

# Husborne Crawley Parish Council objections to Central Bedfordshire Council Local plan 2035 further consultation

August 2020

Marston Gate Expansion: Policy SE2

1. Despite the very clear concerns from the Inspectors, Policy SE2, remains as an allocated site to build a warehouse and distribution centre. It is situated principally in the Parish of Ridgmont, but it is also partly in the parishes of Brogborough, Husborne Crawley, Aspley Guise and Lidlington. All five parishes are affected by this proposal in that the site is located in the heart of the nationally important Greensand Ridge country, the setting for numerous heritage assets with numerous public rights of way, notably the Greensand Ridge itself and the John Bunyan Trail.
2. The overall area of the land to be occupied by warehousing, and distribution centre is 35 hectares, equivalent to about 80 football pitches. The site will be four times larger than the existing Marston Gate and will operate 24x7. The height of the buildings will be 18.5 – 21m high, with all the incumbent light and noise pollution.
3. The current Marston Gate Industrial Park was built on the site of the old brickworks, designated as brownfield. The allocation Policy SE2 will necessitate building on open land adjacent to the Greensand Ridge public footpaths and the John Bunyan Trail footpath will actually cross the site; south of the railway line has always been regarded as the buffer of protecting urban sprawl into countryside and should be retained as such.
4. This policy if adopted would allow the expansion of the Marston Gate distribution park onto a new site to the east of the existing complex – further away from Junction 13, on the other side of the Bletchley-to-Bedford railway line, and into open countryside.
5. For years this area of countryside east of the Bletchley-to-Bedford line has been recognised for the quality of its landscape, forming part of the unspoiled setting of the Greensand Ridge as it crosses Central Bedfordshire from Leighton Buzzard to Sandy. This land also provides the setting for the nearby medieval ringwork fortifications at Brogborough Park Farm, a designated Scheduled Monument; three conservation areas at Ridgmont, Husborne Crawley and Aspley Guise; Grade II\* listed structures and Scheduled Monuments.

## **Landscape Impact**

The Inspectors' key concerns regarding Landscape have not been overcome:

- This application proposes the development of a large complex of storage buildings and associated infrastructure on open land to the north of the M1 motorway adjacent to the existing Marston Gate industrial site. This would bring large scale building into an area of open countryside not previously developed

- Due to the topography of the site, it's prominence and the size and type of development proposed, the allocation would still have a significant visual impact from the surrounding network of public footpaths;
- Situated on rising ground at the foot of the Greensand Ridge its appearance would still be harmful to one of the defining landscape characteristics of the area
- Given the size of buildings proposed, the visual impact of the allocation would not be mitigated by additional landscaping
- The location of the site at the foot of the Greensand Ridge will remain prominent when viewed from parts of the John Bunyan Trail and Greensand Ridge Walk

None of the following key objectives have been used to test the landscape and visual attributes of the site in the either EXAM 112 or Exam 115.

- Maintenance of productive clayland arable farmland and its hedgerow pattern;
- Protection of the long and panoramic views to and from the Greensand Ridge over the vale;
- Protection and enhancement of the public enjoyment and recreational use of the vale and Greensand Ridge;
- Promotion and delivery of the Forest of Marston in this area;
- Avoidance of further fragmentation of the landscape;
- Protection of views to landmark features such as St James Church spire;
- Reduction in the impact of highway and other infrastructure on the views and landscape;
- Avoidance of development at the base of the Ridge;
- Promotion and delivery of the Greensand Country Landscape Partnership projects and objectives in this area.

## **Heritage Impact**

The key concerns of Historic England have not been overcome and their in principle objection to SE2 remains:

- This allocation of Prologis Park Marston Gate II which would expand the existing logistics park to provide up to 166,000 square metres of B8 accommodation and associated uses, parking and access roads. The site lies in a shallow valley to the east of the main railway line and to the north of the M1 motorway. The size of the site and the number and scale of the warehouse buildings proposed mean the development has the potential to affect the setting and significance of a number of designated heritage assets in the surrounding area.
- It would increase the visual impact on the setting of several designated heritage assets at Brogborough, Ridgmont, Husborne Crawley and Aspley Guise. This would result in harm to the historic significance of these designated heritage assets in terms of the National Planning Policy Framework.
- Husborne Crawley comprises of two conservation areas. The oldest part of the village around the Church of St. James at Church End lies on higher

ground to the north. The conservation area appraisal for Church End notes its location at the eastern end of a greensand outcrop in a rural agricultural setting. It highlights the extensive views to the north and east and in particular those from the churchyard. It contains a fine group comprising the church, adjacent manor and nearby Crawley Park House. The church dates from the thirteenth century but was extensively remodelled in the early twentieth century. Like many historic churches it is prominently sited, reflecting the importance of the building to the community.

- The eastern part of the Husborne Crawley conservation area consists of a linear settlement along the boundary wall of Woburn park with a succession of terraced model cottages built in the 1850s by the Bedford Estate and the village school at the northern end. The area is flanked by the trees behind the estate wall on its eastern side and open fields on the west and north and there are some views out of the village to the north east from School Lane towards the application site
- The proposed development sits just north of the Husborne Crawley Church End conservation area. This shows that while the motorway and existing Marston Gate development is visible from here the scale of the proposed new building would further erode the landscape setting of the village. The parish church sits on higher ground and the churchyard to the east of the building opens out to provide expansive views across the countryside to the north east.
- Views from Husborne Crawley church include the motorway and existing development but otherwise comprise rural fields with the church at Ridgmont acting as a corresponding landmark to the east. The proposed development would extend the area of modern industrial building into this landscape compounding the visual impact on the setting.
- At the eastern part of the Church End conservation area, beside the historic core of the village the proposed development would extend large scale industrial development across part of the landscape, eroding the rural character of the countryside.
- The eastern part of the Husborne Crawley conservation area includes the village school and the White Horse public house, important parts of the estate village, along with characteristic estate cottages at its northern end. School Lane from the conservation area boundary the proposed development would appear as a large, elongated built mass above the distant trees, extending development of a form and scale alien to the rural setting of the conservation area. This would detract from an appreciation of this setting and the contribution it makes to the significance of the conservation -area.

