

BEDFORD BOROUGH LOCAL PLAN (2030)

EXAMINATION IN PUBLIC

HEARING STATEMENT

MATTER 7
ALLOCATIONS FOR DEVELOPMENT IN BEDFORD,
URBAN EXTENSIONS, FORMER STEWARTBY
BRICKWORKS & AT ROXTON
(POLICIES 22-25 & 28)

ON BEHALF OF CLOUD WING UK LIMITED

APRIL 2019

1.0 INTRODUCTION

1.1 This statement responds to the Inspectors 'Matters Issues and Questions for Examination' in respect of Matter 7. Specifically, the submission provides comment on the following questions with regard to the former Stewartby Brickworks (Policy 25):

- Question 7.1: Are the following allocations for new development soundly-based; are the criteria set out in the relevant policies justified and effective; and is there evidence that the development of the allocations is viable and developable during the plan period?

- Question 7.2: Are the detailed requirements for each of the allocations clear and justified? Have site constraints, development mix and viability considerations been adequately addressed? Are the boundaries and extent of the sites correctly defined?

- Question: 7.3 Should the plan identify approximate dwelling numbers (and the amount of other uses) for these sites? Is the approach taken to identify the capacity of these sites appropriate?

2.0 MATTER 7 – ALLOCATION OF STEWARTBY BRICKWORKS

Question 7.1: Is the allocation for new development soundly-based; are the criteria set out in the relevant policy, justified and effective; and is there evidence that the development of the allocations is viable and developable during the plan period?

Soundly Based

- 2.1 Yes, the allocation of the former Stewartby Brickworks site is soundly based.
- 2.2 The site comprises previously developed / Brownfield land and is located in a sustainable location to the south of Bedford within the Marston Vale. It is dissected by the existing Bletchley to Bedford rail line which is to be upgraded to accommodate the east / west rail service between Oxford and Cambridge. Stewartby railway station adjoins the sites southern boundary. In addition to rail infrastructure the site lies adjacent to the A421 Oxford to Cambridge expressway.
- 2.3 As set out in our submission in respect of Matters 1b and 3, the National Infrastructure Commission (NIC) places Bedford at the centre of the Oxford to Cambridge Growth Arc and advises that across the corridor the aim should be a doubling of housebuilding rates to deliver “one million new homes by 2050”. Very specifically the NIC’s November 2017 report states that there should be:
- “concentrated **growth in the Marston Vale** between Milton Keynes and Bedford, focused around **a few key rail nodes** in the area, and providing the critical mass to expand local services”*
- &
- “major development around Bedford, supported through the introduction of **East West Rail services and the wider connections that exist via the Midland Mainline**”*
- 2.4 It is difficult to envisage a more appropriate site than the former Stewartby Brickworks in the context of these NIC recommendations given its location within the Vale, south of Bedford, adjoining a railway station and with direct access to the A421 expressway.
- 2.5 Not only will the development of the site fully accord with the NIC recommendations and general principles of good sustainable planning it will deliver the redevelopment of a Brownfield site with no current productive use or purpose.

Effective Policy Criteria

- 2.6 The proposed policy criteria are generally supported. However, we raised objection at the Regulation 19 stage to the pre-ambles to the criteria in the policy which states that a development brief must be prepared “before a planning application is submitted.”
- 2.7 It is considered that it is not necessary to prepare a development brief ahead of the submission of an outline planning application. This has been agreed with the Council’s Development Control Department. Instead, as part of discussions with officers it has been agreed that the provision of a comprehensive Design Statement with parameter plans covering massing, density, building heights, open space / green infrastructure and access would provide sufficient detail to allow an outline application to be appropriately determined.
- 2.8 It is however the case that a development brief / design code would need to be developed ahead of the submission of a reserved matters application to provide greater guidance to those preparing such submissions. Again, through discussions with Officers it is understood that any outline permission granted for the development of the site would be subject to a condition stipulating that a design brief is prepared ahead of the submission of any reserved matters application.
- 2.9 We have therefore suggested a slight change to the wording of the pre-ambles as part of our Regulation 19 submission.

