



The countryside charity  
Bedfordshire

CPRE Bedfordshire  
43 Bromham Road  
Bedford  
MK40 2AA

Telephone: 01234 880624  
Email: [info@cprebeds.org.uk](mailto:info@cprebeds.org.uk)  
[www.cprebeds.org.uk](http://www.cprebeds.org.uk)  
Registered Charity 1023435

Lisa Greenwood  
Planning  
4<sup>th</sup> Floor  
Borough Hall  
Cauldwell Street  
Bedford  
MK42 9AP

17 January 2022

### **Re: Planning application 21/03045/M73A**

*Erection of stables, wash boxes, acoustic fencing and provision of drainage, ground works and hard surfacing (part retrospective) for a temporary 3 year period from the date of the decision.*

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

CPRE Bedfordshire is responding to this application outside the normal date for response due to issues related to COVID and the Christmas holidays which has delayed our response.

We hope that Bedford Borough Council will nevertheless take our comments into account as they have done for Bletsoe & Keysoe Parish Council, the response from which was also delayed.

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

#### **1. General Comment - A history of retrospective planning applications - impact on biodiversity**

Much to the distress of the residents of Keysoe local to this site, the applicant seems to be in the habit of moving ahead with developments without first obtaining planning permission from Bedford Borough Council (BBC).

This application is one example where retrospective planning permission is being sought, another was application number 21/02946/M73A which is currently being considered by BBC.

In our view this is a very serious matter, demonstrating a disregard for the important democratic planning process in England which is designed to ensure that anyone (citizen or organisation) who may be impacted by a proposed development, or who have an interest in it, has the opportunity to make their views known to the Planning Authority before any development is approved and takes place.

In this application, as far as we can determine, it appears that much of the basic groundwork for the proposed development has already been completed despite the fact that the applicant should have been fully aware that a planning application was necessary before any work was undertaken.

This has led to the distress of Keysoe residents, particularly those living close to the site who we understand have been subjected to significant noise and disturbance from HGV's running through narrow rural access roads and from on-site construction activities over a considerable period of time.

We understand that BBC were advised some while ago by Keysoe residents of several developments on the site which they felt were completed prior to planning approval being obtained and yet, they say that no action was forthcoming from the Council until very recently.

#### **1(a) - Biodiversity loss**

It would appear from Ecological Reports (Griffin Ecology), that the development activity of the applicant with regard to this site, could have led to the destruction of important wildlife habitats and of wildlife itself.

If this is indeed the case, then at a time of a major and very serious Biodiversity Crisis in our country this would be an appalling act of environmental vandalism.

**CPRE Bedfordshire therefore suggest that it is now incumbent upon BBC to formally investigate if any of the development activity undertaken by the applicant across the entire Keysoe Equestrian Centre site without planning permission, such as that which we understand took place close to ponds which are valuable wildlife refuges, is incompatible with current environmental or other legislation designed to protect such areas and endangered species such as crested newts and others.**

**The Environment Agency should be informed if BBC find that such unauthorised and damaging development may have taken place.**

**Any disturbance/destruction of biodiversity would be in direct conflict with the BBC Local Plan Policy 42 (Protecting Biodiversity) and also Para 8.75.**

#### **2. Absence of important information to support the application**

**2(a) – Accommodation for visitors with horses - where will the owners/grooms etc. of the 411 horses using the stables stay during the time that their horses are stabled?**

Assuming that each owner has on average 2 horses and each stable will accommodate 1 horse, then over 200 people will be seeking overnight accommodation.

This number is likely of course to be very considerably higher if additional people are also included such as grooms or friends/family of owners etc. increasing the numbers per horse to perhaps 2 or 4 people – maybe more.

**This would indicate a maximum population of well over 800+ people associated with the temporary stables alone, that could be seeking accommodation over the 2 to 4 days duration of the average event. Many of these would be in addition to those currently attending events.**

**The application gives us no idea of such scale which is disappointing and unacceptable.**

Unless these people are accommodated on-site which at the moment such a number cannot be, then they will seek accommodation elsewhere.

