



The countryside charity
Bedfordshire

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Lisa Greenwood
Planning
Bedford Borough Council
4th Floor
Borough Hall
Cauldwell Street
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MK42 9AP

31 January 2022

Dear Lisa Greenwood

Re: Planning application 21/03303/FUL

*Removal of existing tannoys (three poles and five speakers)
and erection of new tannoy system*

College Farm Equestrian Centre Church Road Keysoe Bedford Bedfordshire MK44 2JP

CPRE Bedfordshire, wish to make the following objections for your consideration in relation to this Planning Application:

1. The current existing Tannoy system has been operating in contravention of Condition 1 of planning permission 11/02494/S73A for this site and approving the application would be contrary to the National Planning Policy Framework July 2021 (NPPF) Para's 185(a) & (b) which state:

"185 (a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and quality of life

185 (b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.....

It would also be contrary to the following BBC Local Plan 2030 Policies:

Policy 47S (ii) *“Avoid noise giving rise to significant adverse impacts on health and quality of life.....”*

Policy 7S (xii) *“All development in the countryside must not give rise to other impacts that would adversely affect the use and enjoyment of the countryside by others....”*

Policy 32 (ii) Development should take note of – *“The existing tranquillity of the area...”*

The applicant states in their **“Planning Design and Access Statement”** para 2.1 that:

“The proposal seeks planning permission for the removal of the existing tannoy system which comprises three poles and five tannoy speakers which are located just south of the arena permitted under application reference 11/02494/S73A.”

This comment does not agree with the “Decision Notice” for application 11/02494/S73A dated 22 February 2012, which states, as Condition 1 to the approval of the application, that:

“There shall be no external lighting or amplified music/address systems, permanent, mobile, or otherwise used on the site without specific grant of planning permission.”

No such planning permission has been granted that CPRE Bedfordshire is aware of.

Therefore, the use of the existing Tannoy system has been in contravention of the planning permission 11/02494/S73A granted for the development of the site in question that the applicant refers to.

1 (a). The importance of Tranquillity – BBC has set a precedent for this site and the KIEC as a whole.

The reason for the Condition not allowing a Tannoy system being attached to the planning permission, has been detailed in the “Decision Notice” and it was essentially, the recognition by BBC of the importance of maintaining the tranquillity of this rural area of Bedford Borough.

By including this Condition, BBC has agreed that a Tannoy system would damage the tranquillity of this rural area and BBC has therefore set a precedent in this respect.

It has done as required by the NPPF Para 185(b) and *“identified and protected an area of tranquillity”*.

The importance of tranquillity and the countryside as a whole, has also been recognised by the population at large both in rural and urban areas, as a means of improving people’s “health & well-being” and has been particularly sought during the current COVID 19 epidemic.

The countryside and tranquillity is indeed our “Natural Health Service”.

This area of Bedfordshire is one of the most tranquil in the Borough as can be seen from CPRE's Tranquillity Map of Bedfordshire – copy attached.

Also attached is a copy of CPRE's "**Saving Tranquil Places Report**" which has influenced government policy on the matter and aided the inclusion of tranquillity in the government's National Planning Policy Framework (NPPF).

2. An inaccurate Noise Assessment – The impact of other developments across the KIEC site which impact on the area are not included in the assessment.

The applicant's "**Noise Impact Assessment**" **26 November 2021**, has taken the current situation at the KIEC as the background noise level against which the predicted noise from the proposed Tannoy system has been assessed at various points across the site and near to a selected number of nearby properties.

However, this may not be the situation at the KIEC site as permissions for new developments on the site are currently being sought - Applications 21/02946/M73A and 21/03045/M73A are still being considered by BBC.

The latter of these 2 applications proposes a massive 411 additional temporary stables adjoining the site of this application (21/03303/FUL) with all the noise that this will generate which will be additional ambient noise, adding to the current levels very substantially indeed.

This will result in the volume of the Tannoy system having to be increased in order to offset ambient levels.

The cacophony of noise will come not only from stables and the horses but also from the many additional people associated with the temporary stables which we consider could be in excess of 800+ persons at capacity.

Planning application 21/02946/M73A will also generate additional noise.

Therefore, the very basis of the Noise Assessment is seriously flawed and cannot be taken into consideration in our view.

The noise generated by all the proposed new developments need to be taken into account in order to assess the real impact that the proposed Tannoy system will have on the noise levels that will be experienced by local residents of Keysoe.

3. The applicant states that the Tannoy system could be operated from 0800hrs to 1900 hrs, 7 days a week, 365 days a year according to the application. There are no restrictions planned.

In our view this is completely unacceptable and will destroy the tranquillity of the area for some substantial distance around due to the “ambient quietness” of this rural area.

Starting at 0800 hrs and ending at 1900hrs will also require additional external lighting in winter for which no such application has been made.

External lighting on the site is currently not allowed according to Condition 1 of the current planning permission 11/02494/S73A. See para 1 above.

As far as we can see, no controls on the volume of the Tannoy system have been proposed by the applicant and no noise monitoring systems have been suggested.

Again, this is disappointing and unacceptable in our view.

4. Alternative options - less intrusive communication systems.

In view of the imperative that tranquillity be preserved in this rural area, other alternatives to a standard, rather old fashioned, Tannoy system should be investigated by the KIEC.

A more modern and much less intrusive option might be to set up a local radio station or “Communication Hub” at the KIEC site which could be accessible to the public by mobile phone/tablet etc. or other electronic device.

Competitors and visitors could then listen to commentary of events taking place, be given instructions or provided with information etc. etc. on their own devices and not subject the surrounding Keysoe residents to unwanted noise and disturbance.

Flat screen televisions around the competition areas could also be used to transmit text only information to competitors/spectators noiselessly.

In this modern technological age it should not be necessary to destroy the tranquillity of this rural area whilst pursuing a sporting activity.

3. The issue of a large scale redevelopment of the KIEC through multiple planning applications each having an impact one upon the other.

This application 21/03303/FUL highlights the very serious issues emerging from the redevelopment of the KIEC taking place in piecemeal fashion which, as we have said in our comments regarding application 21/03045/M73A, is not in the best interests of local residents or the people of Bedford Borough.

In our view, the applicant should be encouraged by BBC to bring forward full plans for the future development of the site as they see it.

This plan should then be subject to a pre-application consultation of local residents of Bolnhurst & Keysoe Parish as recommended by Para 40 of the Government's NPPF and then, when the "Big Picture" is known and approved, individual applications can be made as and when convenient to the applicant.

Continuing on the current path will only lead to growing mistrust and distress among local residents and lengthy planning delays which are not in the interest of any party.

Yours sincerely

Gerry Sansom

CPRE Bedfordshire

Please note that in our submission in respect of the proposed development, while we have taken every effort to present accurate information for your consideration, as we are not a decision maker or statutory consultee, we cannot accept any responsibility for unintentional errors or omissions and you should satisfy yourselves on any facts before reaching your decision.