### **Light and Noise Pollution**

- In areas where the existing industrial development and M1 motorway are visible the proposed development would significantly increase the impact of large scale industrial building on the rural landscape including the intensification of noise and artificial lighting associated with it. This effect would degrade the setting of the Brogborough ringwork, Aspley Guise, Ridgmont and Husborne Crawley conservation areas

- The warehousing and distribution centre is 4x larger than the existing Marston Gate and will operate 24-7
- While the night-time visual impact is already compromised by the motorway and existing industrial park, the expansion of Marston Gate would significantly increase light pollution and increase its visual presence in the dark landscape. Interactive Maps of Light Pollution and Dark Skies has shown that Prologis Marston Gate is the highest ranking, which is >32 NanoWatts/cm<sup>2</sup>/sr, which is the brightest on the scale.
- No reference to the impact of light and noise pollution is contained within any of the additional SA documents produced by Central Bedfordshire which addresses these issues. It remains that there is little confidence that the impact of noise and light pollution can be sustainably managed to be sure this allocation is sound

### **M1 Junction 13 is defined as a traffic 'hotspot'**

- At the Examination last summer, the Planning Inspectors identified substantive issues with the soundness of the Local Plan, and in particular the cumulative effects on M1 Junction 13 from the proposal for 5,000 homes in the Marston Vale, Policy SE2 Expansion of Marston Gate, the expansion of Milton Keynes and Bedford along the A421 and Covanta. They subsequently asked CBC to review the assessment of the cumulative impact of traffic on local roads; and establish whether effective mitigation of traffic congestion at M1 Junction 13 is actually feasible. Currently, CBC and Highways England have reached a statement of Common Ground, however it remains uncertain that the modelling solutions put forward will overcome the cumulative effects of increased traffic at Junction 13.
- Exam 114 concludes that the increase in traffic can be sustainably managed via mitigation to Junction 13 of the MI and by the committed dualling of the westward link of the A421. But there are substantial increases in traffic on other routes particularly A507, which will be further affected by increased traffic from SE2. These are not visible in the strategic modelling within the submitted Local Plan or addressed by Exam 114.
- The development of the site would worsen congestion on the A507. The Marston Gate allocation site would be accessed from the A507, a key east-west route across the district. The council already expects the A507 to experience 'high levels of congestion' by 2035, even without the allocation; and although the council is undertaking a study of the A507 to identify ways that the congestion problems can be alleviated, no modelling or potential solutions have been devised as of yet to address them
- There is nothing apparent which would provide confidence that this development could demonstrate those levels of modal shift from cars and onto public transport, cycling or walking. Bus services are infrequent and cycles lane to Ridgmont would require access to land which neither the

developer nor the Council control. The existing train service – does not go to where people travel to work (with the exception of Bedford) and at one train an hour in each direction does not support daily commuting involving connections at Bedford and Bletchley. That new train service of East West rail will not be an electrified line and will only increase the service to 2 services an hour beginning at 6pm in the morning until 10pm at night, which will not suit shift patterns of working.

- Even if some meaningful modal shift could be achieved, there would still be significant increased traffic using local roads to access other routes and destinations.

### **Proposed mitigation Exam 106**

The Council believes that the proposed changes in EXAM106 (to reduce the visual impact) are sufficient to resolve the Inspectors' deep concerns, but Husborne Crawley Parish Council suggest that this is not the case.

- It is proposed to reduce the maximum height of the buildings by 3m to 18.5m, however the buildings will be built on raised platform levels, the levels of which have not been changed. The proposed buildings will therefore be placed on higher ground than those on the existing Marston Gate, resulting in a further increase in height above the existing Marston Gate.
- The extent of the proposed buildings has not changed. Therefore, despite the reduction in the height, there is little change in the mass and scale of the development, and it will still appear as substantially higher than the existing Marston Gate.
- EXAM106 suggests that the multi-barrelled roof is additional mitigation. However, this was proposed in the Design and Access Statement by Prologis in November 2018, therefore there is no change.
- A development of this mass and scale cannot be satisfactorily mitigated through the proposed colour palette. The development will be visible from viewpoints and also from higher viewpoints where the roofs will be most prominent. It will also be visible against the hillside and the sky.
- There are no changes proposed to the on-site planting or the land modelling, on which it will be planted.

## **Conclusion**

The Inspectors' key concerns have not been overcome and have not been demonstrated in either EXAM 112 or EXAM 115.

Furthermore, Central Bedfordshire has relied on Exam 106 the site promoter's evidence, which is not independent or objective.

We contend that Policy SE2 is not justified due to the harm that would be caused to the landscape character of the area and the setting of important and historical heritage assets.

Husborne Crawley Parish Council respectfully requests that this letter is passed to the Inspector and it should be noted that the Parish Council wishes to speak at the further Hearing sessions.