Central
Bedfordshire
Council
Priory House
Monks Walk
Chicksands,
Shefford SG17 5TQ

TO EACH MEMBER OF THE
DEVELOPMENT MANAGEMENT COMMITTEE

21 July 2015

Dear Councillor

DEVELOPMENT MANAGEMENT COMMITTEE - Wednesday 22 July 2015

Further to the Agenda and papers for the above meeting, previously circulated, please find attached the Late Sheet:-

Late Sheet **3 - 28**

Should you have any queries regarding the above please contact Democratic Services on Tel: 0300 300 4040.

Yours sincerely

Helen Bell,
Committee Services Officer
email: helen.bell@centralbedfordshire.gov.uk

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LATE SHEET

DEVELOPMENT MANAGEMENT COMMITTEE – 22 JULY 2015

Item 6 (Page 15-158) – CB/15/00297/OUT – Land West of Bidwell (Houghton Regis North Site 2) Houghton Regis.

Additional Consultation/Publicity Responses

1. Applicants' additional information 03/07/2015

Road Safety Audit Stage 1 and designers response.

2. Public Protection 07/07/2015

The opportunity remains for the applicant to resolve technical matters through further detailed design and assessment. Recommends conditions in respect of the following.

a) Noise mitigation measures for residential properties.
[OFFICER NOTE: Refer to recommended Condition 19]
b) Hours of operation and lighting schemes in respect of commercial uses.
[OFFICER NOTE: Such matters are to be controlled through subsequent detailed planning proposals when the specific nature of commercial uses is known and under other legislation where appropriate]
c) No residential development within odour sensitive areas.
[OFFICER NOTE: Built layout is to be controlled by the Development Parameter Plans and Masterplan. Approval of these documents will prevent residential development within odour sensitive areas]
d) Construction Environmental Management Plan.
[OFFICER NOTE: Refer to recommended Conditions 11 and 20]

3. Historic England 09/07/2015

- The amended application is supported by an addendum to Chapter 8 of the ES, which addresses the concerns raised by Historic England and the Development Management Archaeologists at Central Bedfordshire Council.
- It is noted that additional information has been provided on the impact upon the scheduled monument and the addendum includes a more detailed look at what elements of the monument's setting contributes to its setting.
- It is agreed that the site's location on the valley floor is an important consideration and that the surrounding 'medieval' landscape has been altered and eroded by the modern field pattern and modern development.
- The key issues upon which Historic England disagrees is the relative importance to the monument's significance from the current sense of 'privacy, enclosure and seclusion, the age and extent of the woodland associated with it and, more notably, the relative importance to the monument's significance from its placement within an open, agricultural and relatively undeveloped landscape.
- It is recommended that options are explored to enhance the mitigation proposed in the application. *[OFFICER NOTE: The detailed elements of the proposed mitigation would be a matter for subsequent detailed planning submissions.]*

4. Barton Willmore on behalf of Houghton Regis Development Consortium for HRN1 10/07/2015
Objection. Detailed concerns are raised with regards to highways matters (walking, cycling and public transport strategies, traffic impacts) and the design documents supporting the application including information provided within the Bidwell West Design Code, June 2015.

5. CBC Tree and Landscape Officer 10/07/2015
No further comment on the June 2015 amendments.

6. CBC Highways Development Management 15/07/2015
At the request of this office, the applicant has commissioned a Stage 1 Road Safety Audit. The Stage 1 RSA has identified a number of minor issues. In totality, the issues have been accepted by the applicant's technical team and appropriate measures have been recommended. The appropriate remedial measures and re-designs will be incorporated into any future Section 278 works that may arise from any planning permission granted. This is supported.

7. Applicants' additional information 16/07/2015
It is requested that Condition 7 be amended to require a scheme for surface water disposal in accordance with the submitted drainage strategy. An updated Drainage Strategy Report (Addendum) and executive summary are submitted providing the following.

a. Calculations for attenuation ponds Nos. 1 and 6
b. An additional drawing to clarify the exceedance flow routes
c. An additional table to clarify the discharge flow rates from the ponds and how these related to the development areas

8. Optimis Consulting on behalf of landowners with the Bidwell area, east of the application site 16/07/2015
Holding comments of 02/07/2015 removed.

9. Barker Parry Town Planning on behalf of residents of Bidwell Farm Barns and Bidwell Farmhouse 17/02/2015
Reiterates comments of letter dated 02/07/2015 as summarised within the Committee report.

10. 161 Cemetery Road, Houghton Regis 20/07/2015
Objections to the wildlife wardens building previously proposed appear to have been readily accepted without exploring mitigation or other options, or input from those supportive of the warden building.

11. Buckingham and River Ouzel Internal Drainage Board 20/07/2015
No further comments.

Additional Comments
1. Paragraph 2.4 (page 99) of the Committee report includes a typographical error. The final sentence of this paragraph should read as follows.
In the context of the current scheme, and given the nature of the proposed 'town centre uses', the application of a sequential test would not be appropriate as the

provision of these uses elsewhere would not ensure a sustainable form of development.

2. Paragraph 10.2 (page 141-142) of the Committee report sets out Officers' current expectations in respect of transfer arrangements for various land parcels. For the avoidance of doubt, this is a general expectation and the final transfer arrangements in respect of any land within the site would be established through the formation of a Section 106 Legal Agreement to be agreed with the applicant.

Additional/Amended Conditions
The following recommended conditions are amended to incorporate minor wording changes as summarised/explained as part of the applicants' additional information dated 16/07/2015.

7 **Development shall not begin until a scheme for surface water disposal in accordance with the principles of plan No.13893 - SKC101 Revision C has been submitted to and approved in writing by the Local Planning Authority. Infiltration systems shall only be used where it can be demonstrated that they will not pose a risk to groundwater quality. The development shall be carried out in accordance with the approval details.**

Reason: To protect and prevent the pollution of controlled waters from potential pollutants associated with current and previous land uses in line with the NPPF. Details must be approved prior to the commencement of development to prevent any potential pollution of controlled waters which could occur in connection with development.

24 The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted documents;

- Parameter Plan 1: Land Use, Open Space & Landscape (1362/PL02 Rev G);
- Parameter Plan 2(a): Vehicular Movement & Access (1362/PL06);
- Parameter Plan 2(b): Pedestrian & Cycle Movement & Access (1362/PL07);
- Parameter Plan 3: Buildings Height (1362/PL04 Rev E);
- Parameter Plan 4: Residential Density (1362/PL05 Rev E);
- Site-Wide Masterplan (1362-PL09);
- Estate Road 1 Sheet 1 BE1362-3T-01 (Second Issue);
- Estate Road 1 Sheet 2 BE1362-3T-02 (Second Issue);
- Estate Road 1 & 3 Sheet 3 BE1362-3T-03 (Second Issue);
- Estate Road 2 Sheet 1 BE1362-3T-04 (Second Issue);
- Estate Road 2 Sheet 2 BE1362-3T-05 (Second Issue);
- Thorn Road Narrowing BE1362-3T-06 (Second Issue);
- Thorn Road Estate Road BE1362-3T-07 (Second Issue);
- Thorn Road Western Area of Site BE1362-3T-08 (Second Issue);
- Bedford Road Sheet 1 BE1362-3T-09 (First Issue);
- Overview Plan BE1362-3T-10 (First Issue);
- Bedford Road Sheet 2 BE1362-3T-11 (Second Issue);
- Plan and Profile Estate Road 1 Sheet 1 BE1362-3T-12 (Second

