

Ms. Vicki Davies,
Development Management,
Central Bedfordshire Council,
Priory House, Monks Walk,
Chicksands,
SHEFFORD, SG17 5TQ

6th January 2015

Dear Ms. Davies,

Application CB/14/04055/OUT – Land off Totternhoe Road, Eaton Bray

CPRE wishes to register objection to the above application.

As the applicant acknowledges, this proposal represents inappropriate development by virtue of the harm it would cause to the openness of the Green Belt. Nevertheless, he seeks to justify this by asserting ‘very special circumstances’ sufficient to outweigh this harm.

We do not agree that the arguments he puts forward amount to such a case of very special circumstances. In particular, we refer to his ‘VSC 1’ (Housing Land Supply) and VSC 2 (Lack of alternative sites in Large Villages), at Paras. 4.8 and 4.10 respectively of his Planning Statement.

At Para. 4.8 (VSC 1) he states ‘*It is considered that the application represents a suitable potential ‘emerging’ site which can help address the delivery of the 1500 homes required over and above the existing identified deliverable sites*’. We assume this to be a reference to Policy 29 of the Submission Development Strategy, although the figures indicated there are 1000 additional homes through the Market-led Sustainable Development Policy (Policy 29a) and a further 2000 homes through the Site Allocations Plan and Neighbourhood Plans.

We see nothing in Policies 29 or 29a, or in the text preceding them, to indicate that the delivery of these numbers might be facilitated by means of Green Belt releases additional to those already provided for in the Submission DS. In fact, Para. 10.8 of the Submission DS specifically states, in relation to Policy 29a (*Market-led Sustainable Development*), that ‘*The policy provides for a limited amount of growth outside certain settlements beyond the Green Belt to come forward without the normal allocation process*’.

As for the Site Allocations Plan itself, even if this were to propose some limited further alteration of GB boundaries, such a possibility cannot at this stage be pre-judged, so that in this context the applicant’s proposals can only be viewed as premature. We would

comment that the more appropriate course at this stage is for the applicant to put forward this site in response to the Council's current 'Call for Sites' initiative.

At Para. 4.10 (VSC2 – Lack of alternative sites within 'Large Villages'), the applicant appears to be referring to the provision in the Submission DS under Policy 5 (*Neighbourhood Planning*), whereby Neighbourhood Plans may potentially bring sites forward for development beyond the Green Belt boundary where there is no suitable alternatives within the existing settlement. We note, in fact, that the applicant specifically quotes Para. 5.23 of the Submission DS on this subject at Para. 3.8 of his Planning Statement.

As to this argument, we would simply point out that such a possibility is one for the community itself to put forward, not developers.

Finally, we refer to the Travel Plan and Transport Statement documents prepared on behalf of the applicant. The work that has been done on these appears only to be at a very preliminary and cursory level, underpinned by some highly questionable assumptions. We cannot agree, therefore, that this work supports the assertion the applicant makes in his Planning Statement at the conclusion of Para. 5.1. that '*It is considered the proposal will not have any adverse effect on the highway in respect of both road safety and traffic generation*'.

For a proposal involving 150 homes on the edge of a village which has already seen very considerable expansion in recent years, is already heavily trafficked at certain times of day, and is only served via a network of 'C' classification roads, this assertion can have no credibility.

For all the above reasons, we urge that the Council refuses this application.

Yours sincerely,

(signed)

T.H. Adburgham
Area Representative, CPRE Beds.