**BEDFORD BOROUGH LOCAL PLAN**

**CALL FOR SITES**

 **Supporting Statement**

**Bedford Rugby Club (Bedford Blues Ltd)**

**August 2020**

1 This statement is made on behalf of Bedford Rugby Club (Bedford Blues Ltd) in support of a proposed sustainable housing development of 154 dwellings on land to the north of Goldington Road Bedford as shown on the attached location plan.

2 The Goldington Road site is approximately 2.47 hectares in size and incorporates the present rugby club, training pitches and car park. The ground has a capacity of around 5000. It is bounded on the eastern side by housing on Goldington Avenue, to the north by the Health Village, to the south by new flats and to the west by a care home.

3 The sites is situated within the urban area of Bedford, which is the most sustainable location for new development, and in the context of nearby uses the Goldington Road site has potential to be developed for residential uses to facilitate the reorientation of the ground.

4 The Bedford Borough Local Plan Review Issues and Options identifies a need for 5000 to 15000 new dwellings in the period to 2040, and 9000 to 21000 in the period to 2045 and in any development strategy there will need to be provision made for development to take place within and adjoining the urban area as the most sustainable location for development. Policy 45 of the current adopted Local Plan makes provision for 2647 dwellings to come forward from the urban area of which nearly 1900 are expected to be delivered by 2030, notwithstanding the criticism from a number of representors at the Local Plan Examination, that some of the allocations in the Local Plan had been carried over from earlier plans, but had not come forward, and were therefore not deliverable. The proposed development of the Rugby Club ground would help meet any shortfall.

5 Bedford Rugby Club (Bedford Blues) has a long and distinguished history. The Club can trace its roots back to shortly after the Rugby Football Union was formed in 1871. In 2011 the club celebrated its 125th anniversary. The Club enjoys considerable local support with attendances better than many lower division football league clubs. The Club play in the Championship which is the second tier of English Rugby. The Club have regularly been highly placed in this division but promotion to the Premiership would be prevented by RFU requirements relating to ground capacity and the physical size and slope of the pitch and until recently there was also an additional obstacle regarding control of the ground, which is owned by The House of Industry, a charity administered by the Borough Council, but following a recent High Court case, this is no longer a RFU requirement.

6 During the preparation of the current Local Plan, the Club promoted a scheme for the development of the Ground which would meet the RFU criteria for promotion which is a level pitch and a 10,000 seater stadium. To enable the redevelopment of the ground funding was anticipated from enabling development of 154 flats and health care facilities as part of the Health Care Village on the adjoining land to the north. The scheme provided for repositioning the pitch on a north south axis, with housing of a similar scale towards the existing flats on Goldington Road and the elderly persons housing to the west. The redevelopment proposals were included in the Adopted Local Plan as an Opportunity Site to which Policy 26 applies. This says:

*Within the urban area a number of opportunity sites have been identified that have redevelopment potential for housing development. These are described in Appendix 7. The Council will work with land owners and other interests to investigate such opportunities and bring them forward through the development management process*

 The text in Appendix 7 says:

 *There may be an opportunity to improve the major leisure facility at the Rugby Club, Goldington Road, Bedford and at the same time deliver new housing close to the town centre. The size of the rugby pitch and stadium capacity does not meet the standards that would allow promotion of Bedford to the top division in the rugby league. The Club wishes to improve its facilities and has sought policy support for some enabling development on the site. However, at the current time there is not sufficient certainty that the site is available for development. More detailed design work will be required in relation to the impact of development on the adjacent listed building, conservation area and of noise on nearby residents on match days. Existing schools in the area have capacity to serve the development.*

 There is therefore no objection in principle to the redevelopment of the Goldington Road site, but an allocation is required so that prospective developers can be assured that the scheme will attract the support of the Council. Reliance on the Development Management process would be prohibitively expensive for the Club and be inherently uncertain without the clear support of policy.

 7 The provision of new sports and leisure facilities is covered by Policy 97 of the Adopted Local Plan. It says

 *Planning permission for new sports/leisure facilities (including indoor and outdoor facilities) will be granted where:*

 *i. It is demonstrated that the location is suitable for the proposed facility and*

 *ii. Provision is made for access for users travelling by foot, cycle and public transport and*

 *iii. There is no adverse effect on the highway network or the amenity of local residents and*

 *iv. Any outdoor lighting is positioned to illuminate the area required and not to cause light spill beyond the site and/or the sports pitch or leisure facility and*

 *v. It is demonstrated through a robust assessment of existing and future need for indoor/outdoor sports facilities, that the proposed facility or facilities are meeting an identified need for such facilities and*

 *vi. Any new facilities are constructed to have regard to Sport England/NGB technical design guidance, to ensure new facilities are fit for purpose*

 Clearly, the proposed rearrangement of the ground satisfies all these policy criteria.

8 The scheme has been assessed against the policies in the National Planning Policy Framework 2019 regarding sustainable development. In relation to the NPPF, Para 7 refers to the purpose of the planning system being to contribute to the achievement of sustainable development, and that the policies have to be taken as a whole. That is reinforced by what is said in para 8 about the three objectives of sustainable development – economic, social and environmental, which are interdependent. This is further reinforced by what is said in para 11 about the presumption in favour of sustainable development. That the partial development of the Rugby Club for housing satisfies the requirements for sustainable development was demonstrated by the inclusion of the site as a Preferred Site in the Consultation on the current Local Plan, because it came top in the Council’s own Site Assessment and Potential Options for Allocation, where it scored the highest scores possible.

 9 Question 6.1 of the Call for Sites Submission Form requires details of how the proposal will respond to climate change since Policy 51S of the Local Plan says

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|  *The Council will require the development and use of land and buildings to address climate change,* *adapting to anticipated future changes and mitigating against further change by reducing* *greenhouse gas emissions*  |

 10 The scheme will satisfy the requirements of Policy 53 because the principles of sustainable design and layout will be incorporated and it will be located to provide convenient access to local services by foot, cycle and public transport, and use design, layout and orientation to maximise natural ventilation, cooling and solar gain, and incorporate landscaping and open spaces, including suitable street tree planting

 11 Energy efficient buildings will be developed so that the new residential development will achieve a 19% reduction in carbon emissions below the Building Regulation requirement and the new non-residential developments will achieve a 10% reduction in carbon emissions below the Building Regulation1 requirement, in accordance with Policy 53.

12 In summary, there would be no adverse environmental impact as a result of the proposed development and significant community benefit would result from meeting a clear need to improve the existing rugby facilities, provide a range of quality homes for all, which will help meet strategic requirements, and benefit the Charitable Trust.

 The development scheme will respond positively to national policy and the strategic objectives of the Adopted Local Plan, and should therefore be allocated.