Issue);
- Plan and Profile Sheet 2 BE1362-3T-13 (Second Issue);
- Plan and Profile Estate Road 1 Sheet 3 BE1362-3T-14 (Second Issue);
- Plan and Profile Estate Road 2 Sheet 1 BE1362-3T-15 (Second Issue);
- Plan and Profile Estate Road 2 Sheet 2 BE1362-3T-16 (Second Issue);
- Drainage Strategy Report (R/C13893/001.02, July 2015);
- Adoptability Plan (13893-SKC005 Rev)
- Drainage Management Plan Sheet 1 (13893-SKC010 Rev C)
- Drainage Management Plan Sheet 2 (13893-SKC011 Rev C)
- Drainage Management Plan Sheet 3 (13893-SKC012 Rev B)
- Drainage Management Plan Sheet 4 (13893-SKC013 Rev B)
- Drainage Management Plan Sheet 5 (13893-SKC014 Rev B)
- Drainage Management Plan Sheet 6 (13893-SKC015 Rev A)
- Flood Exceedance Route (13893-SKC102)Drainage Construction Details (13893-SKC004 Rev A);
- Pond Detail Sections (13893-SKC100 Rev A);
- Drainage Strategy Report (Addendum) (R/C13893/002.03, July 2015);
- Drainage Management Plan (13893-SKC101 C);
- Revised Landscape Framework Plan (5331/LM/ASP07 REV G);
- Revised Open Space & Development Parcel Phasing Plan (5331/OSP/ASP09 Rev C)
- Outline Waste Audit (June 2015);
- Bidwell West Design Code (June 2015);
- Outline Public Art Plan (5331.PAP.006, June 2015);
- Tree Constraints Plan (8788 TCP 01 Sheets 1 to 5); and
- Tree Protection Plan (8788 TPP 01 Sheets 1 to 5).

Reason: For the avoidance of doubt.

Item 7 (Page 159-240) – CB/15/01928/OUT – Up to 44,700m² of B1, B2 and/or B8 employment development floorspace with associated infrastructure and ancillary works. All matters reserved except means of access.

Additional Consultation/Publicity Responses

1. Bank End Cottage, Chalk Hill, Dunstable 15/07/2015

Object to loss of habitats for industrial development.

2. CBC Highways Development Management 15/07/2015

The applicant has now undertaken a Transport Policy review, to which the proposal accords well and is supported.

At the request of this office, the applicant has undertaken a suite of swept path analysis drawings demonstrating the suitability of the site access proposals with regards to a max legal 16.5m articulated vehicle. This is acceptable.

This office is still awaiting the requested Stage 1 Road Safety Audit.

3. Bank End Cottage, Chalk Hill, Dunstable 18/07/2015
Raises concern and objection regarding noise and light impacts with reference to noise pollution policy and hours of operation.

4. Applicants' additional information 20/07/2015
Road Safety Audit Stage 1 submitted.

5. Houghton Regis Town Council 21/07/2015
OBJECT to the application in principle on the following grounds:

- the site is in the Green Belt;
- the Development Strategy has stalled – CBC's "exceptional circumstances" case for Green Belt change has yet to be tested at Examination and found to be sound and;
- CBC's reliance on a draft Joint Development Strategy withdrawn in 2011 to demonstrate the existence of "exceptional circumstances" is inadequate and flawed;
- the Examination Inspector has concluded that CBC failed to discharge its duty to co-operate;
- as a result of the above the testing of the soundness of the DS is therefore a long way off and it should not be relied upon as the basis for decision making on major development proposals in the Green Belt;
- CBC's resolution to "endorse the DS for the purposes of Development Management is not an adequate basis for decision making on major development proposals in the Green Belt.

Additional Comments
None.

Additional/Amended Conditions
None.

Item 8 (Pages 241-270) – CB/14/04048/FULL – Former Pig Testing Station, Hitchin Road, Stotfold

Additional Comments
Recommended Decision amended to -
To grant planning permission subject to the completion of a S106 Agreement.

Letter from DLP Planning LTD the applicant's agent as an attachment

Letter of support received from Luminus Homes as an attachment.

Additional/Amended Conditions/Reasons

Additional conditions:

Prior to the occupation of any part of the development hereby permitted, and unless otherwise agreed in writing with the local planning authority, the highway works as indicated on plan Nos. 008 and 009 shall be implemented as approved.

Reason: In order to minimise danger, obstruction and inconvenience to users of the highway and the premises.
(Policy 43, DSCB)

No development shall take place until details of the existing and final ground and slab levels of the buildings hereby approved have been submitted to and approved in writing by the Local Planning Authority. Such details shall include sections through both the site and the adjoining properties, the location of which shall first be agreed in writing with the Local Planning Authority. Thereafter the site shall be developed in full accordance with the approved details.

Reason: To ensure that an acceptable relationship results between the new development and adjacent buildings and public areas.
(Policy 43, DSCB)

Item 9 (Pages 271-284) – CB/15/01355/OUT – Land East of Hitchin Road South of 159 Hitchin Road, Stotfold, Hitchin, SG5 4JH

Additional Consultation/Publicity Responses
Late comments from Archaeology on submitted Heritage Assessment - No objections subject to condition.

Landscape Planner - Since my comments on .26.05.15 I have received copy of the Landscape and Visual Statement produced by TLP which is of great assistance; from the assessment findings and recommendations for landscape mitigation, including the potential to include a green / brown roof within the school building to further assist in integrating development, I have no further queries regarding this outline application.

Additional Comments
The applicant's agent has confirmed the intention to provide a signalised crossing on Hitchin Road to provide safe access to Fairfield Park. An appropriate condition is outlined below.

Additional/Amended Conditions/Reasons

Archaeology condition as follows -
No development shall take place until a written scheme of archaeological investigation; that adopts a staged approach and includes post excavation analysis and publication, has been submitted to and approved in writing by the Local Planning Authority. The said development shall only be implemented in full accordance with the approved archaeological scheme."

Reason: (1) To record and advance understanding of the archaeological resource which will be unavoidably destroyed as a consequence of the development in accordance with Chapter 12 of the National Planning Policy Framework and Policy 45 of the Development Strategy for Central Bedfordshire (Pre-submission version June 2014).

(2) This condition is pre-commencement as a failure to secure appropriate archaeological investigation in advance of development would be contrary to paragraph 141 of the National Planning Policy Framework (NPPF) that requires the recording and advancement of understanding of the significance of any heritage assets to be lost (wholly or in part).

No part of the development shall be occupied until details of a new signalised crossing on Hitchin Road has been submitted to and approved by the local planning authority. The crossing shall be provided as approved prior to the building being first brought into use.

Reason: In order to minimise danger, obstruction and inconvenience to users of the highway and the premises.
(Policy 43, DSCB)

Item 10 (Pages 285-304) – CB/15/01111/FULL – Larkswood Ltd, Bedford Road, Aspley Guise, Milton Keynes, MK17 8DJ

Additional Consultation/Publicity Responses

Aspley Guise Parish Council – further representation in terms of the Heritage Statement. They now agree that the office building at the front is part of the listing and therefore should not be demolished. They have concerns that the Heritage Statement is incomplete and does not include the following information:

- Details of use and development of the site in the 20th Century; use of front building as a garage and use of the site by military during WWII
- Details of any changes to the listed building and the other buildings on the site since the first listing
- Any planned changes to the listed building to allow it to be brought back into use.

There are some trees at the entrance that will need to be cut back or reduced in size to allow access to the office building if it is to be retained.

We are of the opinion that an application for Listed Building Consent should also be required for the proposed development.

Principal concern remains the impact that this development would have on the already severe traffic problems on Bedford Road.

5 Spinney Lane

Concerns regarding privacy although understand that the distance is over 21 metres and therefore unlikely to be a significant issue for the Council. A further concern is the boundary treatment along the pedestrian access to Spinney Lane and whether this would be sufficient to preserve our privacy.

