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26 SEP 2011



Campaign to Protect Rural England

GEORGINA SHINE

Trevor Saunders,
Asst. Director of Planning,
Central Bedfordshire Council,
Priory House, Monks Walk,
Chicksands,
SHEFFORD, SG17 5TQ

21st September 2011

Dear Sir,

Application CB/11/01937/OUT - Chamberlains Barn Quarry, Leighton Buzzard, up to 950 Dwellings etc.

Application CB/11/01940/FULL - Chamberlains Barn Quarry, Leighton Buzzard, Link Road, Heath Road/Vandyke Road etc.

Application CB/11/02827/OUT - Clipstone Park Leighton Buzzard, up to 1280 Dwellings etc., with Link Road, Vandyke Road/Stanbridge Road

We have studied the submissions made in respect of the above, and write to register our objection to all 3 of these applications.

Our grounds for objection are as follows:-

1. Planning Context

1.1 The applications are associated with an emerging Core Strategy which the Secretary of State has now confirmed should be withdrawn. The proposed developments all lie in the South Bedfordshire Green Belt, but would have been facilitated by the Green Belt boundary change which that Core Strategy was proposing. However, with the withdrawal of the Core Strategy, it would seem to us that there is currently no mechanism in place by which the intended Green Belt boundary change can be formally progressed towards adoption.

1.2 We submit, therefore, that until some other planning framework and mechanism emerges whereby any change to the Green Belt boundaries East of Leighton Buzzard can be formalised, these applications have to be viewed as inappropriate development in the Green Belt, and therefore subject to the 'very special circumstances' test in PPG2.

1.3 In our view, no sufficient case of 'very special circumstances' currently exists. In this regard, we draw attention to the fact that at the present time there are very substantial tracts of allocated and consented land within the Leighton Buzzard Southern Urban Extension Area (Grovebury Farm and Brickyard

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Quarry) which have still to be developed. You are also aware that the Council's refusal of 900 homes on land West of Linslade is currently awaiting the outcome of an Appeal Inquiry. Were the Secretary of State to allow this Appeal, this would quite clearly have major impact on the case for any housing expansion to the East of the town.

2. Sustainability

We note that the applicants point to recent initiatives and announcements by the Government designed to drive up the rate of housebuilding, and that they refer in particular to the draft National Planning Policy Framework, currently the subject of consultation, which the Government proposes should contain a 'presumption' in favour of sustainable development.

However, the Government has made it quite clear that this presumption is not intended to operate in such a way as to weaken the existing level of protection given to land of Green Belt status.

In any event, the key word underlying the presumption is 'sustainable', and we consider the applicants' proposals fail significantly to meet that criterion.

To be specific:-

2.1 Traffic

The applications involve a total of 2230 dwellings and we consider that - especially after taking into account the effects of a fully built out Leighton Southern Urban Extension - proposals of this magnitude must inevitably impose significant unsustainable traffic impacts on the town. Access to the town centre, and cross-urban movement between Leighton Buzzard and Linslade, is already subject to congestion, and the latter flow will be particularly affected by additional traffic seeking access to and from the railway station. The proposed Heath Road - Vandyke Road Link, together with the proposed Eastern Link Road, alterations to road junctions and enhancements to the local bus network, will in our view offer only limited mitigation of these impacts.

Indeed, the effectiveness of the proposed new bus services will depend not just on their frequency but also on their reliability, and this - along with the reliability of the rest of bus network throughout the town - will undoubtedly be severely compromised by the raised levels of traffic and congestion which are bound to be experienced within Leighton Buzzard's urban core.

It is by no means unrealistic to envisage that the applicants' combined proposals could entail some 2500 - 3000 additional cars domiciled within the town's boundaries, and that a high proportion of these will be seeking access to the road network within similar timeframes of the day. Against this background, we submit that the conclusions of the applicants' Transport Assessments that

'there are no highway reasons why this proposal should not be permitted' (Chamberlains Barn) and that there will be a *'nil detriment impact on Leighton Buzzard'* (Clipstone Park) can command no credibility.

2.2 Employment & Economy

2.2.1 There have to be serious grounds for concern over the sustainability of the employment prospects associated with the applicants' schemes. Out of the 2230 households proposed, it is not unreasonable to envisage that in well over 1500 of them there will at least one person requiring access to employment. However, the actual number of additional local jobs that could potentially be created within the proposed new employment zones, or be available elsewhere within the town, is clearly not going to meet such a level of requirement. It is certainly well within the bounds of probability that over two-thirds of those requiring access to work will need to out-commute to other locations, placing strain both on road and rail networks and, in the case of the latter, on access to and from the town's rail station.

It is already an unsustainable feature of Leighton Buzzard and its economy that such a high proportion of its residents have to commute elsewhere to work. The scale of the applicants' proposals, relative to their employment creation potential, can only make the existing situation even more unsustainable than it is already is.

2.2.2 The town's most important visitor attraction is the Leighton Buzzard Narrow Gauge Railway, which takes people out to what is currently a pleasant area of open countryside. The applicants' proposals will largely urbanise the whole length of its countryside section bar the last 300 yards, and thus have highly damaging impacts on the attraction of the railway.

