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c/o Jonathan Robinson - Kirby Diamond
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MK5 6LB

Ext : 01234 718068
Email: planning@bedford.gov.uk
Date 26 June 2020

Dear ██████████

PRE - APPLICATION NO : 20/00117/PREAPP
PROPOSAL : DETAILED written: Development of land to create range of small scale industrial units within use classes B1, B2, B8, A1 with 10% office contents and associated service yard parking
LOCATION : Playing Field Adjacent Aircraft Research Association Manton Lane Bedford
Bedfordshire
MK41 7PF

Thank you for your pre-application enquiry and allowing me additional time to provide this written response.

Based on the information submitted by you I can give you the following advice which I hope you will find useful.

The site and its planning history

From the red-line plan you have provided, the enquiry site appears to consist of approximately 1.54 hectares of playing field associated with the Aircraft Research Centre (ARA) located approximately 3 – 3.5 kilometres north of Bedford town centre at the northern end of the Manton Lane Industrial Estate; the site being on the outer fringe of the Bedford urban area to the north of a series of employment units located in Murdoch Road. Whilst the industrial estate itself is identified in the Bedford Borough Local Plan 2030 (BBLP) as a key employment site ('to Protect and Maintain') it is noted that the playing field area is shown on the Proposals Map to be outside the area designated for employment purposes. The site's elevated topography allows for partial views of it from the A6 and Clapham Road to the west / north-west despite the presence of hedgerow along its western and northern boundaries.

The planning history of the ARA site would be an important material consideration in the determination of any planning application you ultimately choose to submit. In this instance, the Council's records indicate several applications relating to the ARA albeit none that appear to relate to the playing field area itself. Nevertheless, for completeness, I set this history out below for your records excluding that relating to advertisement consents.

89/01042/FUL - Erection of cryogenic laboratory workshop and storage area with LN2 tank and compound – Application permitted

99/00132/FUL - Erection of compressor housing building – Application permitted

99/00232/FUL - Erection of building to enclose existing wind tunnel – Application permitted

01/01096/FUL – Over-cladding of existing powerhouse, compressor house and installation of acoustic attenuatory to each – Application permitted

02/00832/FUL - Erection of steel frame to support compressed air receivers – Application permitted.

03/02166/FUL - Erection of gatehouse and security access arrangements – Application permitted.

03/02167/FUL - Installation of vaulted barrel rooflight – Application permitted.

03/02897/FUL - Installation of high-pressure vessel – Application permitted

04/00793/FUL - Extension to compressor house to form switch room and workshop – Application permitted

Planning, 4th Floor, Borough Hall,
Cauldwell Street, Bedford MK42 9AP

Telephone (01234) 718068 Fax (01234) 718084

05/02182/FUL - Switchroom conversion and new switch house and compound – Application permitted

05/02960/FUL - Installation of new water stilling tank – Application permitted

07/00176/FUL - Construction of transformer compound – Application refused

07/01054/FUL - Installation of transformer compound – Application permitted

09/00867/FUL - Replacement of existing 2.4m high fence with 2.7m high security fencing (300m in total) – Application permitted

Principle of development – general considerations

Before I consider the Council's adopted employment policies, I would draw your attention to some fundamental issues that could be an impediment to development in this instance. You should address these issues before you evolve your proposals any further and consider submitting a planning application.

Loss of playing field

BBLP Policy 99 sets out that the loss of existing sports and community facilities will only be permitted where either of the following can be demonstrated:

- i) Up to date evidence has been provided that demonstrates the facility is surplus to existing and future needs; or,
- ii) The facility is to be relocated and is of a similar scale to the current facility (i.e. no net loss in floor area), is of an equivalent standard and able to serve the same community.

In the case of sports facilities, alternative sports facilities might be considered as a replacement if this can be justified with appropriate evidence of need.

I have briefly conversed with the Planning Manager at Sport England who has confirmed that the site in question constitutes a playing field as defined by The Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended). In his opinion, the playing field has been used for sports purposes in recent years (confirmed by publically available aerial photographs), and therefore Sport England would be a statutory consultee in respect of any planning application you choose to progress / submit with respect to developing the site.

