

FAO: Mr Simon Berkeley BA MA MRTPI, Inspector
C/O: Ms Louise St John Howe
PO Box 10965
Sudbury
Suffolk CO10 3BF

9th January 2018

Dear Mr Berkeley,

This document is a joint statement based on matters raised in two separate pre-submission representations, submitted by the following households:

- Ian Harrison and Bernadette McDermott, 1 Old Ramerick Manor Cottages, Bedford Road, Ickleford SG5 3SB . Original submission date 29th November 2016.
- Garry and Holly Brankin, 1 Old Ramerick Barns, Bedford Road, Ickleford SG5 3SB. Original submission date 30th November 2016.

We have categorised our points based on the matters set out in your guidance notes. All of our points specifically relate to proposed site LS1 in the NHDC Local Plan (the “**Plan**”).

Matter 2 – Sustainable development: the settlement hierarchy (Policy SP2)

in conjunction with;

Matter 11 – The housing allocations and the settlement boundaries: the Category A Villages – Lower Stondon

The LS1 site is not within the settlement boundary of Ickleford, by way of being 3.5miles away and separated by large open rural spaces. LS1 is also not within the settlement boundaries of Lower Stondon or Henlow Camp, as those villages (the latter of which adjoins the north of the LS1 site) are located in Central Bedfordshire. National Planning Policy Framework paragraph 52 states that larger developments are best integrated into existing villages, which the LS1 site fails to achieve. The LS1 site should therefore be withdrawn from the Plan.

An important purpose of settlement boundaries is to ensure infrastructure provisions are close by and do not discriminate against the (less mobile) elderly, infirm or non-car owners. National Planning Policy Framework paragraph 38 states that key facilities should be located within walking distance of most properties. LS1 cannot achieve this in terms of facilities in Ickleford, and potential residents cannot rely on Henlow Camp or Lower Stondon facilities for schooling or healthcare as Central Bedfordshire Council is under no obligation to provide them. The Local Plan cannot assume facilities will be provided for potential sites from areas outside its own geographical scope. The LS1 site should therefore be withdrawn from the Plan.

Matter 17 – Design (including air quality) (Policies SP9, D1, D2, D3 and D4)

in conjunction with;

Matter 19 – The natural environment (Policies SP11, SP12, NE1, NE2, NE3, NE4, NE5, NE6, NE7, NE8, NE9, NE10, NE11 and NE12)

National Planning Policy Framework paragraphs 100-103 concern flood risk; the Plan states that no residential development should take place on LS1 within Flood Zones 2 or 3. National Planning Policy Framework paragraph 55 states that development in the rural area should be innovative and of high quality design. The northern part of the LS1 site adjoining Henlow Camp and Lower Stondon is located within Flood Zones 2 and 3. As a consequence, the proposed development can never successfully integrate into the existing settlement and will always appear as an isolated development, divorced from Lower Stondon by a swathe of open space and the stream along the northern boundary. The LS1 site should therefore be withdrawn from the Plan.

Matter 20 – The historic environment (Policies SP13, HE1, HE2, HE3 and HE4)

National Planning Policy Framework paragraphs 129, 131-136 are relevant when considering the heritage assets to the east of the LS1 site: the Grade II* listed Old Ramerick Manor and the newly converted Old Ramerick Barns #1 and #2, historically part of the Manor's curtilage listing and now classified as non-designated heritage assets. It is noted that Historic England has previously advised that the allocation of this site would "*cause considerable harm to the significance of the listed building*".

Your attention is drawn to the recent case of *Steer vs SoS for Communities and Local Government and Ors* ([2017] EWHC 1456 (Admin)). This is a decision made by the High Court in July 2017 that considers the interpretation of 'setting'. The case resulted in the Inspectors appeal decision being quashed.

In brief, Mrs Justice Lang concludes that the Inspector's narrow interpretation of the setting of the listed building, being limited to physical or visual connections going beyond the social and economic function of the building and estate, was contrary to the National Planning Policy Framework's definition of setting, which states:

"Setting of a heritage asset

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral."

