

Mr Jim Caffrey  
Planning Officer  
Planning, 4<sup>th</sup> Floor  
Bedford Borough Council  
Borough Hall  
Cauldwell Street  
Bedford MK42 9AP

6<sup>th</sup> December 2013

Dear Jim Caffrey,

**Re Applications 11/02686/EIA and 11/02685/EIA and associated planning applications  
Eastern Land Parcel and South Eastern Land Parcel - Land to the rear of Cardington Sheds Shortstown MK42**

We refer to your letter dated 15<sup>th</sup> November 2013 regarding the above applications.

CPRE Bedfordshire objects strongly to the applications for the following reasons:

**1. Historic setting of the Cardington Sheds 1&2**

The Cardington Sheds are Grade 2\* listed and as such are recognised as being of both national and international significance. They are assets of great historical importance to our country.

Due to their enormous size, they are incredibly important landmarks in the area and are a very important feature of Bedford's industrial heritage.

These buildings are iconic when it comes to the recognition of Bedford by the rest of the UK and elsewhere and should be treated with great care.

CPRE Bedfordshire objects to both the extension of the Eastern Land Parcel and to the development proposed for the South Eastern Land Parcel

A substantial part of the imposing grandeur of both sheds is their location in open green space that relates to their original use and also creates a relevant impression of size. This would be lost if the north eastern ends of both sheds are impacted by these proposed developments.

**NPPF para 132 states: “.....Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”**

**This is most certainly the case with this proposal - the setting of the Grade 2\* listed sheds 1 and 2 will be very much damaged by the proposed housing.**

*25 years of standing up for Bedfordshire's countryside 1987-2012*

CPRE Bedfordshire is the Bedfordshire Branch of the Campaign to Protect Rural England which exists to promote the beauty, tranquillity and diversity of rural England.  
We advocate positive solutions for the long term future of the countryside.

**2. Substantial parts of the proposed development (a 3 hectare (?) extension to the Eastern Land Parcel and the whole of the South Eastern Land Parcel) will take place on land currently identified in the Borough's Allocation & Designations Plan as being in "open countryside" and outside of land identified for housing development.**

**Borough Policies CP14** requires that development will only be allowed in these areas in exceptional circumstances and consistent with National Policy.

The applicant has not identified any circumstances that might be considered as exceptional or that conform to National Policy.

**The application is therefore at odds with current Borough Core Strategy and the recently adopted Allocations and Designations Plan.**

### **3. Viability Assessment - Enabling development - Shed No 1**

- **Viability of enabling development - issue of confidentiality**

The applicant has tried in a previous application, to use the issue of project viability to deprive the Borough Council of S106 obligations (affordable housing etc) and also to use it to show that their project was unviable without the release of further land (currently identified as "open countryside") for development - both in order to fund repairs to Shed No 1.

In this previous application the applicant's viability assessment was available for all to read.

CPRE Bedfordshire's letter dated 28<sup>th</sup> August 2012 regarding the previous applications identified several areas for serious concern in the applicant's viability assessment - these concerns were later justified by a report commissioned by the Council into the viability assessment.

**It now appears, rather fortuitously for the applicant that the Borough Council has discovered reasons why the viability assessment associated with the new application can no longer be made available to the public.**

The Council has undertaken its own assessment of the applicant's current project viability but neither this nor a Summary Report has been made available with the application.

All that can be seen is a letter from the Council's independent assessor simply stating that the report is confidential to the Council.

**It is regrettable that the Council finds it necessary to limit information to the general public that is vital to the determination of this application.**

- **NPPF - Issue of viability**

If the applicant is relying on the issue of viability alone (and this is unclear in the application since we are unable to see the applicants viability/enabling arguments - the report being deemed "confidential") as laid down by the coalition government in the NPPF then we do not believe that this is a correct use of the issue.

When introducing the issue of viability the government was, in our view, relating it to a discrete project, allowing the applicant the argument that large/unjustifiable planning obligations could make a project/development unviable and that therefore the LA should reduce the planning obligations.

**In this instance the applicant is not only saying that the obligations are too high, they also want an additional substantial chunk of land as well. This is an**

unsustainable argument. If it were what the government intended then developers would be demanding additional land across the country on the basis of non-viability, to our knowledge they are not!

- **Ownership of shed No 1**

The Council should be aware that:

a). Shed No1 is in private ownership and the asset has increased substantially in value in recent years. Full repairs to the roof will further increase its value

b). The applicant purchased the various land parcels in the full knowledge of their potential value and of the risks involved. It is not for the public purse to underwrite all risk.

**Gerry Sansom**  
**For CPRE Bedfordshire**