Lark Rise – Gypsy Lane

The existing access is inadequate to serve the scale of the development proposed. Consideration does not appear to have been given to agreeing an alternative means of access to overcome this problem. As a consequence the proposal does not accord with policies within the draft development plan (for example policies 37 and 43). Alternative means of access should be investigated to see what improvements can be made.

Additional Comments

Officer comments

The Parish Council have made representations in relation to the Heritage Statement – both the Council's Archaeological Officer and the Conservation Officer are content with the information submitted in the statement.

The Council are content that the proposal does not require Listed Building Consent at present. Certain works to the building at the front of the site, to bring it back into use, may require a Listed Building Consent application prior to the works being undertaken. The agent has been advised of this and will work with the Council to ensure the appropriate applications are submitted when required.

In terms of the representation from 5 Spinney Lane, a boundary treatment condition will be added to the grant of any planning permission to ensure an appropriate level of privacy is maintained at this point. The agent has confirmed that any boundary treatment would be added on their land and at the height of the current walkway –this would provide an effect form of boundary treatment.

A revised site layout plan has been submitted due to a small discrepancy on the eastern side boundary. There was a small difference between the previous site layout and the title plans. The plan has therefore been amended to reflect the title plan, this has involved no change to the overall layout of the development and resolves any future ownership issues.

Council's Ecologist
The Council's Ecologist is content that the buildings show no apparent bat interest and no further surveys are required.

Additional/Amended Conditions/Reasons

Amended conditions:

Condition 4 should read as follows:

The entire on site vehicular areas shall be constructed and surfaced in a stable and durable manner, and arrangements shall be made for surface water drainage from the site to be intercepted and disposed of separately so that it does not discharge into the highway.

Reason: To avoid the carriage of mud or other extraneous material or surface water from the site so as to safeguard the interest of highway safety and reduce the risk of flooding and to minimise inconvenience to users of the premises and ensure satisfactory parking of vehicles outside highway limits.

Condition 10 should read as follows:

Notwithstanding the approved plans, all new rainwater goods shall be of black painted [cast iron/aluminium] and shall be retained thereafter.

Reason: To safeguard the special architectural and historic interest of the setting of the listed building.
(Policy 45, DSCB)

Condition 14 should read as follows:

The link through to Spinney Lane shown on the site plan shall be retained for pedestrian access only. Details of a scheme to restrict vehicular access shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented prior to the first occupation of the development and retained in perpetuity thereafter.

Reason: To ensure that this is available for pedestrian use only. (Policy 43, DSCB)

Condition 15 should read as follows:

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers PL01 A; PL02 E; PL04 A; PL05 A; PL06 A; PL07 A; PL08 A; PL09 A; PL10 A; PL11 A; PL12 A; PL13 A; PL14 A; PL15 A; PL16 A; PL17 A; PL18 A; PL19 A; PL22

Reason: To identify the approved plan/s and to avoid doubt.

Additional condition – Condition 16:

A scheme shall be submitted for approval in writing by the Local Planning Authority indicating the positions, design, materials and type of boundary treatment to be erected. The boundary treatment shall be completed in accordance with the

approved scheme prior to the first occupation of the development and be thereafter retained.

Reason: To safeguard the appearance of the completed development and the visual amenities of the locality.
(Policy 43, DSCB)

Item 11 (Pages 305-326) – CB/15/01454/MW – Mount Pleasant Golf Course, Station Road, Lower Stondon, Henlow, SG16 6JL

Amended Condition 17

HGV* movements into/out of the site shall be limited to a maximum in any one day of 182 (pro rata for part days), with no more than a maximum of 14 movements per hour during the peaks of 08:15am to 09:15 and 15:15 to 16:15pm Monday - Friday. REASON: In the interest of highway safety. MWLP(2005) GE23.

*All vehicles over 7.5 tonnes gross vehicle weight.

Item 12 (Pages 327-336) – CB/15/01095/FULL – Hillside, Chalk Hill, Houghton Regis

Additional Consultation/Publicity Responses
The Highways Officer provided the following additional consultation response:

"I understand that the Housing Department will have nomination rights in respect to the proposed HMO.

There are no current parking standards for this specific use, therefore in situations like this; we need to consider the needs of the end user.

I understand that the accommodation will be offered to vulnerable members of the public, who may not necessarily have the benefit of their own vehicle.

It is therefore reasonable to accept that the parking demand generated by the proposal will not be excessive.

The applicant states that there are currently eight parking spaces available and no additional spaces are proposed. Unfortunately, there is no parking layout submitted, therefore I cannot comment on the suitability of the layout.

I consider eight parking spaces is reasonable for the proposal, but I would insist on a parking layout to be submitted and approved in support of this. This may be submitted prior to determination or conditioned.

The access to the site is via the A5 trunk road, currently managed by Highways England, I also understand they have raised no objection and therefore are content that the proposal will not affect their junction. The access then leads in to a single

lane 'shared use' private drive, which increases in width as you approach the car park. This private access provides both vehicular and pedestrian access to the existing development and is intended to provide a similar use for the proposed development. I would advise that due to the gradient of the access you consider suitable provisions are made for pedestrian safety, guard rail, anti slip surfacing etc.

The overgrown verge to the right hand side on exit of the site is public highway and requires some reduction in height, in order to provide driver/driver visibility along Chalk Hill. Chalk Hill is effectively a cul-de-sac and is subject to a 40mph speed limit. However, the geometry of the carriageway, which is also shared by pedestrians, is such that speeds will be far lower than this. I suggest a visibility splay of 2m x 43m is considered appropriate.

The trip generation database TRICS, indicates that the trip generation for the existing twelve bedroom unit could generate approximately 1.7 trips per bedroom totalling just over 20 trips per day. Unfortunately the House of Multiple Occupancy category is not covered in the TRICS data base. The nearest equivalent is Local Authority Flats, even then this option is based on self contained units and is considered to be slightly higher than that for HMO. The trip generation for the LAF is approximately 2 trips per bedroom totalling 28 trips per day. I suggest that taking a figure between the two trip rates would seem reasonable for HMO. Therefore I suggest a figure of 1.85 trips per bedroom could be regarded as appropriate for HMO. This equates to a daily trip generation of 26 trips. I would also add that as we now know the end user for the current proposal, which may have the potential for a reduced car ownership, it is reasonable to suggest that that the proposed traffic generation would be less than 26 trips per day.

Therefore even considering the worst case scenario the proposal could generate an extra 6 trips per day, the equivalent of 3 vehicles entering and leaving the site.

On this basis I would not be in a position to recommend refusal of the application on highway grounds, but I would recommend conditions are imposed if permission is to be granted."

Following receipt of these comments, a parking plan was submitted and the Highways Officer made the following comments:

"It is clear that eight parking spaces can be accommodated within the site, although I would recommend that bays 3 and 4 are rotated at 90 degrees as their current configuration will be impossible to use. There is normally a 6m aisle width in front of a parking space to allow for manoeuvring.

The remainder of the forecourt area has sufficient space to allow a light goods vehicle to enter, turn around and leave the site with care, in forward gear.

I also have spotted an error in my earlier comments, Chalk Hill is subject to the national speed limit and not 40mph as stated in my comments, (the A5 is subject to the 40mph limit bizarrely) this has no affect on my recommendation as speeds along the cul-de-sac will be low due to it's geometry and use."

Following receipt of these comments, the parking plan has been revised to show bays 3 and 4 rotated at 90 degrees.

Additional Comments
Additional information has been provided by the Private Sector Housing Team as follows:

Should planning permission be granted, the Council would have nomination rights to the property for a period of 10 years. The Council would seek to use these nomination rights for those who are currently homeless.

The property would be managed by Omega. There would be no warden living on site, however, it is likely that there would be a small office on site which would be visited regularly by one of the Omega team and residents would be provided with a telephone number, available 24/7 in case of emergency.

