



Stondon Parish Council
Stondon Community Centre
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Thomas Mead,
Planning Dept
Central Bedfordshire Council
Priory House, Monks Walk
Chicksands, Shefford SG17 5TQ

21 May 2025

Dear Thomas,

Application number: CB/25/01015/OUT
Location: Land West Of Hurricane Avenue, Lower Stondon
Proposal: **Construction of up to 115 residential dwellings, affordable housing, vehicular access off Bedford Road and Hurricane Avenue, and provision of public open space with associated landscape planting with associated infrastructure, drainage measures, earthworks and all other associated works. All matters reserved. .**

Objection by Stondon Parish Council

Stondon Parish Council strongly objects to the above planning application. To support our objection, we have commissioned Gov Resources Ltd to provide a detailed professional response, which is enclosed for your consideration.

While every effort has been made to ensure the accuracy of this submission, we encourage the Planning Authority to verify the information provided before making a decision. Stondon Parish Council cannot accept responsibility for any unintentional errors or omissions.

Yours sincerely,

James Stirling
Clerk and Responsible Financial Officer
Stondon Parish Council

Thomas Mead
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21 May 2025

Dear Tom,

Objection to Planning Application:

CB/25/01015/OUT Land West of Hurricane Avenue, Lower Stondon

Outline Application: Construction of up to 115 residential dwellings, affordable housing, vehicular access off Bedford Road and Hurricane Avenue, and provision of public open space with associated landscape planting with associated infrastructure, drainage measures, earthworks and all other associated works. All matters reserved

Introduction

- 1.1. This letter of objection has been prepared by Govresources Ltd, on behalf of Stondon Parish Council. Stondon comprises Lower Stondon and Upper Stondon.
- 1.2. Stondon Parish Council objects to this application for up to 115 homes on farmland west of Hurricane Avenue.
- 1.3. The application should be refused based on the fundamental conflict with strategic policies in the Development Plan. The site is outside the settlement envelope, in open countryside, and is part of a much larger field in agricultural use. Harm to landscape character, archaeology, ecology, and existing Rights of Way, and the loss of open countryside, have not been properly considered.
- 1.4. The application should be judged and a decision made with regard to the Central Bedfordshire Local Plan (CBLP) 2021, unless material considerations indicate otherwise, because the CBLP is currently up to date, and the Council has a 5 year land supply. The need to engage the 'tilted balance' as it is referred to, i.e. paragraph 11d of the NPPF, is not relevant in the case of this application.
- 1.5. The application should be refused.

Site and Surroundings

- 1.6. The application site, of about six and a half hectares, is outside the settlement envelope defined in the CBLP. It lies adjacent to the settlement envelope within a much larger agricultural field (of some 25 hectares), with no indication on the ground of any defensible

boundary. It appears to be a speculative development, which if approved would establish the principle of a significantly larger extension to Stondon, across to Manor Farm.

- 1.7. The Planning Statement and supporting documents grade the farmland as a mix of 3a and 3b. This matter appears to be in dispute with other sources claiming that the application site is a mix of Grade 2 and 3a. Notwithstanding, Policy DC5 of the CBLP says that a significant loss of grade 2 and 3a agricultural land must demonstrate that the location is necessary to provide a scheme that is of valuable public benefit and therefore overrides the need to protect the farmland. The Planning Statement does not provide this justification. Although the size of the loss of this agricultural land is not significant, the potential for the loss of the full 25 hectare field would constitute a significant loss.
- 1.8. The site rises from east to west and lies within National Landscape Character Area 88 (Bedfordshire & Cambridge Claylands) and Local Landscape Areas 4C Upper Ivel Clay and 8D Upper Gravenhurst – Meppershall Clay Hills. The site is characteristic of the Upper Ivel Clay Valley and so the impact of the proposed development on the landscape character area is a relevant consideration.
- 1.9. The furthest extent of development on the site would lie over 1km from the village facilities, which cluster close to the Hitchin Road/Bedford Road junction.
- 1.10. There are no national or local designations on the site but there is a statutory footpath, Public Footpath 4 running through it. A further Public Footpath (3) is just north of the site along the parish boundary. The site lies within a known landscape of extensive prehistoric and Roman archaeological activity (Archaeological Notification Area reference HER403). Both factors will be sensitive to development and should be considered in detail. They are not identified in the Planning Statement as items where potential harm could result from development.