In Lang J's opinion, the term "*surroundings*", whilst placing a geographical limitation on what can be perceived as the setting of the heritage asset, does not limit its interpretation to that which has a physical or visual connection with it. She makes specific reference to the Historic England 'Good Practice Advice' and the "*staged approach to decision-taking*". Step 1 of this guidance requires a planner to identify which heritage assets and their settings are affected.

Having regard to the thrust of this High Court decision, it is contended that the entire agricultural field upon which the proposed development is sited forms part of the setting of Old Ramerick Manor.

Old Ramerick Manor was once the farmhouse associated with the surrounding agricultural land, along with the adjacent farm buildings. It was the hub of the farming enterprise and along with adjacent agricultural land formed part of the estate and its economic and social function. Whilst the ownership of the property has evolved, the physical setting fundamentally remains the same: a former farmhouse, and associated farm buildings, all surrounded by agricultural land. Whilst there may no longer be a social and economic connection between the farmhouse and the land around it, the historic relationship is still evident.

Given the historic relationship between the land and Old Ramerick Manor, the LS1 site forms part of the setting of this Grade II* listed building.

It must be born in mind that Grade II* listed buildings equate to only 5.8% of UK listed buildings. Any impact therefore must be carefully considered, quantified and justified. To undertake development of the scale suggested in the Plan (120 homes) *within*, not adjacent to, the setting of this Grade II* listed building, would degrade the setting of the heritage asset irreparably, such that the significance would be so great that no development should be permitted on this land. The LS1 site should therefore be withdrawn from the Plan.

Matter 17 – Design (including air quality) (Policies SP9, D1, D2, D3 and D4)

in conjunction with;

Matter 20 – The historic environment (Policies SP13, HE1, HE2, HE3 and HE4)

National Planning Policy Framework paragraph 17 states that planning should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. With regards to this policy, and specifically referencing policy D3 in the Plan (protecting living conditions), LS1 is unsound as it would have a significant detrimental impact on Old Ramerick Barns, which are recently converted barns located immediately adjacent to the site boundary to the east. Topographically, these barns are sited at ~1.5m lower than the eastern boundary of the LS1 site, and ~4m lower than the western boundary. Therefore, these properties would be directly overlooked by any development on the LS1 site, destroying the outlook from what are, as previously mentioned, non-designated heritage assets.

These barns required Listed Building Consent to be developed in 2014 and, as such, it was a requirement to maintain the existing barn openings by included large glass doorways in the locations of the old barn doors, which directly face the proposed LS1 site. As such, no development of site LS1 can take place without contravening both National Planning Policy Framework paragraph 135, as referenced above, and National Planning Policy Framework paragraph 17. The LS1 site should therefore be withdrawn from the Plan.

Matter 16 – Transport and infrastructure (Policies SP6, SP7, T1 and T2)

National Planning Policy Framework paragraphs 34 and 35 refer to the need for plans to ensure that developments minimize travel needs and promote sustainable modes of transport. This ties in with policy SP13 in the Plan, specifically requiring development to enable sustainable journeys to be made to key services and facilities. These objectives are virtually impossible to deliver on the LS1 site.

Ickleford, Lower Stondon and Henlow Camp are settlements targeted for large scale residential development within the coming years. Most important in this regard is the RAF announcement in 2016 to close RAF Henlow and re-developed the site. The emerging Central Bedfordshire Local Plan identifies the re-development of RAF Henlow as one of the key areas for growth within their Strategic Spatial Strategy. Emerging Policy SP1 makes it clear that any development that prejudices the delivery of RAF Henlow will be refused. The local road network, particularly at key junctions both towards Hitchin, via Ickleford, and within Lower Stondon towards the A507, are at full capacity. The delivery of this site could significantly undermine the delivery of RAF Henlow, thus prejudicing the re-development of previously-developed brown field land over the loss of a green field site. The LS1 site should therefore be withdrawn from the Plan.

Yours sincerely,

Mr Garry and Mrs Holly Brankin
Mr Ian Harrison and Mrs Bernadette McDermott