The garage is not available for parking as it has the oil fired boiler in it. The Landlord will retain access to the garage.

Additional/Amended Conditions/Reasons
The schedules of suggested conditions and informatives have been revised as follows:

Conditions

1 The development hereby permitted shall begin not later than three years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2 Visibility splays shall be provided at the junction of the access with the public highway before the development is brought into use. The minimum dimensions to provide the required splay lines shall be 2m measured along the centre line of the proposed access from its junction with the channel of the public highway and 43m to the north west, measured from the centre line of the proposed access along the line of the channel of the public highway. The required vision splays shall, on land in the applicant's control, be kept free of any obstruction.

Reason: To provide adequate visibility between the existing highway and the proposed access, and to make the access safe and convenient for the traffic which is likely to use it.
(Policy BE8, SBLPR and Policy 43, DSCB)

3 The development shall not be occupied or brought into use until the parking scheme shown on Drawing No. CBC/001 has been completed. The scheme shall thereafter be retained for this purpose.

Reason: To ensure provision for car parking clear of the highway.
(Policy T10, SBLPR and Policy 27, DSCB)

4 The change of use hereby permitted shall not take place until a scheme for the parking of cycles on the site has been submitted to and approved in writing by the Local Planning Authority and the approved scheme has been fully implemented.

Reason: To ensure the provision of cycle parking to meet the needs of occupiers of the proposed development in the interests of encouraging the use of sustainable modes of transport.
(Policy BE8, SBLPR and Policy 43, DSCB)

5 The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers 15-403-01, 15-403-02, 15-403-03, 15-403-04, 15-403-05, CBC/001.

Reason: To identify the approved plans and to avoid doubt.

INFORMATIVES

1. This permission relates only to that required under the Town & Country Planning Acts and does not include any consent or approval under any other enactment or under the Building Regulations. Any other consent or approval which is necessary must be obtained from the appropriate authority.

2. The applicant is advised that the requirements of the New Roads and Street Works Act 1991 will apply to any works undertaken within the limits of the existing public highway. Further details can be obtained from The Street Works Co-ordinator, Bedfordshire Highways, by contacting the Highways Helpdesk 0300 300 8049.

3. The applicant is advised that in order to achieve the vision splays in condition 2 of the permission it may be necessary for vegetation overhanging the public highway to be removed. Prior to the commencement of work the applicant is advised to contact Central Bedfordshire Council's Customer Contact Centre on 0300 300 8049 to request the removal of the overhanging vegetation on the public highway.

4. Please note that the unnumbered drawings submitted in connection with this application have been given unique numbers by the Local Planning Authority. The numbers can be sourced by examining the plans on the View a Planning Application pages of the Council's website www.centralbedfordshire.gov.uk.

Item 13 (Pages 337-350) – CB/15/01762/FULL – Leighton United Football Club, Stanbridge Road, Tilsworth, LU7 9PL

Additional Consultation/Publicity Responses

Two additional emails have been received from the owner of Tilsworth Stud Farm. The first provided an article from the journal Biochemical and Biophysical Research Communications entitled *Tumour promotion by exposure to radiofrequency*

electromagnetic fields below exposure limits for humans. This article is attached as an appendix.
The second email states the following:

- I gathered the original mobile mast at Tilsworth will be relocated because the mast is not high enough. The proposed site for the mobile mast at Leighton United Football Club is the lowest level round the area and its about 15 feet below the Stanbridge Road level.

- The proposed site is situated near the pylons and power lines. I gathered from the supporting documents for the application, some of the sites (e.g. Bury Farm) were rejected due to the close proximity to overhead power lines. In fact, the proposed site is nearer to the power lines than those sites rejected.

- Furthermore, they have not explored all the available sites for the siting of the mast as I own Tilsworth Stud, approximately 50 acres, situated round Tilsworth, and I was never approached by the phone company or any related personnel.

- The surveyor from the mobile mast company has indicated to the owner of Granary Farm that the site was by far the most suitable with access and electricity available. As to why this site is not chosen, is open to speculation, perhaps cost is an issue.

A further email has been received from Andrew Selous MP, which also included an email from the owner of Tilsworth Stud Farm. The email from the owner of Tilsworth Stud Farm states the following:

- The dangers that these mobile masts pose to humans and animals are only recently beginning to be recognised. The recommended safety guidelines are based on studies done sometime ago and hence not accurate, especially in line with recent research work (see article 'Tumour promotion by exposure to radiofrequency electromagnetic fields below exposure limits for humans').

- Furthermore, humans and animals near mobile masts are exposed to the harmful radiation 24 hours daily all year round. Animals are more exposed as they are out in the fields and not protected by any buildings. Constant radiation exposure from the mobile masts does not allow the cells affected to recover before further exposure and hence, more dangerous than radiation from mobile phones.

- There is evidence in Europe that mobile phone companies are having to remove and resite mobile phone masts due to the high incidence of cancer related deaths. The residents of Benajanafe in Spain after a two year battle forced the operator, Vodafone, to remove a controversial transmitter which stood just meters away from the houses which was thought to be the main cause of the high incidents of deaths from cancer.

- Studies by Alfonso Balmori show that white stork population nesting on mobile masts showed marked infertility and embryonic death compared to white storks nesting elsewhere. This study clearly demonstrates that mobile masts

emitting so called safe level of radiation within European government guidelines caused infertility in the white storks.

- Two separate experiments done on mice, the latest one by Professor Dr Alexandra Lerchl and his team, which was released this year. The team shows that the long term radiation exposure to radiofrequency electromagnetic fields acts as a co-carcinogen and increases cancer growth. The level of exposure is 50 folds below current permitted levels (see enclosed article). This study is concrete proof that radiation from mobile masts causes growth in animals but as usual these experiments are generally not exactly transferable to the situation in humans. However, these findings show that - in principal - tumour promoting effects of life long radiation exposure may occur at levels supposedly too low to cause thermal effect.

- Orange wanted to erect a mast in Harrow, West London but was rejected by the council and the company appealed to the Department of Environment and Transport. This was rejected again by the government planning inspectors. Although applications for mobile phone masts have previously been rejected on health grounds by councils, including Barnet, Kent and Worcester, this is the first time the matter has gone as far as the Planning Inspectorate and been rejected. Inspectors are preparing to issue local authorities with guidelines advising them that all telecommunications companies should provide concise details about the risks of potential radiation emissions when applying to put up masts. In view of this, Central Bedfordshire must not have received these guidelines and perhaps you could look into the matter as it may be grounds for refusal.

- An alternate site is located by the surveyor from the mobile phone company at Granary Farm. According to the surveyor, this site is the most suitable as it is away from any inhabitants, easily accessible and electricity is available and yet it is not chosen. One can only speculate the reason why, costs.

- I am writing to you as my MP to see if you could intervene in any way considering all the facts available to stop the mast from being erected in this site. Furthermore, hundreds of children playing in the football fields directly under the mast will be expose to the danger of the mobile mast radiation. It would be sensible to adopt a prudent policy to site this mast away from children's playgrounds as adopted by the Cornwall Borough Council.

Mr Selous requested that the Development Management Committee take into account this information prior to determining the application. He refers to previous correspondence that valuable horses will be grazing 24/7 in the field next to the mast and that footballers will be using the football pitches next to the mast.

Mr Selous also requested information in regards to the guidelines referred to by the owner of Tilsworth Stud Farm.

One additional letter for support has been received from a resident of Leighton Buzzard. The letter states that the proposal would improve mobile reception in the area and would provide the local community children's football club with much needed funding.