In Sport England's 'Playing Fields and Policy and Guidance' document (March 2018), it states that Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of (a) all or any part of a playing field, or (b) land which has been used as a playing field and remains undeveloped, or (c) land allocated for use as a playing field, unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions. I have therefore included below a link to Sport England's policy and guidance that you should fully consider. In short, if you are not able to address the requirements of BBLP Policy 99 and demonstrate that your proposals meet the requirements of Sport England's policy exceptions then any application you choose to submit would not be looked upon favourably by officers.

<https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/final-playing-fields-policy-and-guidance-document.pdf?WXTZnJYKUhHkAsLNfBEgtdwW1i5ndMBD>

Archaeological potential of the site

The Bedford Borough Historic Environment Record (BBHER) shows that the proposed development is surrounded by a number of known heritage assets of archaeological interest (below ground archaeological remains). Less than 50 metres to the north-east, to the east of St. Helen's Wood and in the field immediately to the north of the proposal, two gold late Iron Age Staters (higher status coins) dating to 57 - 45BC were found about 37 metres apart (BBHER

15968). These could be connected with an undated possible banked enclosure visible on a ridge of high ground as a cropmark on aerial photographs and which was mapped as part of the recent Bedford Borough National Mapping Programme project within the same field. Further distant at Manton Lane circa 700 metres to the south-east, Roman remains suggest the presence of a significant building in the nearby vicinity (EBB1017). The location of the enquiry site up slope towards the crest of the River Ouse valley was often a favoured location for late prehistoric or Roman settlement, based on excavated sites in the area.

Given the general archaeological potential of the surrounding area for prehistoric or Roman remains, the proposal site would require archaeological pre-determination evaluation by trial trenching in the first instance, the results of which would be used to inform the determination of any forthcoming planning application based on the proposal. Not only would this help to inform the viability of any scheme and to identify how much of the site could be developed, it would ensure that any application could be fully assessed at the planning application stage in line with BBLP Policy 41S and NPPF paragraph 189.

Highways issues

Officers are mindful that there has been / and will continue to be significant development in the Manton Lane area in the months and years to come where there are significant concerns from the point of view of highway safety and impact upon the local highway network. Whilst this is not necessarily an impediment to development in this instance, it is nevertheless an important consideration. I will further elaborate upon highways issues later in my response.

Principle of development – employment policy

Amount and distribution of employment development

Notwithstanding the above, and turning my attention to other adopted development plan policy, I am mindful that BBLP Policy 69S states that the main focus for jobs growth is the Bedford and Kempston urban area and on employment sites that are already allocated in the development plan. The enquiry site (as already mentioned above) is located within the urban area of Bedford and immediately adjacent to existing and established employment uses where the principle of providing additional employment development within a sustainable location is broadly supported by both national and local plan policies. The wider ARA site forms part of a designated key employment site (BBLP Policy 70); its role and function to contribute to the economic function of the borough by virtue of its protection and possible further extension. However, extension of such sites will only be supported where it can be sufficiently demonstrated that:

- i) The development would be ancillary or complementary to the existing or proposed 'B' class activities of the employment area, and,
- ii) The proposal, cumulatively with other non-B class uses, is proportionate in scale to the overall defined employment area to ensure that it would not detract from the site's primary employment purpose, and,
- iii) There is no unacceptable impact on the operation of the defined wider employment area, and,
- iv) The proposal would not have an adverse amenity impact.

These are matters that would need to be fully addressed as part of any planning application you choose to submit. Furthermore, notwithstanding what I have already set out in this response, you would also be advised to give full consideration to the following technical issues if you choose to progress your proposals.

Visual impact and landscape

Setting aside for one moment that we are considering the principle of development at this stage, you should nevertheless consider BBLP Policy 29 that requires new development (in part) to be (i) of the highest design quality and to contribute positively to the area's character and identity, (ii) respect the context within which it will sit and the opportunities to enhance the character and quality of the area and local distinctiveness, and (vi) promote a sense of place. Furthermore, BBLP Policy 30 should be referenced. This policy reinforces the requirements of BBLP Policy 29 stating that development proposals should take account of the principle of good design.

Buildings within Manton Lane and the larger industrial estate are relatively well spaced within their plots and broken up into clusters of units. Any proposal you choose to progress would need to (if the concerns set out at the start of this response could be overcome) maintain a degree of space between it and surrounding commercial / employment buildings and not occupy an amount of the site that would be considered to represent overdevelopment or have a harmful visual impact.