Evidence of viability and deliverability within the plan period

- 2.10 Cloud Wing UK Limited (CWUKL) is working closely with the Council to bring the site forward. In the context of the emerging local plan policy pre-application discussions were held with Bedford Borough Council during the Spring of 2018 to agree the scope of an early application and to negotiate a Planning Performance Agreement (PPA) which was signed in July 2018 to guide the preparation and consideration of an outline planning application. A formal Scoping Opinion request under the Environmental Impact Assessment Regulations was lodged with the Council in July 2018 with the written response provided on 28 September 2018. Responding to the feedback received an outline planning application for the site, (with all matters reserved other than access), was submitted at the end of November and validated in December 2018.

- 2.11 The formal public consultation period has now ended with the responses received from both statutory consultees and local people now being reviewed. The local response has been positive with the focus primarily on how the site comes forward and what can it deliver for local people. Where appropriate, contact is now being made with the statutory consultees and meetings held to address any issues which have been raised or to clarify any elements where further information has been requested.
- 2.12 In addition to the main outline application, as a result of health and safety concerns, in January 2018, Bedford Borough Council resolved to grant listed building consent for the demolition of the site chimneys and internal kiln structures (excluding the outer kiln walls). The consent has now been issued following the signing of a S106 agreement and submissions have been made to discharge the associated pre-commencement conditions requiring a photographic record of the chimneys for heritage purposes and the agreement of the demolition strategy. The ability to demolish the chimneys will remove a longstanding safety concern and so will significantly speed up site reclamation works as part of the redevelopment.
- 2.13 Alongside progress with these formal planning and listed building applications, CWUKL is also progressing detailed site work to develop strategies for reclamation of parts of the site where this is required as a result of the former brickworks operations and the design and delivery of necessary site infrastructure.
- 2.13 As may be appreciated as a result of the above CWUKL has invested significantly in the site which we consider this work very clearly demonstrates intent to develop the site and viability of doing so.
- 2.14 In terms of the speed of delivery from the site, the Council has adopted a very cautious approach. Representations have been made at the Regulation 19 stage regarding the estimate of just 100 dwellings in the period to 2030. It is understood that the dwelling estimate was set prior to the progress outlined above i.e. the consent for the chimney demolition being obtained and the preparation of outline planning application. It is considered that a more realistic, yet still cautious, delivery rate from the site based upon commencement in 2021 is 700 homes in the plan period.

Question 7.2: Are the detailed requirements for each of the allocation clear and justified? Have site constraints, development mix and viability considerations been adequately addressed? Are the boundaries and extent of the sites correctly defined?

- 2.15 Other than our comments above regarding the need for a development brief to be prepared prior to the submission of any planning application which has been agreed as not required in support of an outline application, it is considered that the requirements of the policy are reasonably clear and justified.
- 2.16 The policy takes account of the site constraints and requires appropriate information is provided as part of application submissions in relation to ground conditions, site heritage, neighbouring uses and flood risk and drainage.
- 2.17 The site boundaries have been correctly defined.

Question: 7.3 Should the plan identify approximate dwelling numbers (and the amount of other uses) for these sites? Is the approach taken to identify the capacity of these sites appropriate?

- 2.18 The plan does identify a target dwelling figure for the site of 1,000 new homes in Policy 3S. In terms of the quantum of other site uses Policy 25 is clear that the site should deliver a new primary school. The policy then retains flexibility in terms of the exact quantum of other associated service and employment uses. It is considered that this is a reasonable approach and provides flexibility to allow development to respond to needs and demand at the point where detailed applications are made.
- 2.19 In terms of capacity, the site comprises 55 hectares. As a headline the estimate of 1,000 dwellings gives a density of just 18 dwellings per hectare. However, when the need to deliver a school and to retain and respect the listed outer kiln walls and their setting it represents a realistic estimate for the site.