Growth of Stondon

- 1.11. The growth of the village has been relentless. Figures provided by the Parish Council show completions/building starts between 1998 and 2024 to be 865 homes. The Council's published Annual Monitoring Report 2023/24 shows Stondon Parish Completions for five years up to the end of March 2024 as:

2019/20	2020/21	2021/22	2022/23	2023/24
90	81	93	45	126

- 1.12. In addition to this current application for 115 homes, an application for community infrastructure and habitat creation (CB/25/00292/OUT) at Mount Pleasant Golf Course is currently being considered. This application is a precursor to an application by [Bloor Homes](#) for housing which is speculated to be in the region of more than 450-500 homes in Stondon. An application has not been submitted yet for the final (most westerly) section of CBLP site allocation HAS46.
- 1.13. There are many more homes under consideration which would add to the overall impact on the area, either in Henlow or to the south east of Stondon in North Herts. The cumulative impact on the facilities, services and transport infrastructure of the immediate area of Stondon needs to be comprehensively planned though the review of the Local Plan,

currently in progress. It would be premature of this positive planning initiative to approve 115 homes on the application site.

Strategic Planning Policy

- 1.14. The application site is within a proposed area for growth in the CBLP, comprised of small towns and villages, from Ampthill to Moggerhanger, called the Central Area. Paragraphs 6.5.2 and 6.5.3 highlight the large number of recent speculative planning permissions leading to piecemeal development without the corresponding delivery of services and infrastructure. The Sustainability Appraisal and transport modelling evidence for the CBLP identify limited scope for residential growth in this area. Further unplanned development would be contrary to Policy SP1 of the CBLP.
- 1.15. Policy SP1 of the CBLP details the growth strategy for Central Bedfordshire including those sites allocated for development. The application site is not allocated for development. It may well have been submitted during the recent call for sites for the proposed new Local Plan, but this information is not publicly available and submission of a site in the call for sites does not in any way confirm that it will be taken forward as an allocation within the new Local Plan.
- 1.16. Stondon is identified in the CBLP Settlement Hierarchy as a Large Village with a defined settlement envelop. The application site is outside the settlement envelope. Policy SP7 of the CBLP list the types of development that might be permitted outside the settlement envelope, including rural housing exception schemes and dwellings for rural workers. A housing estate albeit one offering the require 30% affordable housing is not an acceptable exception to the policy.
- 1.17. The other important phrase in Policy SP7 is the recognition of the intrinsic character and beauty of the countryside beyond the settlement envelope. The character of the application site is discussed further elsewhere in this objection, but the land is actively used farmland, part of a much larger landholding, of a gently undulating nature, divided by hedgerows, and typical of the attractive rural character of the area.
- 1.18. The principle of the proposed development would be contrary to Policies SP1 and SP7 being unplanned development outside the village envelope and not on an allocated development site. The applicant in their Planning Statement considers that developing a site that is not allocated for housing and is outside the defined settlement element is a “minor conflict with Policy SP7”. This is an enormous understatement. The conflict is fundamental to two primary strategic policies in the Development Plan. The Rochdale judgement and the Corbett v Cornwall case are being misused in this context.
- 1.19. Policy SP2 of the CBLP refers to the presumption in favour of sustainable development in the NPPF and that planning decisions will take a positive approach, approving applications that accord with policies in the Local Plan, unless material considerations indicate otherwise. Stondon Parish Council can find no such material considerations that would support the approval of the application.
- 1.20. Central Bedfordshire has confirmed that they can evidence a 5 year land supply (5.05 years) with the required buffer. The CBLP is therefore up to date. If a successful challenge to the Council’s 5 year land supply was to be successful, before a decision is made on this application, it would likely be only a marginal shortfall, considering the Council’s good track record in housing delivery. The weight of a tilted balance, if applied, should be given

minimal weight and the Development Plan given significant weight. This development proposal with little to recommend it should still be refused as contrary to the Development Plan.

Layout/Masterplan

- 1.21. The visuals provided in the Design and Access Statement are an improvement from the initial concept, now providing public open space that is easily accessible for residents living outside the site and a pedestrian access to and from the development, through the public open space.
- 1.22. Although building heights will be limited to 2.5 storey homes, there is no indication that those homes on the higher parts of the site to the west will be lower than on the less visible parts of the site to the east. The site is the highest point in the parish and more attention should be paid to the impact of its visibility.
- 1.23. Although all matters are reserved in this outline planning application, reference should be made to the [2022 AECOM document: Stondon Design Guidelines and Codes](#). In particular sections 3.4 and 3.5 would provide codes and a checklist for more detailed design matters.
- 1.24. Access is also reserved, however, the masterplan and the red line boundary to which it relates does not include means of access from/to the public highway. A location plan should include all land necessary to carry out the development, (i.e. land required for access to the site from a public highway). Without an appropriate amendment to the location plan/masterplan the application should be refused.

