



Clerk to the Council

Mrs Sally Harrop
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Ms Gemma Davies
Planning Officer
Central Bedfordshire Council
Priory House
Monks Walk
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SG17 5TQ

12 September 2022

Email to: planning@centralbedfordshire.gov.uk

Dear Gemma

Application No: **CB/22/02653/FULL**
Location: **Knoll House, Dunstable Road, Studham, Dunstable, LU6 2QJ.**
Proposal: **Residential redevelopment, demolition of care home and erection of 8 dwellings.**

I write further to Central Bedfordshire Council's ("CBC") letter dated 8 August 2022 highlighting the above planning application.

Introduction

This reply has been subdivided into the following sections:-

- Executive Summary
- Planning History
- Planning Meeting
- Very Special Circumstances
- Conclusions

I set out the information and our feedback as follows in accordance with the agreed extension of time.

(A) Executive Summary

Studham Parish Council ("SPC") have reviewed the relevant documents and following our discussion, we cannot support at all this planning application (in respect of the proposed size/configuration). We therefore wish to formally object to planning consent being granted and firmly request that CBC's Planning Team refuse the said application.

SPC is again disappointed that the applicant and their planning consultant have not spoken to the Parish Council, nor undertaken local consultation or explained the background situation before making the planning application. We urge them to do so.

(B) Planning History

The site was subject to a recent planning application [CB/20/04426/FULL]. This planning application was registered back in December 2020 and proposed a two storey extension to the existing care home.

SPC submitted our comments to CBC by email letter dated 12 January 2021.

Our then key points were:-

- It was highlighted that the existing care home is not "fit for purpose" and that we understood the need for internal improvement and the associated extension project.
- The proposal was to create a modern, upgraded, care home facility with a small overall increase in the number of available rooms (with en-suite facilities).
- We noted that the applicant had made no informal consultation with SPC or local residents.
- The extension would be considered inappropriate development in the Green Belt and AONB unless there were "Very Special Circumstances" ("VSC") to justify the development.
- SPC were generally supportive of the proposal.
- SPC wanted the applicant to undertake local consultation.
- SPC were concerned about the waste disposal from the facility.
- SPC were concerned that there was a current issue with a heating oil leak from the site.
- SPC highlighted that the access to/from Studham Lane is poor and is awkwardly configured.

SPC were happy for CBC's Planning Team to determine the application as appropriate as we considered that the proposal might potentially provide a VSC argument in terms of community use.

Although CBC's Planning Team stated that on balance, the development was considered acceptable (subject to conditions), Ward Councillor Cllr Eddie Perry "called in" the application to DMC for four reasons:-

1. The application will have an overbearing impact.
2. The application has safety concerns.
3. The design of the proposal is not acceptable.
4. The proposal will have a negative impact on the landscape.

The DMC approved the planning application (in June 2021) subject to 18 detailed conditions, and planning consent was granted on 4 June 2021.

Since this consent was granted, SPC have had no contact at all from the applicant or their planning agent. It was therefore a surprise for us to receive the current planning application from CBC.

From reading the detailed Planning Officer's report into CB/20/04426/FULL, the Parish Council is aware that Knoll House was previously a single residential dwelling. Planning consent was granted in November 1984 for the change of use to a "retirement home" with further building extensions granted planning permission in July 1986 and November 1988 respectively.

SPC have not seen any documentation for these 1980's consents and there might be relevant information and/or conditions therein.

What is interesting about the planning history for the site is that there have been three further planning applications submitted as follows:-

SB/91/00568 – Erection of one four bedroomed dwelling.

SB/96/00777 – A further sizeable extension to Knoll House.

SB/01/01057 – Erection of a front conservatory.

Each one was refused.

Finally, we note from the internal CBC consultation and the Planning Statement (by Maple Planning & Development Limited) that the site in question does not comprise previously developed land ("PDL") as residential gardens are excluded from that definition.

(C) Planning Meeting

SPC reviewed the relevant planning application documents at its monthly meeting held on Monday, 5 September 2022.

This meeting was not attended by a representative of the applicant.

We had several members of the public present; the relevant Ward Councillors and another developer (and his planning consultant) in attendance. In addition, SPC have received written representations from several parishioners who were unable to attend the meeting who are opposed to the proposed development.

