



The countryside charity Bedfordshire

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Registered Charity 1023435

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

For The attention of Debbie Quinn, Principal Planning Office

Ref; CBC Planning Application – CB/21/02011/OUT, Greenwoods, Land North of Higham Road and East of the A6 Bedford Road, Barton Le Clay, Bedfordshire

CPRE Bedfordshire were shocked and alarmed at the submission of a planning application of a proposed development of such magnitude and impact with a consultation period of a mere 6 weeks. There has been no public engagement or consultation for what is in effect a new town which includes the realignment and duelling the A6 - a major highway in Central Bedfordshire. The proper place for such a proposal would be within the preparation and formation of the Local Plan.

In respect of the above CPRE Bedfordshire, make the following **objections** for your consideration in relation to this Planning Application, a significant proportion of which is within the Green Belt and setting of the AONB. It is noted that the application does not address the issues of non-compliance to policy, regarding inappropriate development within the Green Belt, which is, harmful to the Green Belt. It also fails to comply with the

requirements of Policy H5 of the South Bedfordshire Local Plan Review, which requires that the application is supported by the results of the Local Housing Needs Survey.

1. NPPF 13 Protecting Green Belt land.

Para 133. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent Urban sprawl by keeping land permanently open: the essential characteristics of Green Belts are their openness and their permanence.

The proposed development which extends into the Green Belt, is inappropriate development which would cause demonstrable harm to the openness of the countryside due to its excessive scale, unsatisfactory form and position. This application conflicts with para 134, 135 and 136.



The Local Plan is at an advanced stage having completed the Inspection hearings and Central Bedfordshire Council is anticipating an adopted Local Plan in place prior to Autumn 2021. Alterations to Green Belt Boundaries have been made through the Local Plan in accordance with para 136 of the NPPF 2019 and required to endure beyond the plan period (2035). NPPF 4 Decision Making – Determining applications Para 48 a) b) and c) applies. The Policies within the emerging Local Plan are consistent with those of the NPPF.b) and c) applies.

Nevertheless, material considerations have not been demonstrated that clearly outweigh the harm caused to the Green Belt and AONB. Consequently 'very special circumstances' do

not exist, and the development is contrary to the aims and objectives of Section 13 of the National Planning Policy Framework.

The proposed development, by virtue of its excessive scale, unsatisfactory form and position would be visually intrusive and harmful to the character of the site and character of the countryside. The proposal is contrary to Policy BE8 of the South Bedfordshire Local Plan Review, in that it would adversely affect landscape character and setting, and Section 12- Achieving well designed places and 15- Conserving and enhancing the natural environment, of the National Planning Policy Framework.

2. Harm to Character & Appearance of the Landscape

The proposed development sits outside of all 5 of the individual adjacent village envelopes in open countryside, and therefore is contrary to several current CBC Policies and SP7 of the emerging Local Plan.

The proposed development is unsustainable and would be contrary to the adopted Core Strategy and Development Management Policies (2009), which will apply until an adopted Local Plan is in place.

Policy DM4: Development within and beyond settlement envelopes - The proposed site sits outside of all the 'Villages Envelopes' and would not be allocated for 'Market Housing', as under policy DM4 – only Exception sites would be considered. Policy CS8 Exception Schemes refers.

Equivalent emerging Local Plan Policy SP7: Development within Settlement Envelopes

Policy DM14: Landscape and Woodland *Equivalent emerging Local Plan Policies DPS11 Landscaping for New Developments & DPS16 Trees and Hedgerows.* At the beginning of 2016 CBC published the Central Bedfordshire Landscape Character Assessment. **LCA 8D and 5B** applies.

Policy DM16: Green Infrastructure - DM16 seeks to ensure that development that adversely affects green infrastructure assets will not be permitted. Such assets include natural green spaces. CPRE believes this site is not sustainable on environmental grounds as outlined above and states the Government's core planning principals including: Taking account of the different character of different areas, together with recognising the intrinsic character and beauty of the countryside.

Equivalent emerging Local Plan Policy EE1 : Green Infrastructure.....

Policy CS16 Landscape and Woodland Preserve and enhance the varied countryside character and local distinctiveness in accordance with the findings of the Mid Bedfordshire Landscape Character Assessment.

CBC Development Strategy Policy 56 had expanded and updated those policies requiring landscapes to be conserved and enhanced*the landscapes will be conserved and enhanced in accordance with the Landscape Character Assessment. Proposals that have an unacceptable impact on the landscape quality of an area will normally be refused.*

It is also considered to conflict with the stated objectives of the NPPF and National Planning Policy Guidance (February 2019), in relation to consideration of modes of sustainable transport.

