



The countryside charity  
Bedfordshire

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Registered Charity 1202399

24th January 2024

Working locally and nationally to protect and enhance a beautiful, thriving countryside for everyone to value and enjoy.

FAO: Thomas Mead, Senior Planning Officer

***Ref: CBC Planning Application, CB/24/03746/OUT: Land east of Hazelwood Lane, Ampthill, Bedford, MK45 2HA. Residential development of up to 19 self-build plots, 12 bungalows for the 55's and over, 70 residential dwellings (C3), including 30% affordable housing and 20 build to rent, a care home of up to 60 bedrooms, tree planting and landscaped spaces, including public open space and associated infrastructure. All matters reserved apart from access.***

Dear Thomas,

CPRE Bedfordshire wish to **STRONGLY OBJECT** to the application and offer the following for your consideration:

- CBC has an adopted Local Plan, and this site is not included for Housing Allocation.
- The site was assessed as ALP 356 and NLP 197 in the 'Call for Sites' for the current Adopted Local Plan and rejected at the early Stage 1b of the process on grounds that the site is not contiguous with the Ampthill settlement and lacks sustainable transport links to the town's amenities (SP1).
- As of October 2024, CBC can demonstrate a 5.05-year land supply to deliver the plan so windfall development is not required to deliver unmet need (SP7).
- The Inset Policy Map confirms that the site is outside the settlement envelope for Ampthill (SP7) and lies within the Greensand Ridge NIA (EE8) and Forest of Marston Vale (EE9). Across the B530 lies Ampthill Park (HE2) and on top of the ridge is Houghton House (HE1).
- Development of the site would have a significant impact on the Landscape Character and Value and therefore contrary to Policy EE5.
- The proposed housing mix appears to be an attempt to meet the criteria for exceptions to allow windfall development in the open countryside, rather than aligned to established housing need (H1).
- Approvals have already been granted for building a significant number of properties for older citizens on more suitable sites within the Ampthill settlement envelope (H3). Moreover, CBC can demonstrate that the demand for self-build plots can already be met with existing windfall approvals and Housing Allocation sites (H6).
- Ampthill Town Centre is reached from the site by a steep, narrow, winding, busy road (B530 – 40mph) with no footpath/pavement or street lighting. Virtually all journeys to/from the site will be by car which is not consistent with CBC's sustainable transport (T1) and Highway Safety (T2) policies.
- Medical facilities (GP, Dentist) lie south of the centre of Ampthill – a significant distance from the site – which makes the preponderance of housing for older citizen's even more inappropriate (H2).

In summary, CPRE Bedfordshire believes the location of the site is inappropriate for housing development (as was decided in the call for sites), lacks sustainable transport links to amenities in Ampthill Town centre and the proposed housing mix, with a significant number of dwellings for older people, is wrong for a site outside the settlement envelope and distant from medical facilities.

Any commercial benefit would be outweighed by the damage to the rural character and value of a site close to important natural (Greensand Ridge, Marston Forest) and historic (Ampthill Park, Houghton House) assets and is thus not consistent with NPPF 2024 requirements for sustainable development and the application should be denied.

CONTEXT

The Call for Sites and Adopted Local Plan Policies Inset Map show the site as covering sites ALP356 and NLP 197.



The sites were both rejected at Stage 1B in the Call for Sites Assessments with the following comments:

<p>ALP – 356</p> <p>Development of this site would not present a logical extension to Ampthill. The site lies some distance from the settlement edge. Any development on this site would not be well connected to the existing settlement of Ampthill and therefore would likely function in isolation.</p>	<p>NLP 197 –</p> <p>The site is not well related to Ampthill as it lies some distance from the settlement envelope and is separated from Ampthill by the A507</p>
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NPPF 2024 and ADOPTED LOCAL PLAN 2018 - 2035

This site has not been selected or included in the adopted Local Plan and, therefore, CPRE Bedfordshire consider that to grant such an application in open countryside, and outside of the settlement envelope, undermines the principal of having an adopted Local Plan in place.

The adopted Local Plan complies fully with NPPF2024 Chapter 2 Achieving Sustainable Development Para 8

- a) *an economic objective ensuring that sufficient land of the right type is available in the right places and at the right time to support growth.*
- b) *a Social Objective which requires a sufficient number of homes to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations, and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural wellbeing.*

The Local Plan having assessed Ampthill alongside all other towns and villages, has not identified this as an allocated site for development to meet Central Bedfordshire’s required growth in the Plan period, and it is apparent that this site would not conform with the NPPF Policy as stated above.

The development conflicts with the Development Strategy for the area and would by virtue of its location, design, and grain, result in harm to the character and appearance of the setting through the urbanisation of the countryside.

CBC are now developing a new plan which will define new updated housing needs and where they can be sustainably located. Therefore, CPRE Bedfordshire considers this proposal is premature and should be refused as the Council is currently assessing sites following the “Call for Sites” covering Brownfield land and Greenfield Sites which now has been completed.

To consider a proposal of this size and in open countryside undermines the principals and process of a plan led development strategy.

In CPRE Bedfordshire’s opinion the proposed site should follow the correct process and submit this proposed site for consideration for its inclusion within the new Local Plan process, as part of the Call for Sites on Greenfield Land.