Various views were expressed at the meeting but the key points were:

- It was agreed that the existing care home building was dated and not "fit for purpose".
- It was noted that the care home is unviable at less than 40 rooms. Therefore, why make the planning application in 2020 for a building providing just 27 rooms?
- The Parish Council is not qualified to comment on the lack of funding opportunities but it was noted that the existing care home has not been offered to the market for the existing use.
- It was noted that that CBC have stated that the site is not PDL.
- Since pre-planning advice was received by the developer, it was noted the number of houses has reduced from 9 to 8 dwellings. Why?
- It was mentioned that the site is a triangular shaped surrounded by trees and adjacent to Dunstable Road. There is housing opposite (on two sides).
- This site is one of three different plots of land in the immediate area which are or have been subject to potential development.
- There was criticism of the "Transport Statement". The Parish Council and local residents consider that any large scale residential development on the site will significantly increase vehicle movements from/to Dunstable.
- The existing vehicular movements are minimal, with one/two cars parked.
- It is noted that the residents of Knoll House do not drive or have cars.

- The access along Studham Lane is very narrow (see photographs in **Appendix 1**).
- Studham Lane is a well-used pedestrian route to/from Whipsnade.
- The sloping (and curved) driveway is awkward for the care home and is not suitable for a large scale residential development.
- Could there be a separate access from Dunstable Road?
- There is a key drainage provision on the highway at this point. Significant surface water comes down Studham Lane. If the site is redeveloped with more hard standing, this will potentially increase the volume of water entering the drain.
- The site is in the Green Belt, an Area of Outstanding Natural Beauty (“AONB”) and an Area of Great Landscape Value (“AGLV”).
- The site is on a slope and any new buildings on it will be very visible from Dunstable Road, the housing opposite and from Studham Lane/adjacent field.
- One resident stated that there are bats in the area.
- The proposed “terraced” and semi-detached housing is not reflected in the existing housing mix in the area.
- A redevelopment for two, large detached houses would be more in keeping.

Cllr Eddie Perry stated that he did not support the planning application for a number of reasons.

SPC are happy to leave CBC’s Planning Team to expertly review and consider the various supporting documents such as biodiversity, ecological and arboricultural assessments.

(D) Very Special Circumstances

SPC note that no VSC have been outlined within the application.

It is noted from the Planning Officers report for the above mentioned CB/20/04426/FULL (see Paragraphs 6.4, 6.5, 6.6 and 6.7) that a recommendation for approval was given due to the “care home” use.

(E) Conclusions

These are as follows:-

Green Belt/Area of Outstanding Natural Beauty (“AONB”)

SPC considers that the proposed development is an inappropriate development in the Green Belt; AONB and AGLV. Studham and the subject site falls within the Chilterns AONB and should be treated accordingly.

The proposal will undoubtedly cause significant harm to the character and appearance of the area including AONB; AGLV and the amenity of the neighbouring properties.

Class C2 Use (Residential Institutions)

The applicant rightly states that the use of the existing building is Class C2 use (known as Residential Institutions). This use class includes residential accommodation with elements of care being provided to people in need of it, residential schools, colleges or training centres, hospitals, and nursing homes.

As far as the SPC is concerned, the land surrounding the existing care home is maintained for the benefit of the residents living at Knoll House and in our view the land should be classified as

“residential gardens” in planning context.

Previously Developed Land (PDL)

It noted that CBC consider the land subject to the planning application is not PDL and should be treated accordingly.

SPC agrees that the site is not PDL.

Planning Precedent

Any planning consent to knock down the care home and replace with 8 dwellings would create an unwanted planning precedent for Studham and for that matter elsewhere in Bedfordshire for similar proposals.

Highways/Landscape Value

SPC has concerns about access to/from the site via Studham Lane from Dunstable Road.

We attach two photographs (in Appendix 1) showing the current condition and configuration of Studham Lane. If the roadway is to be widened, there are in excess of 10 trees along the (northern) boundary which would be lost. This is not acceptable to SPC, and would change the look/feel of the area and adversely affect the landscape.

Whilst the access/exit is on the bend, the access is shared with the vehicular access to the adjacent residences, Hedgeside and Hollybush House. The road junction would need to be significantly upgraded should the site be redeveloped.

It is telling that the planning consent granted in June 2021 for CB/20/04426/FULL had a bespoke condition (No.5) relating to the access onto Dunstable Road.

Drainage

Significant surface water comes down Studham Lane into the drain located adjacent to Venture. This drain is very important to prevent Dunstable Road flooding and cannot be affected by any development plans.

This drain provision might have to improved/expanded (at a cost to the developer) as part of development and/or change of use on the land in question.

Very Special Circumstances

In accordance with the guidance contained with the revised NPPF document, due to its location within the Green Belt and AONB, the only way that the proposed development can be given planning consent is if there are relevant and valid VSC to justify the end development, which outweigh the harm and openness to the Green Belt.

There are none.

Sustainability

If Knoll House ceases to be care home (as existing), it is considered that the existing building should be modified and/or re-configured for another community use or probably returned (in use terms) back to a residential dwelling.

There is absolutely no need to redevelop the whole site.