Additional Comments
Officers have contacted both the Planning Inspectorate and the Department for Communities and Local Government to discover if new guidelines in regards to the siting of telecommunications masts are due to be released. Representatives of both organisations have informed officers that they are unaware of any new or upcoming guidelines in relation to telecommunications masts.

As part of the Government's Productivity Plan, a Call for Evidence has been issued, entitled "*Review of How the Planning system in England can support the Delivery of Mobile Connectivity".* This document strongly supports the deployment of mobile infrastructure in all areas as quickly as possible. It seeks evidence as to whether increases in the scope of permitted development rights to include taller mobile masts could help support the Government's ambitions for improved mobile coverage.

The comments from the owner of Tilsworth Stud Farm raises questions about the site selection exercise carried out by the applicant. However, it is not considered that this outweighs the benefits of the scheme, both in terms of increased mobile phone signal and the benefits that the scheme would bring to Leighton United Football Club.

In regards to the health implications of the proposal on humans and animals, this is addressed within the main report and there are no further comments to make on this issue.

Additional/Amended Conditions/Reasons
None.

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Tumor promotion by exposure to radiofrequency electromagnetic fields below exposure limits for humans

CrossMark

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ABSTRACT

The vast majority of in *vitro* and *in vivo* studies did not find cancerogenic effects of exposure to electromagnetic fields (RF-EMF). i.e. emitted by mobile phones and base stations. Previously published results from a pilot study with carcinogen-treated mice, however, suggested tumor-promoting effects of RF-EMF (Tillmann et al.. 2010). We have performed a replication study using higher numbers of animals per group and including two additional exposure levels (0 (sham), 0.04. 0.4 and 2 W/kg SAR). We could confirm and extend the originally reported findings. Numbers of tumors of the lungs and livers in exposed animals were significantly higher than in sham-exposed controls. In addition. lymphomas were also found to be significantly elevated by exposure. A clear dose—response effect is absent. We hypothesize that these tumor-promoting effects may be caused by metabolic changes due to exposure. Since many of the tumor-promoting effects in our study were seen at low to moderate exposure levels (0.04 and 0.4 W/kg SAR), thus well below exposure limits for the users of mobile phones. further studies are warranted to investigate the underlying mechanisms. Our findings may help to understand the repeatedly reported increased incidences of brain tumors in heavy users of mobile phones.

1. Introduction

The increased use of mobile phones during the last two decades was accompanied with fears that their emission of radiofrequency electromagnetic fields (RF-EMF), sometimes also called "radiation", may have adverse health effects. So far, no biophysical mechanism has been identified which would speak in favor of such effects since the quantum energy in the frequency range used for mobile communication is far too low to break chemical bonds. The only accepted mechanism by which RF-EMF could be harmful is heating which is prevented at the current exposure limits for the general population (specific absorption rate (SAR) 0.08 W/kg whole body; 2 W/kg local exposure)111. Some epidemiological studies, however, have found increased incidences of brain tumors in heavy users of mobile phones 12,31.

In 2010, a study was published 141 showing tumor-promoting effects of life-long exposure to RF-EMF (Universal Mobile Telecommunication System, UMTS) at moderate exposure levels in mice treated with a carcinogen (ethylnitrosourea, ENU) *in utero.* Those results were potentially influenced by an unexpected infection with *Helicobacter hepoticus* (which may have had an influence on the pathological findings in the liver, as suggested by the authors). Nevertheless the data showed clear effects of RF-EMF exposure on the incidences of lung and liver tumors. We have replicated this study with higher numbers of animals per group, but otherwise under similar conditions, in order to clarify whether the previously reported results could be confirmed. In addition, two additional SAR levels of exposure (low and high) were included in order to investigate possible dose—response relationships.

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Furthermore, we ensured that we did not have any infection with Helicobacter species in our animals.

2. Materials and methods

2.1. Experimental design

The experiment was performed according to the German Animal Welfare Act and approved by the local authorities (city state of Bremen). Special care was taken to repeat the study by Tillmann et al. [41 as accurately as possible. Male C3H/HeNCrl (n = 43) and female C57B1i6N (n = 290) mice were purchased in a staggered design from Charles River Germany, Sulzfeld, Germany, at an age of 8-9 weeks. After acclimatization, at the age of 12 weeks (females), the males and 128 females were mated for one week (ratio 3 females: 1 male) in two rounds, thus a total of 256 potentially pregnant females were obtained. They were distributed to the 128 cages of the exposure devices, two animals per cage. Exposure or sham-exposure of the pregnant females thus started at day 6 p.c. (post conception). All females were weighted at day 13 p.c., and the ones with the highest weight gains remained in the exposure devices while the others were sacrificed (CO_2 overdose). The remaining 34 females, age 12 weeks, were mated with the males, and the female offspring served as the untreated, unexposed cage control (n = 96, three animals per cage). At day 14 p.c., the females in the exposure devices were injected (i.p.) with ethylnitrosourea (ENU; Sigma—Aldrich, Taufkirchen, Germany) at a dose of 40 mg/kg in saline. Six days after birth, after sexing three female Fl animals were left with their mothers, while the surplus females and the males were removed and sacrificed. Litters with too few female pups were filled up with surplus females from other litters of the same exposure group. In total, four groups of female Fl mice were obtained, 96 animals per group. At day 21, pups were weaned, and the dams were sacrificed.

22. Exposure to electromagnetic fields

The exposure devices consisted of eight radial waveguides with 16 cages each, arranged in stacks of two and connected to power amplifiers and RF-generators. Details have been published earlier [5]. Extensive numerical calculations of the field distributions and the corresponding SAR values revealed unavoidable substantial variations for animals in different positions and within animals (local maximum SAR values) which could be as much as 3-5 times higher than the whole-body SAR. Two waveguides per exposure group with 16 cages each (32 cages in total, 96 animals) were one out of four groups with the following nominal whole-body SAR levels: sham-exposed (0 W/kg), 0.04 W/kg (low), 0.4 W/kg (moderate) and 2 W/kg (high) for a reference configuration of three mice (body weight 20 g each) per cage, with a standard deviation for this configuration of around 36%. The exposure was comparably homogeneous with standard deviations of the whole body SAR within

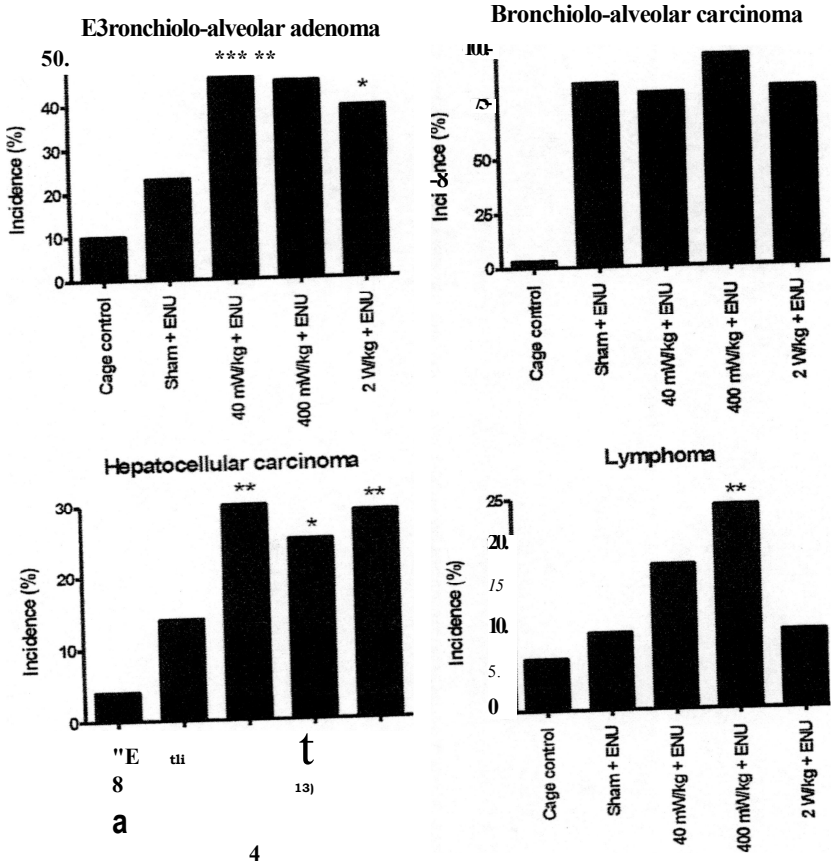

Fig.l. The effects of life-long exposure to RF-EMF in mice treated with ENU in *utero.* Shown are the tumor incidences as percentages of animals, based on histopathological analyses of 93-96 animals per group. Significant differences are indicated by asterisks (Fisher's one-tailed exact test): *. $p < 0.05$; **. $p < 0.01$; ***. $p < 0.001$.