This will mean that far from the number of daily vehicle movements to and from the site being reduced as claimed by the applicant they will in fact substantially increase compared to current levels.

Or, does the applicant intend to build additional accommodation on-site?

**If this is the intention of the applicant then a far more detailed planning application is necessary that should include the full range of facilities necessary for the stables to be used by those attending events at the Keysoe International Equestrian Centre.**

It seems to us that an application for the stables alone without the additional facilities which will enable them to be used/operated effectively is very misleading.

It would be very disappointing and contrary to the best interests of local residents and the people of Bedford Borough if the plans for the development of the Keysoe International Equestrian Centre (KIEO) were submitted in a piecemeal fashion in order that the “Grand Scheme” be disguised from public view.

**2(b). Waste Management Plan – horse manure/stable bedding material/horse urine etc.**

**The applicant has not provided a detailed Waste Management Plan (WMP) to support the application.**

**In our view this is contrary to BBC Local Plan Policy 32 which requires that:**  
*“Development proposals should ensure that they minimise and take account of the effects of pollution....”*

In view of the scale of the application, a WMP should provide detail of how the applicant intends to collect, store and dispose of the huge amount of manure and contaminated (urine) stable bedding that will be produced from the temporary stables.

Comments made in **Para 2.7 of the applicants “Planning Design and Access Statement” November 2021 (V10)** relate only to the bedding material and provide insufficient information in our view.

The average horse produces around 20Kg of manure (dung) per day – so 411 horses will produce over 8 tonnes a day. This excludes urine.

The average event duration is between 2 and 4 days – therefore, from the temporary stables alone, between 16 tonnes and 32 tonnes of manure will need to be collected and stored before eventual disposal at the end of each event.

Over a period of a year the amount of manure generated by the temporary stables alone would run into 100's of tonnes.

In addition, the applicant states that the horses will be bedded on wood shavings which will be saturated with horse urine – **see Para 2.7 of the applicants "Planning Design and Access Statement" November 2021 (V10).**

The stables will need to be cleared of bedding at least at the end of each event and this will be very considerable and weigh many 10's of tonnes in addition to the horse manure.

In view of the volume of waste material generated the WMP would normally need to be agreed with the Environment Agency and Anglia Water to ensure that no contamination/pollution of water courses/drainage ditches occurs which would be illegal.

We believe that due to the scale of the Waste Management operation, an Environment Permit may be required.

The temporary stables would also add significantly to the amount of animal waste already generated by the Keysoe International Equestrian Centre.

The government has provided some information on this matter although the scale of the stable development discussed in this application is substantially greater than that referred to:

<https://www.gov.uk/farm-and-livery-horses/dealing-with-waste>

## **2(c). – No Transport Plan has been provided with the application**

In the **"Planning Design and Access Statement"** (V10) the applicant states:

*"6.24 Transport advice has been prepared by Transport Planning Associates in consideration of these current proposals and which concludes that there is no link between the provision of the temporary stabling facilities and any increase in traffic movements. That advice is submitted in support of this application.*

*6.25 In light of their assessment of the current situation at KIEC and in consideration of the application proposals, TPA have confirmed that a Transport Assessment is not required."*

Earlier in their Planning Design & Access Statement the application states:

*"1.3 The planning statement should be read in conjunction with.....*

- *the Transport Advice Letter prepared by Transport Planning Associates"*

We are unable to find a copy of the “Transport Advice Letter” referred to in the “Planning Design and Access Statement” – it does not appear as an Appendix to the Statement, and a copy is not available with other documents held on the BBC planning website under this application number.

