

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

16 July 2020

Dear Sir/Madam

CENTRAL BEDFORDSHIRE LOCAL PLAN – CONSULTATION ON ADDITIONAL EVIDENCE

HOUSING TECHNICAL PAPER: EXAM 113

Having looked at the above paper and annexes, I am disturbed that no additional consideration appears to have been given to the proposed inclusion of parcel HAS33 – Land North of Soulbury Road - in relation to the small and medium sites for development. I consider this lacks soundness and that there are significant issues which do not appear to have been addressed despite the strong responses to the original proposal which the Council received.

There are many reasons for this concern over the failure of the Council in its Technical Housing Assessment Report and Annexes further to examine this site and propose its exclusion from potential development sites through a Main Modification. The overwhelming local opposition, including that of Leighton-Linslade Town Council, on sound planning policy grounds to the development of this site, and the previous history of refusal of planning applications on it (with reasons stated which remain just as relevant today) are pertinent. However, I would particularly draw attention to the following at this time.

The case for removal of the land from the Green Belt to allow its development against the criteria of the NPPF is, at best, unproven on the basis of the evidence. Thus, in 2017, Green Belt analysis for the Council concluded that “the parcel has a sense of separation from both countryside and the settlement and so makes a moderate contribution to Green Belt purposes.” It was, therefore, concluded that “Site to be excluded from Local Plan process” with the reasoning that: “The site is located in the Green Belt and has not been identified as a parcel that is making only a relatively weak, weak or no contribution to the wider Green Belt. In addition to this it does not fulfil criteria to be considered for exceptional circumstances”.

However, despite this, the parcel in question was subsequently included in the draft Local Plan as submitted for development with highly contentious value judgments in support when

development of the land would both be contrary to the NPPF Green Belt criteria of safeguarding the countryside from encroachment and preventing urban sprawl. Indeed, as the Central Bedfordshire conclusion in rejecting a 2012 application to build on this parcel stated, allowing such development “would erode the openness of this Green Belt location and fail to safeguard the countryside from encroachment and hence conflicting with the purposes of including land in the Green Belt.” It was further stated: “The site being within the Green Belt, with no very special circumstances having been established such as would outweigh the harm to the Green Belt.” There have been no material changes in policy nor the environment surrounding the site since that time.

There is then the impact of any development of this site on the immediately adjacent Linslade Wood. The longest, northern boundary of parcel HAS33 runs along the edge of Linslade Wood which includes within its boundaries a nearby area of Ancient Woodland and County Wildlife Site. Indeed, the majority of the boundary of the parcel is unbuilt and with Leighton Road already providing a strong and defensible boundary against urban encroachment. Entirely apart from the damage which would result to the bio-diversity and ecology of Linslade Wood through development of the parcel, I would repeat the question I raised during the draft plan’s public examination and again ask whether there has there been any proper ecological survey of the potential impacts as required in relevant legislation, by Central Bedfordshire? It is understood that several bat species populate the woods – two species of Pipistrelle, the Noctule and the Brown Long Eared, all protected by both domestic and international legislation. Similarly, impartial advice from a bat expert at the Greensand Trust was that the rough pasture and hedgerows on site HAS 33 would provide a good foraging habitat for any bats in the area. Where is the evidence that the relevant factors and impacts have been properly investigated and assessed by the Council, as required by relevant legislation, in putting forward HAS 33 for potential future development? The absence of any such evidence would surely itself provide grounds for a challenge to the inclusion of this site.

In view of the importance of this matter to the local community, I am sending a copy of this representation to Andrew Selous MP.

Yours faithfully

Clive Palmer

Dr Clive A Palmer
Leighton-Linslade Town Councillor – Southcott Ward