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## ADOPTED LOCAL PLAN POLICIES

### ***Policy SP7: Windfall Development states:***

*“Settlement Envelopes provide a distinction between settlements and the countryside.*

*Within the Settlement Envelopes the Council will support housing, employment and other uses including new retail, service and community facilities proportionate to the scale of the settlement, taking account of its role and function in the settlement hierarchy...*

*Outside Settlement Envelopes, the Council will recognise the intrinsic character and beauty of the countryside and only particular types of development will be permitted. This includes the development of those sites allocated by this Development Plan, rural exception schemes, dwellings for the essential needs of rural workers and the re-use and replacement of existing buildings in accordance with Policies H5, DC1, DC2 or DC3...*

**The site is not allocated within the development plan, and the application is not for rural exception scheme or the needs of rural workers nor has it been previously developed.**

**CPRE Bedfordshire believes this is windfall development in open countryside and CBC should recognise the intrinsic character of the countryside, proximity to natural and heritage assets and reject the application.**

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### ***Policy EE5: Landscape Character and Value states:***

*“In order to safeguard intrinsic character, scenic beauty and perceptual qualities of the landscape such as tranquillity, all development proposals will need to have regard to the key characteristics and sensitivities of the site and its setting, as set out in the Central Bedfordshire Landscape Character Assessment.*

*All major development proposals will be required to demonstrate how they incorporate landscape enhancement, in accordance with the guidelines in the LCA, the Central Bedfordshire Design Guide and other relevant documents for specific areas. This includes the Chilterns AONB, **Forest of Marston Vale** and the **Greensand Ridge Nature Improvement Area**. Landscape and visual appraisal will be expected to support planning applications and include the assessment of local landscape character and views. All development will be required to respect, retain and enhance the character and distinctiveness of the local landscape by:*

*1. Reflecting the local character and distinctiveness in terms of the scale and pattern of the surrounding landscape and existing settlement form; and*

*2. Integrating on-site mitigation sympathetic to local character in scale with the landscape setting as well as the scale of the development.*

The site is undeveloped, agricultural land (BMV 3a) in a sensitive location within the bounds of both the Forest of Marston Vale (EE9) and the Greensand Ridge Nature Improvement Area (EE8). It lies on flat land at the foot of the Greensand Ridge and is adjacent to Ampthill Park and close to (and visible from) Houghton House.

It is contiguous with the Lockheed Martin (former Huntings) factory site. This is legacy from WW2 emergency measures and would be unlikely to be granted planning permission in this location under current Planning Guidelines. However, that site is now completely screened from adjacent countryside and important views by a tall 'hedge' of mature trees. There are no trees screening the proposed site for development in this application.

CPRE Bedfordshire's view is that any development of the site would detract from the intrinsic value of the site and this application should be denied.

***Policy T1: Mitigation of Transport Impacts on the Network states:***

*"It should be demonstrated how the proposal will seek to reduce the need to travel and secure a modal shift towards sustainable forms of transport. This should be through an approach which first considers the ability to cater for walking and cycling, provide suitable public transport services, and make better use of existing highway capacity before considering the provision of additional roads.*

*Evidence must be provided in Transport Assessments to demonstrate:*

- 1. The principles established to give priority to pedestrians and other vulnerable road users in new developments, together with links to local service provision<sup>21</sup>;*
- 2. Comprehensive, convenient and safe pedestrian and cycle links to schools, local employment and service provision;*
- 3. Connectivity with existing walking and cycling networks; and*
- 4. Robust consideration of the cumulative impacts of planned growth, including the cross-boundary impacts where appropriate"*

The site is separated from the amenities of Ampthill by a steep, busy, winding, narrow 40mph road (B530). There is no pavement or dedicated cycle path, and the road is unlit. Even 'fit' cyclists struggle to ascend the hill, and their slow pace impacts traffic flow.

Development of the site will not deliver a modal shift towards walking and cycling and that most journeys will result in an increase in the number of car journeys – adding to the existing congestion in Ampthill Town centre.

Moreover, with the planned preponderance of accommodation for older citizens (a vulnerable group) any professional Transport Assessment associated with planned development of the site will fail to deliver any of the stated objectives.

CPRE Bedfordshire believes development of the site is inconsistent with Policy T1 and should be rejected.

## SUMMARY

In line with NPPF 2024, CBC has an Adopted Local Plan (2018 – 2035) and, in the process of creating a new Local Plan, has issued calls for 'brownfield' and 'greenfield' sites.

In assessing the sites offered for the current adopted plan, CBC rejected sites ALP 356 and NLP 197 at Stage 1b as unsuitable for further consideration as sites for sustainable development on grounds of location and connectivity to amenities in Ampthill.

The location of the site is outside the settlement envelope for Ampthill with no likelihood of sustainable transport links to the retail, medical and education facilities of the town.

Given CBC's commitment to a 'Plan-Led' approach to development, it should reject this application for windfall development in the open countryside - consistent with its decision in the 'call for sites' assessment process and the Policies of the current Adopted Local Plan 2018 -2035.

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The site may well be offered as part of the current process for creating a new Local Plan and should be reconsidered as part of the process. However, since there have been no relevant changes in NPPF or the site's location or links to Ampthill amenities, CPRE Bedfordshire would urge CBC to be consistent with its previous decision and, again, reject the site for development in the new plan.

## CAVEAT

Finally, please note that in our submissions 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.

Dr Malcolm Hill

For & on behalf of CPRE Bedfordshire