**In view of the scale of the proposals we strongly urge BBC to require the applicant to prepare a detailed Transport Plan to support the development which is very considerable in a rural area such as Keysoe and, as we have shown under Para 2a above, will certainly result in a very significant increase in visitors and traffic compared to current levels despite what the applicant claims.**

The applicant states in **Para 6.10 of the Design and Access Statement** that:

*“ ...From that research, it is evident that no constraints or conditions were imposed on any of the planning permissions granted for the commercial equestrian facilities at KIEC in relation to the extent of use or operating hours. This means that it is entirely within the scope of the permissions granted to operate multiple events, every day, on all of the facilities, throughout the year.”*

CPRE Bedfordshire believes that this statement is an inaccurate assessment of the situation.

In all cases where planning permissions are approved, they are granted by the local Planning Authority based on the information provided by the applicant in support of the application at that time. That might be opening hours, numbers of people expected to attend events, the scale of the proposed activities etc. etc. These details do not need to be accurately specified in the approval.

So, in our view each of the planning consents provided to date need to be taken in the context of the information provided by the applicant at that time.

So, if this application will result in a larger number of vehicles entering and leaving the site than was proposed and by implication agreed, for previous applications which had been approved, then the issue of Transport should indeed be re-evaluated and judged in line with **BBC’s Local Plan Policies 31 and 32.**

A Transport Plan is particularly important in this location due to very narrow principal access roads e.g.

- **Keysoe Road West** which is narrow and almost single-track in places with houses directly fronting the road and no footways.
- **Hatch Lane** is a single-track road across to Thurleigh
- **Church Lane** is the only appropriate access road to and from the site

These issues, in addition to the sheer volume of additional traffic that will be generated by the temporary stables need to be clearly recognised and specified in the application.

In addition, BBC's Climate Change policies require all new developments to look at reducing their "carbon footprints" and promoting greener forms of transport wherever possible e.g. public transport options –**BBC Local Plan 2030 Policy 87 refers.**

## **2(d) - Inadequate Noise Assessment and No Assessment of Light Pollution**

**The Noise Assessment** presented by the applicant has been based on the current situation at the KIEC and Para 7 of the report suggests that the noise expected from the 411 temporary stables will be limited to *"stable doors shutting and people talking"*.

It does not however assess the scale of the proposed development in terms of the numbers of people that might be expected at the stables.

We have shown (para 2a above) that at maximum capacity there could be anywhere between 200 and more than 800 people in this relatively confined area together with over 400 horses.

It is inconceivable to CPRE Bedfordshire that the noise will be limited to soft chatting and a few doors closing – in any group of this number of people there will be music playing, people shouting, horses neighing and making very wide a range of horse sounds.

Overall it will be more in line with a crowd attending a sports venue and therefore far more intrusive particularly in an area such as Keysoe which is normally very tranquil.

Whatever noise is create will travel a very long way and be very intrusive in an area which is normally very quiet.

### **Light Pollution**

No assessment has been made of the impact of artificial lighting around the temporary stables for which no details whatsoever have been provided.

This despite the location being entirely rural with very little or no street lighting.

**The NPPF July 2021 Para 185 states clearly** that planning authorities should take account of the following when making decisions on planning applications for development:

*"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; and*

*185 (c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation."*

**Keysoe and the surrounding area is one of the more tranquil parts of Bedfordshire and has some of the darkest skies at night.**

In conclusion, this entire planning application has continually underplayed the impact that the development of 411 temporary stables will have on the local rural community of Keysoe and on this rural part of Bedford Borough.

Nowhere in the application has the applicant stated clearly the number of people they expect will be using the temporary stables, the number of additional vehicle movements that will be generated by the development and the number of additional visitors and competitors it will encourage to attend the Keysoe International Equestrian Centre.

No detail has been provided regarding the artificial lighting of the temporary stables which will most certainly be required and the predicted noise levels have been significantly understated. Furthermore, the very important matter of Waste Management has not been adequately addressed and this could cause serious pollution problems.

CPRE Bedfordshire contends, that in the absence of this detailed supporting evidence it is not possible for the application to be properly considered by BBC.

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.*