.4.1 The operation of the brickworks resulted in the release of noxious gases caused by the high sulphur content of the clay. As a result, smoke and gases which were discharged via the brickworks chimneys into the atmosphere when the bricks are fired.

4.4.2 The two most significant compounds were the sulphur and fluoride compounds and the 'mercaptans' which cause an offensive burning rubber type odour.

4.4.3 Environmental legislation forced the old-fashioned brickworks to be upgraded during the 1990's. More than £31M was spent on Stewartby brickworks 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 which resulted in the brickworks closing in 2008.

4.4.4 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.

4.5 *Stewartby Model Village*

4.5.1 Halley Stewart expanded Forder's works at Wootton Pillinge 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 garden village for the works employees. This was later renamed Stewartby in honour of Sir Halley Stewart, who died in 1936. Stewartby is a model village that was built to house the workers from the brickworks and also made provision for those of retirement age. Construction started around 1938. It had its own village facilities. 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 men's club and numerous other amenities. There were also various welfare, pension, and profit-sharing schemes.

- 4.5.2 The village was built primarily to house workers at the brickworks and their families. 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 created by the brickmaking operations on local residents. The discomforts of living in a malodourous environment where the smoke from the numerous chimneys could be clearly seen was 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.

4.6 *The Future*

- 4.6.1 Clay extraction has now ceased and the brickworks have closed. Landfill activities are also drawing to a close. Brogborough landfill site stopped taking in waste several years ago and is now being restored. Stewartby landfill site is only taking in restoration soils and is being progressively restored to agricultural land. There are still considerable areas of un-restored land from the former brick manufacturing activity in the Vale. However, the area as a whole is being regenerated. Local residents were 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 restored for beneficial purposes.
- 4.6.2 However, Rookery South Pit is subject to a separate DCO, which came into force in February 2013, for the Covanta Resource Recovery Facility. Therefore, although landfill activities are drawing to a close, large volumes of waste will continue to be imported into the area for waste treatment.

4.7 *Lakes*

- 4.7.1 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.

4.8 ***Marston Vale Community Forest***

- 4.8.1 The Forest of Marston Vale is an initiative to develop a combination of woodlands, wetlands, and public open spaces, 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 which begun to be developed since 1990, with the aim of regenerating the landscape of this area, promoting biodiversity, and improving public access.
- 4.8.2 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 and the proposed use of Quest Pit for the Nirah development. The restoration of sites and the creation of new development has had a positive effect on local resident's perceptions of the area.

Plan 3 illustrates the extent of the Forest of Marston Vale.

5.0 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

5.1 ***The Core Strategy and Development Management Policies Development Plan Document*** was adopted in November 2009. The vision, objectives and policies in the Core Strategy provide an overarching approach that supports the more detailed policies in the Development Management Policies, which sets out the policies against which planning applications for the use of land and buildings will be assessed.

5.2 ***The Emerging Local Plan (2018)*** has reached pre-submission stage. The pre-submission consultation on this document ended on 22 February 2018.

Other relevant plans and strategies for the area include:

5.3 ***The Forest of Marston Vale Plan*** published in 1995 sets out objectives for the Forest of Marston Vale Community Forest, which is one of twelve 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.

5.4 ***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.

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

5.5.1 The following sites have been designated within the Central Bedfordshire Site Allocations Development Plan Document. Whilst there are no sites which will be directly affected by the proposal, it is clear that there is the possibility that a number of sites may be indirectly affected, particularly by vehicle movements and potentially noise, odour and other amenity issues. These include:

- Land South of Wixams (MA3) - 1000 dwellings and 5ha Employment land – This development has not been started.

- NIRAH (EA8) – This planning permission, which was linked to the allocation of the site within the Site Allocations DPD, has now expired.
- Land at Moreteyne Farm, Marston Moretaine (MA4) - 125 dwellings, 7ha B1, B2 and B8 and the possibility of 320 dwellings as a contingency – This development is under construction.

6.0 Impacts of the Project

6.1 *Compulsory Acquisition*

6.1.1 The Local Authority is not aware of any local issues in relation to this topic.

6.2 *Design, Layout and Visibility*

6.2.1 The development, due to its scale and location, would have a major landscape impact, and would intrude into valued views from Ampthill Park and from other sites on the Greensand Ridge.

6.2.2 The site is currently set within a landscape setting of productive farmland and the Millennium Country Park. It is accepted that the current setting would be impacted by the Covanta Resource Recovery Facility, to the north. The Proposal, coupled with the Covanta Resource Recovery Facility, would present a more industrial setting. Requirements 3 and 4 of the draft DCO identifies the need for landscaping works, which may significantly mitigate this issue.

