

Monk Marshalls
64 Sunderland Rd

Our ref: RAR/gw/M115/29.09.11

29th September, 2011

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

Dear Ms Newlands,

Application Ref: CB/11/03169/OUT

(Outline) Residential development of up to 75 dwellings with access road and open space (all matters reserved except access) at Former Meller Beauty Premises, Sunderland Road, Sandy, SG19 1QY

We act as planning consultants to Marshalls Plc and are replying to your letter sent to the works manager of the Sandy site, Ms Jo Robinson,. We wish to object to the proposed housing development on land on the opposite side of Sunderland Road to the company's site. Our fundamental concern relates to the close juxtaposition of conflicting land uses namely a general industrial activity without planning restriction, and a proposed new housing site. We are in no doubt whatsoever that there will be environmental problems of noise breakout if this scheme is to go ahead.

As you know, under the current core strategy of the Local Development Framework and also the statutory development plan, being the Local Plan 2005, the former Meller Beauty Premises site is zoned as a Safeguarded Employment site. We believe this is wholly right given the undoubted industrial nature of the locality. However, we understand that the site is zoned for residential use in the emerging Site Allocations Development Plan Document. We are concerned about this proposed allocation. We do note however that there is a policy expectation both on the part of this Council and National Government to observe principles of sustainability. We believe it is entirely *unsustainable* to allow such obviously competing uses in close proximity.

We at once acknowledge that this application is an improvement on the previous outline application (Ref: CB/10/03815/OUT) which was refused on the grounds that noise mitigation measures had not been forthcoming. This

latest application is accompanied by a detailed noise assessment. We also note the provision of acoustic fencing and that the houses will have no windows to noise sensitive rooms facing towards the Marshalls site. We are nevertheless concerned that the two sites are so close that environmental noise breakout will undoubtedly occur. Windowless facades are one thing but the quiet enjoyment of garden areas is quite another.

The applicants report then attempts to put forward a series of conditions which could be imposed. Many of these conditions simply will not work, precisely because no planning controls regarding usage of the Marshalls site exist. The Marshalls site enjoys 24 hour working and this obviously includes the night-time period. Importantly, the shot blast area, which is the closest production area to the application site, also works days and nights. This is one of the noisiest activities on the site. As regards HGV movements, the northern main access to the Marshalls site is located immediately opposite the southern quarter of the proposed housing development. Night trunking is a feature of the business with wagons arriving up to midnight and then they are loaded between midnight and 0400hours before exiting the site. One of the main loading areas is at the top of the shot blast building, near to Gate 1, opposite the residential site.

We are unclear as to the locations chosen for noise monitoring in respect of the Marshalls site. Certainly Gate 1 and the shot blast building and the HGV loading area nearby, should all feature, if they have not already done so.

Presently, Marshalls in common with most manufacturing activities, is suffering from the recession and activity is therefore at a lower level than would be liked. The company naturally hopes this will not continue to be the case and will certainly look to increase levels of activity at the site in time to come. Here, we are reminded of national planning policy advice on Noise whereby PPG24 Planning and Noise (paragraph 12) makes it quite clear from the outset that new noise sensitive development should not be permitted in areas which are, or are expected to become subject to unacceptably high levels of noise. Paragraph 12 (excerpt) of PPG24 reads as follows:-

Local planning authorities should consider carefully in each case whether proposals for new noise-sensitive development would be incompatible with existing activities. Such development should not normally be permitted in areas which are - or are expected to become - subject to unacceptably high levels of noise. When determining planning applications for development which will be exposed to an existing noise source, local planning authorities should consider both the likely level of noise exposure at the time of the application and any increase that may reasonably be expected in the foreseeable future, for example at an airport. Annex 3 gives guidance on the assessment of noise from different sources. Authorities will also wish to bear in mind that, while there will be sites where noise is significantly lower at night than during the day, other sites may be subjected to night-time noise, for example from traffic, at a level which is little below the daytime level. These sites warrant particular protection: noise-sensitive development should not normally be permitted where high levels of noise will

continue throughout the night, especially during the hours when people are normally sleeping (23.00 to 07.00).

Marshalls are rightly proud of their good working practices. However, the Marshalls site and working practices do not form part of this application, nor can they. The Marshalls site operates on a 24 hour basis without restriction in land-use planning terms. The company is desirous of expansion and the site activity will hopefully increase, not decrease. PPS4 'Planning for Sustainable Economic Growth' is highly supportive of industry and employment development. Marshalls is a major local employer with over 100 staff at their Sandy site, not to mention the suppliers and spin off trade created. Most of the workforce lives within 5 miles of Sandy. Policy EC10 of PPS4 stresses the need to consider the impact on local employment. We maintain that should this housing scheme go ahead it will create a conflict of uses and activities, to the detriment of the Marshalls operation (quite apart from environmental harm caused to the residential area). We are therefore greatly concerned about the future expansion prospects and indeed the future generally, of the Marshalls site.

To conclude, if this residential outline consent is granted there will be harm caused not only to the environmental conditions of the future residents but also to the existing and future operation of a major local employer. *The two uses are simply too close for comfort.* We therefore urge that despite the technical noise and traffic reports submitted by the applicants, that this is an unsustainable plan proposal and as such should be rejected.

Yours sincerely,

RICHARD RAPER