

7 April 2014

Victoria Davies  
Central Bedfordshire Council  
Priory House  
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Chicksands  
Shefford  
Bedfordshire SG17 5TQ



Dear Victoria

**EAST OF LEIGHTON LINSLADE - URBAN EXTENSION  
PLANNING APPLICATIONS CB/11/02827/OUT, CB/11/01937/OUT AND CB/11/01940/OUT**

You are aware of the objections that we have made in relation to the planning application CB/11/02827/OUT submitted by Willis Dawson Holdings. Some of our concerns could still be properly addressed in the proposed Section 106 Agreement and, as Hogan Lovells stated in their letter of 19 March 2014, our clients will continue to monitor the application and the proposed planning permission including the Section 106 Agreement.

Our concerns relate to the significant differences between the coherence of the East of Leighton Linslade Framework Plan, in particular the provision of the Essential Infrastructure. The Framework Plan states (emphasis added): *'The Essential Infrastructure that must be provided for growth to be integrated and sustainable also requires a co-ordinated programme particularly if there is more than one application covering the Framework Plan area*'. The provision of approximately 16 hectares of employment land is considered an element of the Essential Infrastructure to assist in the creation of local jobs concurrently with new housing. Considering the fragmented approach in the three separate planning applications, can you explain how the Council will ensure that the benefits of the Framework Plan are delivered?

These serious concerns also apply to the planning applications CB/11/01937/OUT and CB/11/01940/OUT submitted by Arnold White Estates which we understand the Council expects to consider shortly.

The Chamberlains Barn application (CB/11/01937/OUT) is inconsistent in its treatment of the 'Chiltern Hunt' land even though this land is, in a practical sense, an integral part of the Urban Extension which is not properly addressed in the Application. The Application Statement dated May 2011 includes the following inconsistencies which need to be addressed prior to the proper determination of the application:

1. The Chiltern Hunt Land is included in the East Leighton Linslade Strategic Allocation. This area includes approximately 16 hectares of employment land, of which the Chiltern Hunt Land provides approximately 4 hectares according to the Framework Plan dated June 2013. The Chiltern Hunt Land is therefore an important element in the comprehensive planning of the area within the Site Specific Strategic Allocation (SSSA).
2. However, at 2.10 the application dated May 2011 incorrectly states that the Chiltern Hunt land is excluded from the SSSA.

3. Can you explain how an application made in May 2011 (CB/11/01937/OUT) is consistent with a Framework Plan dated June 2013?
4. You will recall that the Council found it difficult to contact Chiltern Hunt and its advisors during the consultation on the Framework. We were of course well known to both this applicant and Willis Dawson Holdings and we were able to confirm to the Council that our clients did not oppose the Framework subject to the proper treatment of their land in relation to any planning permissions which came forward under the guidance of the Framework.
5. At present there is no agreement between our clients and Arnold White Estates although we anticipate a meeting and further discussion before the Council considers the application dated May 2011.
6. Figure 1.2 and Figure 1.3 in the statement which accompanies the application both illustrate the Chiltern Hunt land shaded in a purple colour. There is no indication in the key about what this shading represents and thus may give the impression that the land is included within the scheme.
7. Importantly, the Framework Plan shows a primary footpath passing through the middle of the Chiltern Hunt Land. The Chamberlains Barns planning application also shows the same primary footpath, implying that this footpath will be delivered by the scheme. As yet there is no agreement between the applicants and Chiltern Hunt to enable this significant link to be provided.
8. A further diagram of the Chamberlains Barn Neighbourhood at Figure 3.7 in the application statement annotates the Chiltern Hunt Land as: *'Vandyke employment area co-located with and reinforcing the neighbourhood centre'*. This plan does not include red line boundaries to show different land ownership and includes the Chiltern Hunt land in the Chamberlains Barn Neighbourhood, although the land is not actually included in the application.
9. At 3.4, the application statement reads: *'A substantial area of 3.41ha has been left as a reserve site (within an overall parcel of 5.4ha) to provide employment generating uses ideally located to both serve the existing proposed development and with direct access to the link road'*. The applicants do not however make it clear that they do not own or control the land forming the 3.41ha reserve site.

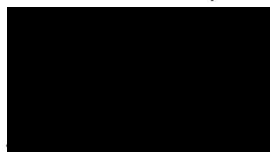
The Chamberlains Barn application and the Stearn Land application do not include any employment land. They are both therefore entirely reliant for employment uses on the Willis Dawson Holdings application at Clipstone Park or the reserve site, which is also excluded from the Application. We do not see how the Council can properly consider the application without clear contractual linkages to employment provision and the land required to achieve it.

As we have explained to the Council, our clients would be prepared to have the land included within a Section 106 Agreement so that the Employment provision and the primary footpath could be provided as is envisaged in the Framework Plan and the SSSA.

Contrary to assertions at the 28 February Committee by a representative of Arnold White Estates, we understand that the Chamberlains Barn and Stearn Land applications were not ready to be considered at the Development Management Committee on 2 April. We would therefore like to take this opportunity to resolve the outstanding matters before these applications are determined and that the application and any consents properly deliver the 'co-ordinated programme' of Essential Infrastructure including employment and footpaths.

We look forward to your confirmation that these matters are being properly addressed by the Council.

Yours sincerely



Sam Thompson