the cages between 30% (adult animals) and 91% (pups) due to spatial electric field variations and movement of the groups of animals. In order to equalize the exposure between the 16 cages of each waveguide (max. 12% variation of the cages mean electric field strengths), the cages were permuted every second day by one exposure section. Exposure was 24/7 for the entire period (72 weeks) with the exception of half an hour each night at 3 a.m. in order to shut down the generators and to reboot the system. It should be noted that exposure was interrupted for 4 h daily in the previous study [41 for animal caretaking. Another difference was due to different geometries of the radial waveguides used in the previous study and in the present one (diameter of the three waveguides with 20 cages each were 1.9 m in Ref. [4]. and 2.2 m in the present study). Thus, the ratios of whole body SAR values to the respective incident field strengths were different. This difference, however, is not biologically important but only relevant for the SAR calculations.

Electrical fields inside the waveguides as well as temperatures were measured automatically. One power amplifier in the highest exposure group malfunctioned for 20 days (weeks 33-35), producing only one fourth of the SAR during this period, affecting half of this exposure group. All other generators and amplifiers worked without failure so that the total time without exposure was minimal (0.5%). Exposure conditions were not known to the persons handling the animals or otherwise being involved in the experiment. Only after all data have been analyzed, they were sent to the cooperating partners (University of Wuppertal) in exchange with the exposure codes.

2.3. Procedures during and at the end of the experiment

The mice were routinely inspected visually, and their body weights were recorded weekly during the first 14 weeks, and thereafter every two weeks. After one year (week 52), pooled feces samples alai' cages were collected and checked for the presence of *Helicobacter ssp.* (PCR analysis, Charles River). None of the samples was positive. When signs of disease were noted, or when the body weight of an animal showed a sudden drop, these animals were removed from their cages, sacrificed by CO2, and immediately dissected. All surviving animals, including the cage controls, were sacrificed when survival rates of the ENU-treated animals dropped below 25% (OECD guideline No. 451 'Carcinogenicity Studies'). Due to a technical mishap, sham-exposed and exposed (2 W/kg) animals were sacrificed 1-2 weeks too early or too late, respectively. Gross morphological abnormalities were noted, and the following organs were immersion-fixed: brain, kidneys, spleen, liver, and lymph nodes. Lungs were immersion-fixed after intratracheal instillation of formalin (37%). Tissues (except lymph nodes) were embedded in paraffin, and sections of 4 um were stained with hematoxylin/eosin. Histopathological examination was done according to international standards [61. To ensure that our diagnoses were correct, a set of 107 sections with different tumors were cross-checked by a professional pathologist No deviations from our diagnoses were found.

2.4. Statistical analysis

Comparisons of body weights was done by parametric analysis of variance, followed by repeated measures post-hoc test. Survival times were compared by log-rank test (SPSS v. 22, IBM). Incidences of tumors were compared by Fisher's exact test (one-tailed) using the program GraphPad Prism (GraphPad Software, San Diego, CA, U.S.A.). For the Bayesian analysis, a script was programmed in R 171.

3. Results

Our study confirms and extends the previously published observations of tumor-promoting effects of life-long RF-EMF

Table 1
Incidences of neoplastic and pre-neoplastic tumors.

Lesions	Cage control	0 W/kg	0.04 W/kg	0.4 W/kg	2 W/kg
	[96]	196j	[92]	[96]	0 (0 %)
Cerebrum					
Mixed Glioma [TA!	0 (0%)	0 (0%)	0 (0%)	1 (1%)	1 9 6 I
Oligodendroglioma [M I	0 (0%)	1 (1%)	0 (0%)	1 (1%)	1 9 6 1
Oligodendroglioma [B]	0 (0%)	1 (1%)	0 (Q %)		[961
Astrocytoma IBI	0 (0%)	1 (1%)	0 ( )	0:0% ;	0 (0%)
IvMeningioma [B]	0 (0%)	*I* (1%)	0 (0%)	22%)	1 (1%)
Lungs	[961	[96]	194i		O -: -
Bronchiolo-Alveolar Carcinoma [M]	3 (3%)	81 (84%)	74 (79%)	g 2 :96 t·	O
Bronchiolo-Alveolar Adenoma [B]	10 (10%)	22 (23%)		43 **oar** —	77,1:1:1,1;
Bronchiolo-Alveolar hyperplasia	3 (3%)	7 (7%)	7 (7%)	9 (9% 3	
Liver	[96]	(96)	[93j		31.,3V
Hepatocellular Carcinoma [M I	4 (4%)	13 (14%)	28 (30%)'	2425% T	211.
Hepatocellular Adenoma 1111	37 (39%)	33 (34%)	37 (40%)	34 :35% 1	33 .43W
Hepatoblastoma [M I	0 (0%)	3 (3%)	3 (3%)	1 (1%)	1f111)
Hemangiosarcoma [M]	0 (0%)	2 (2%)	3 (3%)	3 (3%)	3 3 ;
Hemangioma (BI	3 (3%)	4 (4%)	1 (1%)	2 (2%)	2
Focus/Foci of hepatocellular alteration	9 (9%)	14 (15%)	15 (16%)	1 8 (1 9 %)	
Bile duct hyperplasia	0 (0%)	2 (2%)	0 (0%)	1 (1 %)	
Kidneys	[961	[96]	[91]	[96)	1961
Renal Tubule Carcinoma 'M I	0 (0%)	2 (2%)	3 (3%)	7 (7%)	5t5%
Renal Tubule Adenoma [B]	2 (2%)	3 (3%)	2 (2%)	5 (5%)	2f2%
Renal Tubular hyperplasia	0 (0%)	5 (5%)	3 (3%)	5 (5%)	0 (0%
Spleen	[96]	[96]	(93)	1961	1961
Hemangiosarcoma [M]	2 (2%)	3 (3%)	1 (1%)	0 (0%)	0 (0%
Hemangioma [B]	0 (0%)	1 (1%)	1 (1%)	2 (2 %)	
Stromal hyperplasia	1 (1%)	7 (7%)	8 (8%)	8 (8%)	5 (5%)
Hematopaymphorel Tissue	[96]	(96)	[93]	[96)	1961
Lymphoma [M]	6 (6%)	9 (9%)	16 (17%)	23 (24%)'	9 (9%)
Histiocytic Sarcoma [M]	0 (0%)	4 (4%)	2 (2%)	1 (1%)	2 (2%)

Numbers in squared brackets represent the numbers of animals from which the respective organs were examined.
(15) Benign neoplasia/1M]Malign neoplasia.
1",v < 0,05; '"sp < 0,01; `"p < 0.001 vs. sham (Fisher's exact test. one-tailed).

exposure. The numbers of both adenomas and carcinomas were significantly increased in the lungs, and carcinomas were significantly elevated in the livers of RF-EMF exposed animals (Fig. I. Table 1). As compared to the sham-exposed control mice, numbers of animals with bronchiolo-alveolar adenomas (lungs) were doubled at low and moderate SAR levels, and hepatocellular carcinomas were nearly or more than doubled at low, moderate, and high SAR levels, respectively. The numbers of multiple tumors were found to be significantly elevated at 0.04 W/kg (bronchiolo-alveolar adenomas, Table S1). The numbers of animals with lymphomas were increased 2.5 fold at moderate SAR levels (Fig. 1, Table 1). No increased tumor numbers were found in the brains, kidneys, and spleens of the exposed animals. Here the tumor rates were well below 10%. As expected, survival times in all ENU-treated animals were much lower than in cage controls, but not affected by exposure (Fig. S1). Body weights of (sham-) exposed animals were only slightly different from untreated, unexposed cage-control mice (Fig. S2).