The 2019 Planning Application for 103 homes in nearby Meppershall CB/ 19/0239/OUT was subject to an **Appeal Ref; APP/P0240/W/20/3249265** Land to the rear of 40 Shefford Road, Meppershall, Shefford SG17 5LN and was **DISMISSED** on the following grounds:-

Inspector's summary para's refer,

- 27. I have had regard to the other Inspectors' findings in the previous appeal decisions on other sites in Central Bedfordshire, cited by the parties. A substantial proportion of these decisions conclude that Policy DM4 of the CSDMP should be apportioned moderate weight. On the evidence before me and for the reasons described above, I agree with that finding.*
- 28. The other most important policies in this case are CS14, CS16, DM3 and DM14 of the CSDMP. Given my findings in relation to character and appearance I attach considerable weight to the proposal's conflict with the above combination of development plan policies.*
- 29. Given the totality of harm identified above, I conclude that the adverse impacts of the proposed development would significantly and demonstrably outweigh the benefit, when assessed against the policies in the Framework taken as a whole.*

CPRE Bedfordshire consider that the decision also applies to this application, particularly in respect of the referenced over-intensive urbanising development and effect on the open countryside.

3. Local Plan

At para 14 of the DCLG Procedural Practice in the Examination of Local Plans it states - It must be remembered that the examination process starts on submission of the plan. The CBC Pre-submission Local Plan was submitted for Inspection on 30th April 2018 and did not include this site which,

Failed at Stage 2 based on an overall consideration using planning balance. The following issues have been identified: Development within this site would cause substantial harm to the designated heritage assets which on balance would not be outweighed by the benefits of a development in excess of 1500 homes either through developing the site as a whole or in part, to form a self-contained settlement. It is considered that development to the west of the A6 would be disconnected from the settlement and would not be of a scale to standalone. It is considered that the site is not worthy of further assessment.

As stated above the Local plan is at an advanced stage with adoption expected in the summer of 2021. Allocations approved outside of the Local Plan at this stage would undermine the process of site assessment and the Local Plan itself.

Central Bedfordshire has already seen extensive development granted for sites outside of settlement envelopes and not included in the Local Plan, resulting in a projected level of growth beyond that proposed within it. This accumulative growth is already undermining the plan-making process by predetermining decisions about the scale, location and phasing of new development.

As an illustration; following a Freedom of Information request by CPRE Bedfordshire, we have determined that CBC have, between January 2018 to Mid-September 2020, already granted permission for 3,941 windfall homes the local villages adjacent to this site have supplied **212** to this ever increasing pool.

Given the position of the Local Plan, consideration of such development would be considered premature, should such an application be approved at this time. Para 14 PPG and 49 of the NPPF 2018 – reasons for refusing an application on the ground of prematurity include: -

a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by *predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.*

3. 5 Year Land Supply

As of 1st January 2021, CBC can demonstrate a 5.94 years supply of deliverable housing sites and this position and that of the Policies currently relied upon by CBC are supported by 7 Appeal decisions since the beginning of 2020.

These include two Local Planning Inquiries in nearby villages - Appeal Ref: APP/P0240/W/19/3236423 Land west of Langford Road, Langford Road, Langford, SG18 9QU, and Appeal Ref: APP/P0240/W/16/3164961 Land to the west of Langford Road, Henlow, Bedfordshire SG16 6AF and in each case the tilted planning balance was not engaged following forensic examination of the 5 year land supply and the Inspectors' endorsement of the use of the SHMA produced for the Local Plan, to correctly assess housing need to 2035. The proposed sites were found to constitute unsustainable development; therefore, the Appeals were dismissed.

CBC has a proven record of delivering homes to targets, the Housing trajectory January 2021 detailed almost 2,500 over delivery to date.

Therefore, these homes are not required to meet CBC's forward 5 year Land Supply.

4. BMV Agricultural Land

It is concerning to note that the land is BMV land Grade 2 & 3, which is offered protection within NPPF 2019 - 15. Conserving and Enhancing the natural environment -

172 b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

Footnote 53 Where significant development of agricultural land is demonstrated to be necessary; areas of poorer quality land should be preferred to those of a higher quality.

Central Bedfordshire is suffering a cumulative loss of BMV land as protection is not given priority and little attention is given to the intention of the NPPF in this respect. Until and unless this accumulative loss is considered – rather than referring to the relative size of the individual site – this trend will continue to undermine the intention of the NPPF to protect it - resulting in unsustainable development within Central Bedfordshire.