In exchange for open green countryside, we get what is described as a 'green corridor' -- albeit one which features close-up views of a new road link and residential development on its north side, and on its south side more views of residential development together with a 'Neighbourhood Centre' incorporating a supermarket and a public house. Moreover, prior to completion of the applicants' developments, the railway would face years of despoiled surroundings while the applicants' extensive schemes were under construction -- construction work which includes the diversion of the railway at one point from its historic route in order to accommodate the junction of Vandyke Road with the proposed Heath Road/Vandyke Road Link.

Not just in the long-term, but particularly through the construction phase, the applicants' proposals show scant regard for the railway's importance to local people, to visitors, and to the local economy. The impacts on the railway are highly adverse, are incapable of effective mitigation, and are therefore by definition unsustainable.

2.3 Environment

We wish to draw attention to the Sustainability Appraisal Report (November 2010) prepared in conjunction with the Core Strategy Pre-Submission document. This S.A. report comments at P.74 on the 'First Sieve' output from the S.A. methodology in relation to Sites C and D, i.e. the site areas to which the applicants' proposals relate. It then lists the mitigation measures seen as required should these sites be taken forward for development.

2.3.1 For Site C, the mitigation measures listed include the statement *'Development beyond the urban area up to the Shenley Hill Road is not considered appropriate'*. To a significant extent, the applicant's proposals ignore this important S.A. recommendation. Whilst he appears to seek partially to meet it by proposing the rising area of the land up to Shenley Hill Road be developed as a 'Country Park', the lower area flanking Vandyke Road is shown as almost entirely given over to residential development. Particularly in this respect, we submit that the application involves a major non-compliance with the Core Strategy Sustainability Appraisal.

2.3.2 For Site D, the mitigation measures recommended in the Core Strategy S.A. include the statements *'Development should avoid the sensitive slope and ridge leading up to Charity Farm'*, and *'The setting of Eggington should be safeguarded'*. The applicant's proposals appear to comply with neither of these recommendations. The alignment of the proposed Eastern Link Road appears to cut well into the base of that sensitive slope, and the general setting of Eggington village is undoubtedly adversely affected not only by the encroachment of residential development but by the proposal to site two employment zones alongside the Link Road at its southern end. One of these is even proposed to be on the east side of the Link Road, thus breaching the 'barrier' to development it otherwise affords.

These proposals would bring residential and industrial development within half a mile of the outskirts of Eggington village. We submit that, far from safeguarding the setting and environment of Eggington, the applicant's proposals involve impacts on it that are profoundly adverse, which are incapable of effective mitigation, and which are therefore unsustainable.

3. Localism

3.1 The Government's Localism Bill is expected to be on the Statute Book this November. The Bill promotes, inter alia, a planning process in which local communities will have a much greater say in the forward strategy for their areas, based on their own vision of local needs.

The 2,500 homes envisaged for the East Leighton-Linslade SSSA in the Submission Core Strategy has never been a figure based on an estimation of the town's own requirements. It is a figure which originated from the Milton Keynes

& South Midlands SRS stipulation that a total of some 25,300 additional homes should be delivered within the Luton & South Bedfordshire Growth Area over the period 2001-2021, with provision for a further 15,400 over the years to 2031, figures towards which Leighton-Linslade should make an 'appropriate contribution'. This 'appropriate contribution' became quantified at 2,500 in the Core Strategy Preferred Options document of April 2009.

3.2 Following the Government decision in May 2010 that top-down Regional targets should be abolished, and replaced by targets that reflected local need, the Core Strategy was re-worked and re-based to provide for 23,150 new homes over the period 2011-2026, with contingency provision for some 4,050 homes beyond that date. Notwithstanding the substantial reduction that this represents against the original targets, the 'contribution' to be made by the East Leighton-Linslade SSSA by 2026 has remained unaltered in the Pre-Submission Core Strategy from that originally set in the context of the old MK & SM SRS targets for 2031. This contrasts noticeably with the situation at the other two SSSAs, both of which have seen significant reductions. The reason for this appears, once again, to have little to do with Leighton-Linslade's local needs, but is because the East Leighton SSA is seen as offering the opportunity for a faster start towards delivery of the Core Strategy targets than either of the other two.


3.3 The Pre-Submission C.S. itself states at Policy CS1 that *Leighton Buzzard will be a secondary location for development that will provide development opportunities to meet the needs of the town and make a contribution to meeting the housing needs of the wider area*. Taking that statement at its face value, if the housing needs of the wider area have been marked down it clearly follows that the 'contribution' required from Leighton Buzzard should also be marked down. This has not happened, and in our submission it should have done.

3.4 In any case, the 'contribution to the wider area' approach should now be seen as at fundamental odds with that set out in the Localism Bill, which clearly points to local need as the basis on which local development should take place. Local people have spoken out strongly against development at Leighton-Linslade on the scale proposed. We submit that the principles of the Localism Bill alone – quite apart from the other arguments we have presented – now require that the concept and scale of any development to the east of the town be completely re-evaluated.

4. Conclusion

We urge your Council to give all due consideration to the representations we have made in this letter, and accordingly to refuse the present applications.

Yours sincerely,


T.H. Ashburnham

Area Representative, South Beds & Luton