Fig. 2 shows a comparison of the findings of the previous and the present study for the lung tumors due to exposure for a nominal SAR level of 0.4 W/kg (moderate) since this one was used in both studies. It is obvious that both studies are in good agreement.

To address the debates about both the usefulness of null hypothesis significance testing (NHST) in general 18-101, and the proper statistical analysis of replication studies 01-131, we additionally performed a Bayesian analysis. Exemplary analysis results for the lung tumors due to exposure at moderate levels as compared to sham-exposure are presented in Fig. 3.The hypothesis of no difference between the exposed and the sham-exposed animals is outside the 99% prediction interval for all analyses no matter whether an uninformative prior is used or an informative one based on the results from the previous study. As can be expected from the significance of the results in Ref. 141, the posterior distribution derived from the informative prior is shifted towards the right and the prediction intervals are further away from the hypothesis of no difference.

4. Discussion

The fact that both studies found basically *the* same tumor-promoting effects at levels below the accepted (and in most countries legally defined) exposure limits for humans is worrying. Although animal experiments are generally not easily transferable to the situation in humans, the findings are a very clear indication that — in principal — tumor-promoting effects of life-long RF-EMF exposure may OCCUT at levels supposedly too low to cause thermal effects. The basis for defining safety guidelines regarding RF-EMF exposure by mobile phones and other RF-EMF emitting devices relies on the assumption that increases in temperature above a certain threshold are the only way how exposure can cause damage (thermal effects). These are clearly prevented by the exposure limits. However, the RF-EMF energy absorbed by the tissues or organisms, respectively, is converted to thermal energy regardless the exposure dose. As a consequence, this thermal energy influences to some extent the energy balance of tissue and the entire organism. It was shown that RF-EMF exposure at low levels (0.08 W/kg) causes increased body weights in hamsters which indicates a shift in metabolism of food 1141. Other experiments in hamsters have shown that the consumption of food and the production of CO_2 is decreased by RF-EMF exposure, albeit only at relatively high SAR-levels [15]. It is therefore plausible to assume that RF-EMF energy, when absorbed and converted into thermal energy, influences metabolism and energy balance to some extent which may play a role for the observed tumor-promoting effects.

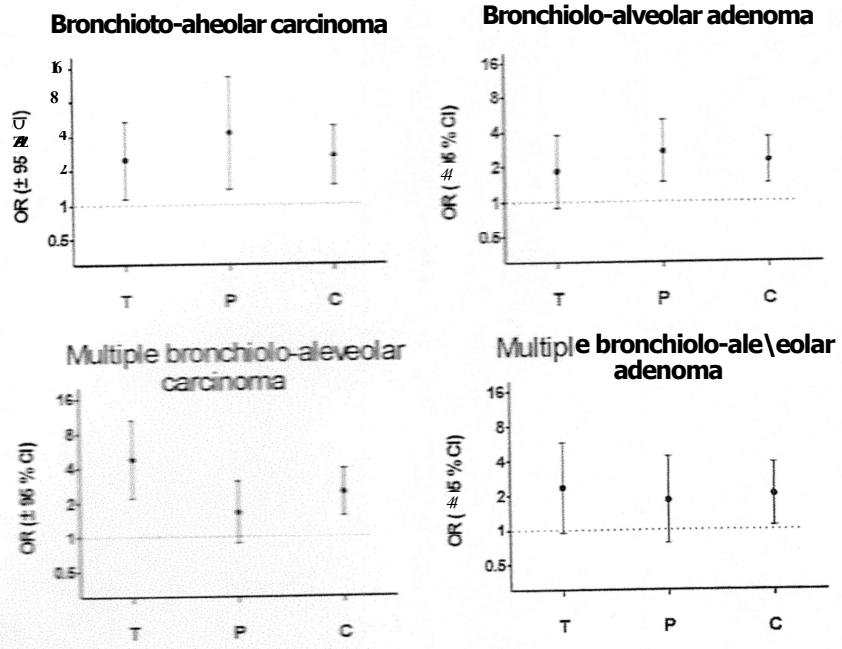

Fig. Z. sam 95% conf 3eate 3. `.' - _ by atimar.-- .(2010) [4] and the present dat 77'7 !be 1.7- for lung tumors at moderate exposure levels. Since both studies followed the *Wel:*h overlapping SAR ranges. the results were combined_ Data are expressed as odds ratios (OR) with with OR – 1 (dashed line) indica US significantly elevated ORs. T. iillmann et al (2010): P. present study; G

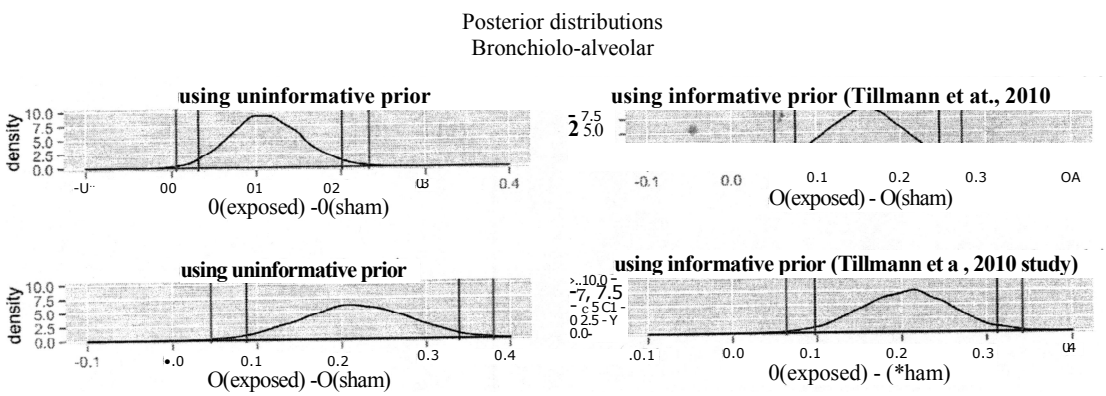

Fig. 3. Results from a Bayesian analysis showing the posterior probability distributions for the parameter differences between moderate exposure levels and sham exposure for lung tumors. The upper panels show the results for the bronchiolo-alveolar carcinoma, the lower panels show the results for the bronchiolo-alveolar adenoma. The plots on the left show the posterior distributions derived from an uninformative prior (a uniform distribution over the parameter space), while the distributions on the right are derived using the results from the study by Tillmann et al. (2010)141 to define the prior distribution. The vertical lines indicate the boundaries of the 95% (blue) and 99% (red) prediction intervals. The peaks of the distributions indicate that there is an expected increase in lung cancer of more than 10 percentage points for the moderate exposure level in contrast to sham exposure, and an increase of about 20 percentage points for the adenoma. (For interpretation of the references to colour in this figure legend, the reader is referred to the web version of this article.)