Turning to the scale of the development, any proposed new building would need to take full account of the immediate local context, and the need to keep the height of buildings to a minimum particularly considering wider vantage points to the west and north. Wider views of the site should be considered from all directions including from the south along Manton Lane / Brickhill Drive. Whilst the enquiry site is located within the urban area of Bedford more distant views of the proposed development would be available from the west / north-west of the site from Clapham Road to the south of Clapham and the A6. These long views are across open countryside (although it is accepted that a proposal to relocate Rushmoor and St. Andrews Schools to land west of Manton Lane has recently been allowed on appeal and will in future reduce these open views) and would be reduced. Paragraph 170 of the NPPF requires development to recognise the intrinsic character and beauty of the countryside. This is reflected by BBLP Policy 37 that requires development to protect and enhance the key landscape features and visual sensitivities of the landscape character areas identified in the Bedford Landscape Character Assessment (May 2014).

It might be possible to design a scheme that could have an acceptable impact when seen against the backdrop of the existing industrial estate, but I cannot impress too heavily that you are likely going to need to curtail your expectations (if indeed you can overcome the earlier concerns of this response) due to the need to minimise the height and scale and possibly footprint of any new building in this location to ensure any new development does not appear visually prominent / overbearing or unreasonably dominate the skyline. To this end, if you were to submit an application, at the very least it would be expected for the submission to be supported by a Landscape and Visual Impact Appraisal which would incorporate an assessment of all appropriate visual receptors including local public rights of way such as Bromham Bridleway BW6. I would also expect drawings to be provided detailing full elevational treatments of any new building and the palette of materials that would be used and showing how the design of the buildings would reduce their visual impact on the surrounding area and create interest in what could otherwise be large and bulky buildings. I would also expect to receive details of a robust landscaping scheme to reinforce existing boundary treatments and to further reduce the skyline impact of the proposals from the west and north-west.

Impact on neighbours

Any development of the playing field would be approximately 600 metres distance from the nearest residential properties on Brickhill Drive / Manton Lane to the south and 400 metres from the rear gardens of properties in Curlew Crescent to the east. If any new building was kept to a low height to address matters raised above, it would unlikely be visible from surrounding houses, the lateral separation, intervening buildings and the presence of the Parkwood Local Nature Reserve and allotments to the east of ARA and the Manton Lane Industrial Estate ensuring that any development would not unreasonably impact on local residents in terms of loss of outlook, privacy or light.

You would nevertheless still be expected in accordance with BBLP Policies 32 and 47S to submit noise and air quality assessments and an external lighting scheme in support of any application you choose to submit which would set out assessments of how the proposed employment development would not unreasonably impact upon the area, particularly in respect of HGV movement, light spillage, and the use of plant and how this might give rise to disturbance / pollution impacts with respect to neighbouring premises / residential development in the area.

Highway impacts (including waste servicing and provisions and emergency access)

Vehicular access would need to accord with Bedford Borough Council Standards and a safe crossing would be required to create an extension to the footway and cycleway on the eastern side of Manton Lane to join the newly approved footway and cycleway.

A full transport assessment would be required to test the impact of the development on the local highway network, including the Brickhill Drive signals. This needs to take in to account the recently permitted nearby developments including Rushmoor School and the redevelopment of the Reservoir Site. The Council have a model that we can allow access to at a cost.

Sufficient on-site car parking in this location is very important as the surrounding area currently suffers with lack of parking and displacement of vehicles off-site would not be accepted. All parking must meet current Bedford Borough

Council Parking Standards 2014 and dependent on layout and predetermination of each unit's usage class, the requirements may vary. If the units are not to be individually classified then all parking requirements would fall under the highest use class. Page 23 (onwards) of the Bedford Borough Council Parking Standards 2014 provides more information regarding this.

All on-site spaces would need to meet the dimensions required of a minimum of 2.7m x 5m without any obstructions. Any vertical or horizontal obstructions would increase the width or length required by 0.5m respectively. Please refer to the Bedford Borough Council Parking Standards 2014 Page 8 onwards.

HGV parking would also be required on site. The quantity would be determined by the use class of each unit respectively however any reduction would only be acceptable with evidence to support this.