Landscape

- 1.25. The landscape appraisal is not convincing. Landscape character on the application site and to the north has been assessed. No assessment has been made of the character area to the west of the site, which includes the landowners farm and Stondon Manor. This tends to indicate the intention that further development proposals to the west will be forthcoming.
- 1.26. Some of the measures provided to mitigate against landscape harm are not within the site boundary with no indication how new planting will be managed and maintained.
- 1.27. The site will be clearly visible from the wider countryside and particularly from Public Footpath 3 to the north. The character and nature of Footpath 4 could change entirely.
- 1.28. The applicant's conclusion about landscape harm is underestimated.

Archaeology

- 1.29. The Parish Council is concerned about the lack of regard for heritage and archaeology. The pre-app response from the Council clearly laid out requirements for an archaeological Heritage Statement including the results of the geophysical surveys and an archaeological trial trench evaluation. This information is essential to evaluate the potential harm to Iron Age and Roman archaeology on the site.
- 1.30. There is a 20th century pillbox located on the southern edge of the site, which has been identified in the Draft Stondon Neighbourhood Plan as a local heritage asset. It has also been identified in the Stondon Design Guidelines and Codes and by the Council's Archaeologist as having heritage value. It is described in the applicants Archaeology and Heritage Assessment as "of very low/local significance" and dismissed as it "would receive no more than a small level of harm through changes to its setting." This heritage asset is of

local interest and its setting should be enhanced, if this application were to be successful. Plans should indicate how the rural setting of the asset will be maintained through landscaping.

Ecology

- 1.31. The Ecology officer's comments are far from complimentary. This is an outline application seeking the principle of development on the site. The principle is contrary to the Development Plan. Very little has been done to show how the site could provide real benefits to weigh in favour of the development which is not policy compliant.

Other Comments

- 1.32. Several other comments have been raised by residents, but these are not available on the portal. Of the 113 letters sent to residents, 67 replies have been received of which 65 were against the proposed development.

Planning Balance

- 1.33. The Planning balance is very one-sided with the potential harm underestimated and the benefits overestimated.
- 1.34. Paragraph 7.10 of the Planning Statement lists the following reasons for granting planning permission:

Developer Benefit	Parish Council Comment
Delivery of 115 new homes to bolster the Council's supply	The Council has proven it has a 5 year land supply with buffers
Development will create a vibrant neighbourhood in a sustainable location	115 homes do not make a neighbourhood and there is no indication of what will create vibrancy
20m advance tree planting	The tree belt will be an environmental benefit, but is unlikely to screen the development for at least 15 years
Delivery of at least 10% BNG	This is a statutory requirement
Creation of new pedestrian and cycle links	These are only within the development and there will be harm to the character of Footpath 4
Contributions to the local economy	This benefit will be minimal and short-lived
Additional Council tax revenues	This is not a planning benefit
Increased patronage of local facilities	The site will contribute little patronage as a percentage of overall development in the local area
Provision of open space	The accessible open space (excluding the attenuation basin) is small and will offer a small benefit

- 1.35. Paragraphs 7.11 – 7.28 are irrelevant as the Council can demonstrate a 5 year housing supply and the Local Plan is up to date with a review in progress.
- 1.36. Harm to landscape character, archaeology, ecology, and existing Rights of Way, and the loss of open countryside, have not been properly considered

Summary and Conclusions

- 1.37. The applicant argues that the site is sustainably located and will support the overarching objectives of sustainable development. However, the main argument put forward by the applicant is that the approval of developments to the south of the application site (allocated site HAS46 in the CBLP), and to the east (a site located between the dog track and the site allocation) support the principle of development on this application site.
- 1.38. There is no convincing argument made by the applicant laying out the material considerations that would convince the Parish Council to support this development, which is contrary to the Development Plan.
- 1.39. Our conclusion is that in the balancing exercise is falsely bolstered by dubious benefits for the community, which count in favour of the development, whilst underestimating the potential harm that will be caused.
- 1.40. The Parish Council ask that this application be refused.