In this context it is important that the carcinogen ENU was administered to the pregnant mice at day 14 of pregnancy. We do not know at which time periods after the treatment with the carcinogen the tumor-promoting effects occurred. Early studies [i(ij clearly demonstrated that the prenatal time point of ENU-administration is crucial for **the development of tumors in the adult. Since the cardnogen** was **administered to the pregnant females while being already exposed to RF-EME it is possible that immediately after ENU-treatment the promoting effects happened. Alternatively, they occurred durum' the later stages of development. Another possibility** why **tumor-promoting effects were seen in both studies is that the uptake of the carcinogen by the fetuses was higher in the exposed animals *due* to elevated metabolism. Studies addressing this cr..:-H-Jon -a-e dearly nee&d.**

Another point of the absorption of RF-EMF by tissue in relation to blood flow .V . z2Iculations are based on the electric properties of the 55_s **tlectric conductivity), blood flow is** rr: 7775': 2: **was not considered for our SAR - De** p055it-2. **by computing** the localheata·,..:.7usst **ti·ics of** bkxxlflow . It is known. however. thzthirtm tiII.:A ;I/ 1e:7_5 .-s as **as in tumors** is considerably it **sitir low er. iv.t com pared to other tissues F -)(bed RF-EMI energy may lead to differe, _ -Zr: effeas which, in turn,** may help _ 7-p::,.moting effects as seen here. -S 01 ia 5flK 50 StiSS the **importance of exposure - are unfortunately often S . :r .7f:a y** different **studies.** For promoting effe in transgenk m ice prone for developing lymphomas [18]. Two replication studies **did not confirm these ef** fects [19 3oth replication **studies, however, deviated from** original st **the : in several ways. Not only were *the* exposure** different, b **z also were the mice in the replication studies** exposed wi **restrained (in tikes). whereas in the original** study the **mice were non-restrained. While restrained animals avow** exposure **at comparably low SAR variations, the physio- and metabolic** situations are fundam entally different in ie.am panlion to freely moving anim als **1211. In fact, the** able SAR **variations in non-restrained, freely moving animals may** turn out to **be of key importance for the understanding of tumor-** promoting **effects.**

Acknowledgments

We thank Tatjana Simon and Thomas Strehlein for expert technical assistance and Prof. Dr. R.-P. Henke, Institute of Pathology, Oldenburg, Germany, for his kind help in verifying our histopath°logical diagnoses. This study was supported by a grant from the Federal Office for Radiation Protection (BfS), Salzgitter, Germany. The funding agency defined the principal study design which was further developed with the corresponding author. The authors declare no conflicts of interest.

Transparency docum ent

Transparency document related to this article can be found online at http://dx.doi.org/10.1016/j.bbrc.2015.02.1.51.

Appendix **A. Supplementary data**

Supplementary data related to this article can be found at http:// dx.doi.org/10.1016/j.bbrc.2015.02.151.

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dynamic development solutions ™

Our reference: JC/N/BE1567/2
Client reference: --
Council reference: CB/14/04048/FULL
Inspectorate reference: --
Thursday 16th July 2015

Sam Boyd
Central Bedfordshire Council
Priory House
Monks Walk
Chicksands
Shefford
Bedfordshire **SG17 5TQ**

Dear Sam

Former Pig Testing Unit, Hitchin Road, Fairfield Park, Stotfold:
Submission of full planning application for a 70-bedroom care home with parking; 116 dwellings; access, open space and ancillary works

Thank you for your assistance to date in this matter, and for the Officers' report to the 22nd July *Development Management Committee* with its recommendation for approval.

We have carefully read through the report and, whilst being grateful for its balanced assessment of the main issues and its positive recommendation, nonetheless would wish to correct a limited number of factually-inaccurate observations reported from your consultees.

CBC Housing Needs Officer
In respect of affordable housing, for the avoidance of doubt, we have never been requested to complete or submit a *Viability Appraisal*. The Council's emerging and adopted affordable housing policies are inherently flexible, which is particularly relevant to this contaminated site and in the context of the very low locally-arising quantum of housing need. Officers from across the Council have worked closely with the applicant in agreeing a balanced Section 106 package reflective of site-specific and unique local needs, and we refute any suggestion that this would somehow set a precedent for schemes elsewhere.

The Officer's suggestion that an equivalent of 4.3% affordable housing is being provided is misleading and factually incorrect. There is already planning permission for 5no. homes on the site and therefore the net number of additional dwellings is 111. Attributing a commonplace value of £30,000 per affordable unit means that the negotiated £600,000 commuted sum could provide for 20 affordable homes, which in addition to the 5 being provided, equates to **23% affordable housing**.

CBC Economic Development
The site has been vacant for several years, and despite extensive marketing has attracted no commercial interest in its employment redevelopment. Even when fully operational the site employed no more than a dozen people, and for an extended period of time (over 8 years) has employed nobody at all.

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Our reference: JC/N/BE1567/2
Client reference: --
Council reference: CB/14/04048/FULL
Inspectorate reference: --
Thursday 16th July 2015

As the submitted *Employment Land Case* report clearly demonstrates (paragraph 5.47), the previous outline planning permission (which included Use Class B8 within its approved uses) might hope to generate circa 100 full-time employees in a general B8 warehouse, or 110 employees in the open storage and sales/hire of construction plant. By comparison, the submitted *Standard Economic Appraisal Model* predicts 189 jobs during the construction phase of our proposed development, followed by **222 direct, indirect and induced jobs** throughout its occupation.

Even on a simplistic assessment, 70 new jobs will be provided as a result of the proposed 70-bed care home; 150 jobs can be expected to be created per 1,000 head of population, equating to 42 new jobs[1]; homeworkers at Fairfield already account for higher than the national average, which can be proportionally expected to increase through the proposed development; and additional jobs will be created by the new Lower School, wholly facilitated by this application. We cannot accept, therefore, that the scheme fails to provide an equivalence of job creation compared to the previous outline planning permission, when the submitted job creation forecasts demonstrate that a substantially greater quantum of employment opportunities would in fact be created.

We would be grateful if these clarifications and corrections are reported to members on the Update Sheet prior to their consideration of the application. If members have any questions or queries following Monday's site visit, we would be happy to assist in clarifying these ahead of the committee itself on Wednesday.

Kind regards

Yours sincerely

James Croucher MTP MRTPI
Senior Director

Copied to: Lochailort Stotfold Ltd

1 Having applied the 2.4 person average household size to the 116 proposed dwellings, thereby yielding 279 forecast additional residents at a ratio of 0.15 jobs created per person

LUMINUS
HOMES

Samantha Boyd
Senior Planning Officer
Central Bedfordshire Council
Monks Walk
Chicksands
Shefford
Bedfordshire, SG17 5TQ

20 July 2015

Dear Ms Boyd

PLANNING APPLICATION CB/14/04048/FULL:
FORMER PIG UNIT, HITCHIN ROAD, FAIRFIELD PARK

We have read with interest the Committee Report on the above planning application, which we understand is due to be considered by the Development Management Committee on Wednesday 22nd July. Having been in dialogue with the applicant previously in respect of the delivery of affordable housing on this site, we would wish to underline the following:

(i) We are aware of the comparatively low level of affordable housing need in Fairfield, and that only 5 households are currently on the Council's waiting list;
(ii) Having had regard to local housing need data, we support the proposed small family houses (2 and 3 bedrooms) proposed by the developer;
(iii) We are pleased to note the high quality of architecture that the scheme proposes, and that this design quality extends to the proposed affordable units which our view would be indistinguishable from market sale properties.

For the reasons set out above, we support this application and its proposed provision of 5 shared-ownership affordable homes.

Yours sincerely

A. J. Chapman

ANDY CHAPMAN
DIRECTOR OF FINANCE

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