The Parish Council consider this to be an opportunistic planning application by the applicant.

Existing Planning Consent (CB/20/04426/FULL)

As the applicant now states that the care home is not viable (even if the extension to 27 bedrooms is constructed), the existing planning consent (CB/20/04426/FULL) granted is now effectively redundant.

As above, the Parish Council is not aware that the existing care home site has been offered to the market for the existing use.

Rural Exception Site

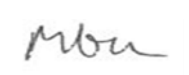
The Parish Council does not consider the site in question is an appropriate location for a rural exception site.

Summary

Taking into account all the relevant issues, the Parish Council cannot support at all this planning application and firmly considers that CBC's Planning Team should refuse any such consent.

We hope you find these comments useful to your consideration of the planning application.

Yours sincerely



Cllr Mark Poyner

Studham Parish Council
Chair of the Planning Committee

cc

Cllr Kevin Collins – Ward Councillor at CBC

Cllr Eddie Perry – Ward Councillor at CBC

Cllr Bob Wilkin - SPC

Cllr Geoff Shute – SPC

Cllr Chrys Smith – SPC

Cllr Alan Wright – SPC

Cllr Lynne Smith– SPC

Cllr Mo Rashid - SPC

Mrs Sally Harrop – Clerk of SPC

APPENDIX 1

Photographs (Studham Lane) – September 2022





Clerk to the Council

Mrs Sally Harrop
32 The Orchard
Kings Langley
Herts
WD4 8JR

Email: clerk@studhamparish.co.uk

Fenella Hackney
Planning Department
Central Bedfordshire Council
Priory House, Monks Walk
Chicksands, Shefford
Bedfordshire SG17 5TQ

6th September 2022

Email to: planning@centralbedfordshire.gov.uk

Dear Fenella

<u>Application No:</u>	CB/22/02780/FULL
<u>Location:</u>	67 HOLYWELL ROAD, STUDHAM LU6 2PA
<u>Proposal:</u>	Two storey and single storey front extensions, side and rear extensions. New roof with dormer and velux windows with rooms in the roof space.

Members of the Studham Parish Council reviewed the above application documents on Monday 5th September 2022.

Having considered this proposal, the Councillors have no material concerns.

In summary, the Councillors are happy that CBC Planning Team will determine as appropriate.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Sally Harrop'.

Sally Harrop
Clerk to Studham Parish Council



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Mrs Sally Harrop
32 The Orchard
Kings Langley
Herts
WD4 8JR

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Andy Jones – Trees & Landscape Officer
Planning Department
Central Bedfordshire Council
Priory House, Monks Walk
Chicksands, Shefford
Bedfordshire SG17 5TQ

16th August 2022

Email to: planning@centralbedfordshire.gov.uk

Dear Andy

Application No:	CB/TRE/22/00343
Location:	15 Woodland Rise, Studham, Dunstable, LU6 2PF
Proposal:	Works to a tree protected by a Tree Preservation Order 9/1992: Reduce and reshape by 25% approximately 2 to 2.5 metres off the crown to 2 Oak Trees (T1 and T2). Reduce by approximately 2 meters to Cherry Plum (T3). Reduce back over the garden by approximately 2 meters to Oak Tree (T4) which overhangs from the neighbouring garden. Cut back lateral growth over garden by 2 to 3 meters to remaining two Oak Trees (T5 and T6) and group of cherries (G1). Raise canopies to a height of 4 metres and cut back lateral growth over garden by approximately 4 to 5 meters to 3 Hornbeams (G2). Fell to ground level to Silver Birch (T7).

Members of Studham Parish Council reviewed the above application documents today. The Parish Council have no material issues with this application and are confident that it will be determined as appropriate.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Sally Harrop'.

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Clerk to Studham Parish Council



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Andy Jones – Trees & Landscape Officer
Planning Department
Central Bedfordshire Council
Priory House, Monks Walk
Chicksands, Shefford
Bedfordshire SG17 5TQ

23rd August 2022

Email to: planning@centralbedfordshire.gov.uk

Dear Andy

Application No:	CB/TCA/22/00416
Location:	6 Dunstable Road, Studham, Dunstable, LU6 2QG
Proposal:	Works to trees in a conservation area: T1 - Section fell Norway Spruce to height of Ivy approx. 2m. Reason - Close to building and causing issues for neighbours. T2 - Remove larger stems of Hazel to reduce it by approx. 50%. To keep it at a manageable size. T3 - Coppice Portuguese Laurel. It is growing from the base of the garage. To keep it at a manageable size.

Members of Studham Parish Council reviewed the above application documents today.

The Parish Council have no material issues with this application and are confident that it will be determined as appropriate.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Sally Harrop'.

Sally Harrop
Clerk to Studham Parish Council