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11th November 2015

Dear Sir/ Madam

REF: CBC/15/03927 Land off Flitton Road Greenfield - OBJECTIONS

The withdrawal of the Central Bedfordshire Councils Development Strategy has left many green field sites vulnerable to opportunistic applications brought forward under the National Planning Policy Framework's 'presumption in favour of sustainable development'. However, we believe the Council has a duty to protect those areas it considers unsuitable for development, for policy reasons that are likely to feature within its new Local Plan. The lack of an approved Community Infrastructure Levy scheme will also result in a further detriment for those communities affected by granting planning permission to this application.

Flitton and Greenfield are in the early stages of developing their Neighbourhood Plan. However, it is already clear that this will be based upon a wish to retain their designation as a Small Village and to avoid amalgamation of their villages. The villages are tightly constrained by the village envelope boundary and the existing separation provided by areas of open countryside between the villages and developed areas are valued by the residents.

The proposed site is outside of the development envelope and in open countryside and in an area where there are only individual houses along the road joining the villages – this would, therefore, be out of character with the existing village and over development of the area concerned. The Development Strategy allowed a maximum total of 15 houses being added to a Small Village as windfall within the village envelope or on exception sites.

National Planning Policy Framework Paragraph 49 – Presumption in favour of sustainable development is being heavily relied upon as a reason for granting planning permission but this is only valid for 'sustainable' development and we do not believe this site meets applicable 'sustainable development' criteria.

The council published its Draft Central Bedfordshire Landscape Character Assessment in January 2015. Section 7A refers to the Flit Greensand Valley which includes the protected Site of Special Scientific Interest of Flitwick Moor and incorporates the villages of Flitton and Greenfield. Reference is made to the physical and natural landscapes 7A.2 and 7A.5 when considering the suitability of developing this area as well as Landscape Management Guidelines 7A.1.37 regarding Flitwick Moor and 7A.1.38.

Additionally the 'Flitwick Green Wheel' and plans to enhance the Flit Valley seek to expand the area of Flitwick Moor and extend and improve the areas surrounding it to conserve the Flit Greensand Valley. These plans are jeopardized if housing development is permitted in this area.

The Planning Statement provided is out of date and inadequate. There is no market led demand for housing in this area as both Flitwick and Ampthill continue to provide new housing with better and more sustainable access to facilities and transport. The site in question is not bounded by housing estates and there is only ribbon development along the roads on two of the boundaries. This would constitute a development out of character with the existing housing and over development.

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We advocate positive solutions for the long term future of the countryside.

The rear of the site backs on to a pond. Residents report flooding/pooling of water and there is inadequate consideration of the effects of the reliance on soakaway drainage in the light of the provision of 'block paved' driveways. This lack of attention to the constraints of the site is of concern, as is the reference to the parking requirements of Northampton as opposed to Central Bedfordshire Council.

There is a lack of public transport – buses are infrequent and unsuited to work related travel. Although the Town of Flitwick is nearby there is no safe route to walk or cycle and the distance of 3Km would preclude many people walking to Flitwick to take advantage of its amenities. There would be over reliance on cars and Flitwick is already congested and lacking in parking facilities. As is already the case, it is likely that residents of the new development would be commuting to work by car, and using cars to access all facilities that are absent in the villages such as GP, shops etc. The school is oversubscribed and constraints on site mean it cannot expand further. These issues make this site unsustainable for social and environmental reasons.

There would be no economic benefit to the villages or surrounding area as the developers of this site will not be contributing to the community in any way. With no Community Infrastructure Levy in place there will be no contribution being paid directly to the parish to mitigate the effects of the development. This makes this site 'unsustainable' in terms of economic benefit.

Flitwick and Ampthill continue to grow and housing is actively being supplied on a regular basis. There is, therefore, no pressure to build on the unsuitable and unsustainable greenfield sites of Flitton and Greenfield. The real detriments of developing in Flitton and Greenfield clearly outweigh any claimed benefits.

CPRE will also be responding to application Ref CBC/15/03958/OUT Land off Greenfield Road Flitton. We believe they should be considered together in respect of the impact that would result should both applications be separately approved.

Yours sincerely

Mary Walsh

CPRE Bedfordshire Area Planning Representative