



The countryside charity
Bedfordshire

CPRE Bedfordshire
43 Bromham Road
Bedford
MK40 2AA

Telephone: 01234 880624
Email: info@cprebeds.org.uk
www.cprebeds.org.uk
Registered Charity 1023435

David Gauntlett

Senior Planning Officer
Planning Delivery Places and Communities Directorate
Central Bedfordshire Council
Priory House
Monks Walk
Chicksands
Shefford
SG17 5TQ

10th December 2021

Dear Mr Gauntlett

CB/21/04809/REG3

Location: Land off Fordfield Road Steppingley

Proposal: Erection of a Crematorium and ancillary facilities

We have considered the documentation relating to this application which we understand is made on behalf of Central Bedfordshire Council (CBC) on land they own. It is very similar to the previous application, which we objected to in March 2019 and was we understand withdrawn on 1st April 2021.

CPRE Bedfordshire continues to **strongly object** to the above application for the following reasons:

1. The Proposed Development does not comply with CBC's recently Adopted Local Plan

The National Planning Policy Framework 2021 (NPPF) states that planning applications should be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The site is covered by Central Bedfordshire Local Plan (2021) which was only adopted on 23/7/2021. The Site is not allocated for development and there were no significant efforts to justify or secure an allocation.

CBC's Planning Officer in their letter of 6th March 2018 to the applicant stated that this site was

“excluded from the Local Plan process because of the potential coalescence between Ampthill and Flitwick. That decision is a material consideration in regard to any development proposal at this site.”

The applicant makes much of the pressing need for this facility. If this need is so obvious and urgent we fail to understand why CBC as Planning Authority did not seek to allocate land within the Local Plan for this purpose.

As the proposal is not in accordance with the very recently adopted Local Plan and was deliberately excluded from this we see no justification for the proposed development.

2. The Site is within the Green Belt and there are no very special circumstances to justify development

Not only is the site unallocated within the Local Plan it is located outside of a defined Settlement Envelope, set within open countryside, and falls within the Green Belt.

This type of development does not fall within the exceptions which are considered acceptable within the Green Belt as set out within s149 of the NPPF. As such it represents inappropriate development, which will be harmful to the Green Belt.

s147 and s148 of the NPPF state that

Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

We agree with CBC's planning officers who conclude in their pre- application advice dated 17th September 2021.

"Overall, the proposed development is anticipated to result in irreversible harm to the landscape character and setting"

One of the fundamental issues with this Green Belt site is deciding whether the benefits of this proposal outweighs the irreversible harm it will cause. However, the assessment of harm is completely inadequate in this case and cannot be used to base any decision to approve on.

It would appear that the Council's landscape consultant's comments on the previous application are no longer available on the planning portal. However the pre-application advice dated 6th March 2018 outlined their very strong concerns over

- i. The scale and form of the development which would result in a clear loss of openness and significant harm to openness. The degree of harm to openness is not considered to be reduced by the relationship to built form to the south.
- ii. The overall quantum and nature of the development which would very clearly see a change in the character and appearance of the land, setting and surroundings which would be a significant and harmful alteration to the open countryside character.
- iii. Whether the building is of sufficient quality and meets the requirement in the NPPF to have regard to local distinctiveness.
- iv. Whether landscaping across the site would reduce/soften the impact of built development including the treatment of the extensive parking areas to reduce their visual prominence.

Coupled with this is CBC's reasons for not pursuing an allocation in the Local Plan due to their concerns over coalescence with Ampthill and Flitwick.

Whilst obviously more work has been carried out by the applicant on these issues including the Landscape and Visual Assessment the Council's landscape consultant's assessments does not deal with any of these fundamental concerns. It focuses on the methodology used by the applicant and the on-site landscape proposals. The only wider reference is: -

The LVIA concludes that “moderate adverse effects on landscape and visual environment” will occur during construction and upon completion within the site and in close surroundings, although the proposals can be accommodated without permanent significant effect once the landscaping matures. Given the existing vegetation framework and the substantial tree proposals that surround the development, we are generally in agreement with this conclusion.

Where is their assessment of harm, loss of openness, coalescence impact on the wider Character area, loss of Green Belt etc?

The Case Officer was unable to confirm whether the landscape consultants had visited the Site which we find strange as presumably he is the one to instruct the consultants and prepare their Brief.

This assessment is therefore completely inadequate to judge whether the benefits outweigh the harm. As this is such a fundamental issue, we would have expected CBC, particularly as they are landowner as well as Planning Authority, to have commissioned a full independent assessment of harm rather than rely on a brief review of the applicant’s work.

3. The process of site selection is flawed and not robust.

We note that since our original objection the applicant has now carried out a retrospective site selection process to justify their proposals. Our concerns over this remain, in particular:-

- i. One of the key criteria to selection is land owned by CBC as these sites are considered to be available¹ and are free². This has unduly influenced the site selection process excluding third party land which may well be suitable. In addition, Local Authorities are obliged to secure best consideration for their Assets³ and the value/cost of this land should be included in any viability projections.
- ii. Green Belt land should have been precluded from consideration or at least some form of scoring system used which marked down Green Belt sites. The applicant has just treated their availability the same as any other land.
- iii. The entire selection process is driven by obtaining the best possible catchment to make the proposal as profitable as possible. Whilst we appreciate the facility needs to be viable, there does not appear to be any assessment of what the minimum catchment – over a time period is needed to achieve viability – this should be the starting point not the maximum possible catchment number.

We do not therefore consider there are grounds to approve this application and strongly object to the proposal.

Yours sincerely

Susan Lynch

Susan Lynch
CPRE Bedfordshire

¹ Para 9.5 Cheffins Needs Assessment 20/10/21

² Para 8.8 Cheffins Needs Assessment 20/10/21

³ S123 Local Government Act 1972