Sufficient cycle parking would be required on site for all units. Both long-stay and short-stay cycle would need to be accommodated and would be dependent on unit classification. If the units are not to be classified individually then the highest use class would be used for calculations. Details of this can be found in the Bedford Borough Council Parking Standards 2014 page 41 onwards.

Careful consideration needs to be taken with regard to waste storage and collection across the site. Developers should design multiple storage areas that enable the storage of all wastes within the confines of each units premises in suitably designed and enclosed facilities. As a general rule, every development should be provided with adequate space in which to store separate containers for waste and recyclable material.

Alternatively, a site approach could be considered, if a site management plan is implemented, whereby each unit contributes towards one collection service for waste and recycling across the site as a whole. Further information must therefore be provided regarding waste servicing and provision across the site as part of any future application. In all cases, safe and convenient access should be provided for refuse collection vehicles (and emergency vehicles). Developers should design access routes so that Refuse Collection Vehicles (and emergency vehicles) should not be expected to reverse a distance in excess of 15 metres in order to gain access to individual commercial units.

Notwithstanding other concerns within this response for one moment, the two main highways points of concern in this instance remain as waste storage and access thereto and fire tender access. Any forthcoming layout would need to enable RCV's and emergency vehicles to access all parts of the site with the ability to turn around with ease with minimal reversing. In addition, waste storage would need to be accessible for all users and individual waste areas.

Flood risk and drainage

BBLP Policy 92 (Flood Risk) states that in considering new development water management and flood risk must be addressed. Following on from this BBLP Policy 93 (SuDS) sets out how all development proposals must incorporate suitable surface water and foul water drainage systems appropriate to the nature of the site; surface water drainage needing to be in accordance with the SUDS SPD. I would strongly urge you to have full consideration of this SPD if you choose to progress your proposals and to this end I provide a link to it below. If the Council's Flood Investigation Officer, the Environment Agency and Anglian Water were to object to your proposals this could be an impediment to further development of the ARA site.

<https://edrms.bedford.gov.uk/OpenDocument.aspx?id=SE%2fYvEcHkpieCiSGAkjD9w%3d%3d&name=SuDS%20SPD.pdf>

Ecology

Setting aside again earlier matters in this response for one moment, any application you choose to submit would need to be supported by an Ecological Assessment. The assessment would need to clearly set out the methodologies used in compiling the assessment, provide desk study results particularly in respect of bats, badgers, hedgehogs, birds, reptiles, amphibians and invertebrates, and set out proposed mitigation for known impacts and proposed habitat enhancements. If such an assessment were not to be submitted your proposals would be in conflict with the need to accord with BBLP Policy 42S (Protecting biodiversity and geodiversity) and 43 (Enhancing biodiversity) and in that instance officers would unlikely support the application.

Climate Change and Energy

BBLP Policy 51S (Climate change strategic approach) requires 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. BBLP Policy 52 (Water demand) requires all new development to minimise the use of water and in most instances achieve the higher water efficiency standard in the Building Regulations. BBLP Policy 53 (Development layout and accessibility) requires all development to take available opportunities to integrate the principles of sustainable design and layout into proposals. Finally, BBLP Policy 54 (Energy efficiency) goes on to set out how all new non-residential developments above a threshold of 500 square metres need to achieve a 10% reduction in carbon emissions below the normal requirement set by the Building Regulations; the current approved document in this instance being Approved Document L2A: Conservation of fuel and power in new buildings other than dwellings, 2013 edition.

With regard to the above, any application you ultimately choose to submit would need to be supported by an Energy & Sustainability Report addressing the above matters. Of course, these are secondary matters to the other issues raised in this response which have a more fundamental impact on the acceptability of any proposal to develop the existing playing field. They should however not be overlooked.

S106 obligations

BBLP Policy 86S (Delivering infrastructure) states that new development will be required to provide, or contribute towards the provision of, measures to directly mitigate its impact on existing infrastructure, which will be normally secured through the use of site specific planning obligations and / or Community Infrastructure Levy payments as permitted by regulations. Development proposals will need to clearly demonstrate that the infrastructure needed in accordance with the Council's standards, included in the adopted development plan and with reference to Supplementary Planning Documents (including the Council's Planning Obligations SPD 2013), can be provided and phased to support the requirements of the proposed development. In those instances the Council will work with developers to seek to ensure that the most appropriate and beneficial solution is achieved.