The CBC Sustainability Appraisal for the Local Plan includes the following Key Issue *The retention and protection of best and most versatile agricultural land, which is a national issue.*

Development of this BMV Grade 2/3 site is clearly not necessary or sustainable.

5. CPRE Bedfordshire believes this site is not sustainable on grounds of transport Policy TP1A

This policy requires developers to show how developments will reduce the need to travel and reduce reliance on cars; this proposal fails on both counts. and should be refused accordingly. As is already the case, residents of the new development would be commuting to workplaces in Luton, Milton Keynes and Bedford or railway stations by car. Car usage would be necessary to access facilities in the wider area as there will be limited entertainment and retail outlets within this proposed development.

CPRE Bedfordshire dispute the traffic predictions in the developers Transport Report which were calculated during the Governments COVID second Lockdown period and have not taken into account the impact of the new proposed M1- A6 Link Road which has planning consent. This new link road is intended to direct heavy freight traffic onto the A6 from the M1 and the planned Rail Freight Interchange (RFI) located at J11a.

The proposed concept of 'dualification' of a very short section of the A6 is flawed as traffic will back up with vehicles exiting the proposed development joining the traffic to the North towards the A507 Clophill roundabout. The effect will generate " rat runs" in nearby villages.

In addition, the cumulative effects of other developments being built out, consented or allocated in the Emerging Local Plan in neighbouring communities have not been considered in the developers Transport Report.

6. Loss of Habitat

NPPF 15 Conserving and Enhancing the natural environment

Para 170 a refers to protecting and enhancing valued landscapes, sites of biodiversity or geological value and soil. Section b refers to the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

CPRE Bedfordshire are very concerned with the loss of wildlife habitat should this development come forward. The area is a rich setting for birds, which include nesting Red Kites, Buzzards, Skylarks, Yellow Hammers, Grey Wagtail, Kingfishers, Swallows, Green Woodpeckers and greater spotted woodpeckers. Several of these species are on the Red and Orange Lists of protected species. There is also substantial evidence that Badgers frequent the open countryside in the area.

7. Solar Array

The proposed location of the Solar Array is contrary to the CBC Guidelines dated 2014 whereby areas of low sensitivity are identified. This proposal is located in a high sensitivity area adjacent to Historic Wrest Park.

8. Archaeological & Heritage Assets

NPPF 16 Conserving and enhancing the historic environment Proposals affecting heritage assets 189

Considering potential impacts - Para 194 Any harm to, or loss of the significance of a designated heritage asset (..... or from development within its. Setting), should require. Clear and convincing justification.

CPRE Bedfordshire consider the scale of the proposed site will have a negative and irreversible impact on both the Heritage and Archaeological Assets in the locality.

The extensive level of development as proposed would result in an undisputed degree of change to the open countryside, which in turn will result in serious harm to Central Bedfordshire's heritage assets and their settings namely - Wrest Park, Church of All Saints (Grade I), Parish Church of Saint Margaret (Grade II), Fielden Farmhouse (Grade II) and Little Ion.

Therefore, CPRE Bedfordshire have very strong views with regard to the principle of development on this site.

9. Drainage & Flood Risk

The Northern region of the proposed development lies in Flood Zone 2. This area has experienced extreme flooding in the past. During the winter of 2020, there was significant flooding in Shillington and Gravenhurst with many roads closed. The woods in the Wrest Park Conservation Area were flooded for a long period and the water table in the area remains high.



Towards Shillington from
Gravenhurst

Photo taken Jan/Feb 2021

The developers acknowledge the flood issue in their Agricultural Land Classification report by down grading the land from Grade 2 to 3b in the Northern region of the site due to flooding (*page 5, report dated 19/8/2020*).

The Desktop study has not taken into account the changing pattern of weather.

In today's more separate, polarising environment, open green spaces are the hearts of communities and have been the lifeline of many people during lockdown. These spaces are more than just open fields, they create stability, a piece of infrastructure for people's mental and physical wellbeing. CPRE believes losing these spaces would be a tragic loss, not just for the local people and visitors, but for the abundance of wildlife which inhabit the area.

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.

John D English

For & on behalf of CPRE Bedfordshire

NB; References used in our Representation;-

- A. Natural England Technical Information Note TIN049, Agricultural Land Classification:
Protecting the best and most versatile agriculture land.
- B. Government 25 year Plan BMV.