6.2.3 The impact to the landscape should also be considered alongside any benefits arising from the proposal. For example, the removal of pylons may be considered to improve the landscape.

6.3 *Development Consent Order (DCO)*

6.3.1 There are concerns about how the various impacts will be mitigated, monitored and controlled through an appropriately worded DCO.

6.4 *Economic and Social Impacts*

6.4.1 It is felt that there may be some positive impact on the local area in respect to the creation of jobs both during construction and the operation of the plant.

6.4.2 These positive impacts need to be considered against any negative impacts. Such a large facility may well have a negative impact 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.

6.5 *Environmental Impact Assessment*

6.5.1 The assessment process has been generally comprehensive although some detailed concerns remain with aspects of the visual assessment and air quality.

6.6 *Environmental Issues*

6.6.1 Representations have raised concern regarding the impact to the environment. These comments highlight that the development would present

an impact in terms of increased levels of pollution, including noise and odour. In relation to noise, it is noted that the proposed construction hours, during which noisy works can take place, are outside of those which Central Bedfordshire Council would normally consider acceptable.

- 6.6.2 Representations have also raised concerns regarding impacts from the proposed development upon air quality.
- 6.6.3 Specifically, the generation of Carbon Monoxide, Nitrogen Oxides and greenhouse gases, has been suggested as a significant issue by representations. Marston Moretaine Parish Council have also raised issue regarding the environmental impact and the potential increase of ground levels of Nitrogen Dioxide. The Parish Council are concerned that this could present a subsequent detrimental impact subsequent upon environmental habitats and upon both human life and wildlife.
- 6.6.4 Concerns have also been raised regarding the impact in terms of contamination and impact to ground water.

6.7 *Habitats, Ecology and Nature Conservation*

- 6.7.1 It is noted that several representations have been received that have raised concerns regarding the impact to the Forest of Marston Vale, the Millennium Country Park and the Rookery Clay Pit County Wildlife Site. Due to the scale of the proposal and the close proximity of the development to several areas of important ecological interest, this is a matter of significance.
- 6.7.2 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.
- 6.7.3 The development may present opportunities to provide ecological value, for example through screen planting and additional habitats.

6.8 *Historic Environment*

- 6.8.1 Representations have highlighted concerns regarding the existence and operation of the generating station, and its impact to designated heritage assets, such as listed buildings and parks.
- 6.8.2 The development, and in particular the gas and electricity connections, is likely to impact archaeological remains outside Rookery Pit South. Requirement 9 of the draft DCO suggests mitigation in response to this issue.

6.9 Operational

- 6.9.1 It is noted that an Environmental Permit has already been applied for the project.

6.10 Transport and Traffic

- 6.10.1 The principle access for the Project would be accessed via Green Lane. 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 height is restricted by a railway arch.
- 6.10.2 As the Green Lane access is proposed to be shared with the Covanta Resource Recovery Facility, consideration should be paid to the cumulative impact upon traffic, construction traffic movement, road safety, routing and footpath management.
- 6.10.3 Representations have highlighted the need to consider the impact the development would have on heavy loads and whether the proposal would have any impact to heavy load routes.
- 6.10.4 Marston Moretaine Parish Council have also raised concerns in relation to traffic and traffic noise. The Parish Council have requested that the access route for construction traffic exits the A421 dual carriage way at Marsh Leys interchange, and not Beancroft Road roundabout, Marston Moretaine. This has been raised by the Parish Council to ensure that there is no disruption to local traffic for both entering and exiting the village at either Beancroft Road or Bedford Road and to also protect the amenity of local residents from vibration and noise.

6.11 Health Issues

- 6.11.1 It is noted that several representations have raised concerns regarding the impact to public health. It is noted that the supporting documents, such as the Environmental Statement, have considered this matter. This has done little to ameliorate the concerns of local residents in respect to the potential health impacts of the proposed facility. This is particularly because many residents can recall the effect on their health of living in the vicinity of the brickworks which spewed out noxious malodourous gases and smoke. Many residents experienced respiratory illnesses, including asthma, which they consider were linked to the operation of the brickworks and which only improved when the works closed. The residents do not want to return to this sort of situation.
- 6.11.2 Local residents not only have the experience of the emissions from the brickworks but also of the odour emanating from the waste landfilled at Brogborough, Stewartby and other sites in the Vale. There is also the perceived health impact of the proposed facility. It will be visually intrusive and residents will be aware that it is nearby. Seeing views of the facility every day will be a constant reminder to residents that their health could be harmed by the emissions from the facility. Some illnesses

may be generated of a psychological nature if not actually caused by the emissions themselves.

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