At this stage as it is clear to me that your proposals still need to evolve it is difficult for me to categorically say what obligations would be required in this instance. Similar proposals elsewhere have for example, secured contributions / the provision of infrastructure with regard to highways and transportation improvements and green infrastructure. I would suggest that this would be a subject that would form part of any 'follow-up' planning advice enquiry you choose to submit if you indeed progress your ideas and once your proposals have been firmed up.

Potential validation requirements

With respect to submitting a planning application (if you are still minded to do so having regard to the content of this response) I have provided below a link to our website where you can find both the application form you would need and our additional supporting documents list in a pdf document. If you have any queries or are unsure what you would need to provide please do let me know.

<http://www.bedford.gov.uk/planning-and-building/apply-for-planning-permission/planning-application-forms/>

In addition to the standard requirements I would expect to see submitted (location plan, site plan, elevation and floor plans, design & access statement, planning statement etc.), and due to the nature of the site and the potential for any proposal to have a significant visual and landscape impact, you should give consideration to providing a Landscape and Visual Impact Appraisal incorporating photomontages that would indicate how the development would appear from various key vantage points. Any application should also be supported as a minimum by:

- An external lighting schedule;
- A noise impact assessment;
- An air quality assessment;
- Swept path analyses demonstrating in particular that the Council's RCV (and a fire engine) could enter and exit the development in forward gear;
- Full details of any new formal junction with Manton Lane demonstrating the required visibility and showing the radii to be used, the use of tactile paving either side and road markings and signage as appropriate;
- A heritage statement incorporating the findings of an archaeological pre-determination evaluation of the site;
- A surface and foul water drainage strategy in accordance with the Council's adopted SuDS SPD;


- A waste audit;
- A sustainability statement including an energy audit;
- An environmental desk study that considers the potential for the site to be contaminated (as appropriate);
- An ecology report to include details of how net gain would be achieved;
- Arboricultural and hedgerow assessments (as appropriate); and,
- A construction management plan.

Of course the above list should not in any way be necessarily treated as being exhaustive. If you have any queries on the level of information you would need to provide as part of any planning application then please do not hesitate to contact me.

Conclusion

Within this response I have attempted to set out the key issues that should inform any further evolution of your proposals if you still intend to submit an application for employment development of the existing playing field at ARA. However, for the reasons I set out above I am of the opinion that there are some fundamental issues relating to loss of the playing field and the potential for significant underlying archaeology that should be addressed before you choose to evolve your proposals any further and before a formal application is submitted.

I would expect any scheme formally submitted to have been informed by the advice contained within this response. In the absence of a scheme which takes on board the advice contained within this response it would be unlikely that officers would be able to support the scheme if it were to be formally submitted. I hope that what I have said will provide you useful information that will enable you to make an informed choice as to whether or not to proceed to submitting a planning application. I would also urge consideration of 'follow-up' pre-application advice before any such submission is made.

Signed: 
Date Closed: 26th June 2020

Please Note: If you wish to submit a planning application following this advice please go to www.planningportal.gov.uk for electronic submissions or www.bedford.gov.uk/planningforms to submit in paper (please select the correct form for the proposed development for example a FULL application (material changes of use, non- householder development and erection of dwellings) would be Form 4 and a Householder (without Listed Building consent as well) would be Form 1. Each form has a description of the types of development it relates to).

The response to this pre-application enquiry is based on the information/ plans/ documents submitted. It is not the responsibility of the Local Planning Authority to request additional information in order to answer your enquiry, therefore if you require further advice a new pre-application will need to be submitted and will be charged at the 'follow up advice' fee rate.

Other consents or approvals may also be necessary, particularly under Building Regulations you should check carefully before proceeding with works.

This letter contains advice based on the Council's policies as they were at the time of writing and is written without prejudice to any decision that the Borough Council may make on any subsequent planning application submitted, which will have due regard to all representations received and all other material considerations.

(For Minerals and Waste enquiries the contact details are: Minerals and Waste, Planning Team, shared service with Bedford Borough Council and Central Bedfordshire Council at Priory House, Monks Walk, Chicksands, Shefford, SG17 5TQ Telephone 0300 300 6039)