

Chalton Parish Council  
c/o The Haven  
The Lane,  
Chalton,  
Luton LU4 9UE

6<sup>th</sup> August 2020

Central Bedfordshire Council  
Priory House  
Monks Walk  
Chicksands  
Shefford  
Bedfordshire  
SG17 5TQ

For the Attention of the Draft Plan Inspectors

Dear Sirs,

**Re Central Bedfordshire Council Draft Plan Submission – Sundon Rail Freight Interchange.**

Chalton Parish Council (CPC) have reviewed the further information submitted with the Draft Plan and with regard to the Sundon Rail Freight Interchange (RFI) wish to express their opposition to this Plan.

In their response to the supporting documentation first submitted with the Draft Plan the Inspectors commented in EXAM69 that the Government attaches great importance to the Green Belt (GB) the fundamental aim of which is to prevent urban sprawl by keeping land permanently open and once established the GB boundaries should only be altered in exceptional circumstances. They expressed their concern about the absence of robust evidence to justify the exceptional circumstances necessary to alter the Green Belt boundary at Sundon.

In their reply CBC have sought to justify that their approach is consistent with the National Planning Policy Framework (NPPF) for promoting sustainable transport, including large scale facilities such as Rail Freight Interchanges (RFI's). CBC have additionally supplied a report (EXAM 107 and 107A) titled "Sundon Rail Freight Interchange Alternative Site Assessment" prepared by Litchfields. We understand that this report was bought and paid for by the developer Prologis. Accordingly it presents a view which is only in favour of this development.

Regrettably CBC have in their attempt to justify the Sundon RFI ignored the many negative aspects of this development and have not considered its impact on Chalton village, Chalton Parish and indeed the surrounding area.

## RAIL FREIGHT INTERCHANGE

CBC in EXAM 112 Employment Technical Paper section 6.3.3 report that the NPPF requires strategies for the provision of viable infrastructure necessary to support sustainable development, including large scale facilities such as RFI's.

The Sundon RFI which due to its small scale would not be classed as a strategic site should be seen not as a standalone site, but in the wider context of its location and contribution to the strategic rail network. There are within a radius of 40 miles three much larger strategic RFI's which are currently being constructed, or for which Planning permission has now been granted. They are

1. Northampton Gateway. Located by M1 Junction 15, 32 miles to the North. This facility of 46.8Ha will accept 16 freight trains per day.
2. Daventry International. Located by M1 junction 18, 40 miles to the North. This facility of 174Ha will accept 32 freight trains per day.
3. Radlett. Located close to the M1 and M25 motorways 25 miles to the South. This facility of 30Ha will accept 12/14 freight trains per day.

The Radlett strategic RFI will attach to the Midland Main Line as would the Sundon RFI.

By comparison the developer has said that the proposed Sundon RFI could accept 4 freight trains per day. The Sundon site is also constrained by the surrounding hills and cannot in the future be expanded, in comparison to the other sites which we understand have scope for expansion, a requirement of the National Policy Statement for National Networks 2014 (NPS).

The Northampton and Radlett RFI's are both reported as being capable of supplying the Milton Keynes and London areas and by inference are ideally located, as well as having the size and scale to economically supply the Luton / Dunstable area.

CBC has throughout their submission amplified what they regard as the benefits of Sundon as an RFI. Without the RFI the Sundon site becomes just another warehouse development which on its own could not outweigh the environmental policies and the necessity to show the very special circumstances necessary for the construction of such developments in the Green Belt.

We are concerned that should the Draft Plan allow this development any developer will find it financially expedient to construct the warehousing before going to the expense of building the RFI. Such a developer could then not unreasonably suggest that the other nearby larger strategic sites being more economic to operate render the Sundon RFI uneconomic to build.

The NPS reports that we quote *"The increasing performance and efficiency required of our logistics system would not allow reliance on an expanded network of smaller terminals. While there is a place for local terminals, these cannot provide the scale economies, operating efficiencies and benefits of the related business facilities and linkages offered by SRFI's."* In this respect the Sundon RFI site must be considered in its close proximity to three larger and better connected strategic RFI's.

The Radlett and Sundon RFI's would together be serviced by some 16/18 freight trains per day from the four line Midland Mainline Railway (MMR). As many local residents know this is a major commuter line into London and the South Coast. There are four commuter trains per hour using the two slow tracks between 05:00 and 21:00 hours and two or three trains per hour through the night in each direction. In addition to these commuter trains there are long distance passenger trains which utilise the two fast tracks and which stop only at main stations. Some long distance freight principally ballast, bulk cement and heavy fuel oil is also carried on these lines.

The control and transfer of a 775m long freight train into and out of two separate and independent sidings some 36 times per day will take time, with the likelihood of considerable interference and disruption to the passenger traffic. There will therefore be a preference for such movements to take place in the evenings and early hours of the morning, the noise of which will be clearly heard in Chalton village.

The potential for passenger numbers having to be reduced in order to accommodate this rail freight traffic cannot be ignored. The uncertainty as to whether the current timetable could be altered to accommodate the 16/18 daily freight trains which would run on the MMR must be considered.

The Secretary of State in his reasons for the refusal of the second Howbury appeal gave significant weight to this and also pointed out that overall this would conflict with the aims of a number of Development Plan policies that seek to minimize any adverse impact on the wider transport network and safeguard or improve public transport services. We believe this is particularly relevant as the NPS reports that there will be a considerable growth in passenger traffic in the next 10 years which demonstrates the scale of pressure facing the rail network. We understand that at times there are already passengers in excess of capacity on these lines.

#### EFFECT ON LOCAL ROADS AND AIR QUALITY

EXAM 112 section 6.5.5 highlights the decongestion of the roads as a particular benefit. Unfortunately CBC does not mention the 6,400 vehicles that the developer has said will access the Sundon RFI site each day.

Although CBC have not specifically mentioned the considerable increase and unacceptable impact of the air pollution that will result from this increase in traffic they have identified this land as having individual attributes which reduces its appropriateness to meet this demand. We quote EXAM 112 6.2.11

*“Land East of Junction 11A & North of the Vauxhall Plant is identified within the SA as having significant negative effects in relation to the Green Belt as well as in relation to SA Objective 6 in that development could intensify air quality issues at the AQMA on the M1 at Luton. The SA also identified that development would impact upon the identity of a nearby hamlet which is part of Chalton. Overall, the SA identified that this was one of the sites that performed least well”*

In the second Howbury appeal the Secretary of State agreed that substantial harm to the GB would carry significant weight against the scheme. He also agreed that where there is adverse impact to the landscape and also adverse visual impact that these would also attribute significant harm to the scheme.

As we have already mentioned it is important that the Sundon RFI is considered not in isolation but examined in its contextual relationship to other facilities in the surrounding area. There are in the immediate (within 2Km) area the following warehouses, all of which are within the Chalton Parish boundary.

1. Vauxhall (Spare Parts) 90,000m<sup>2</sup>
2. Panattoni Park, two warehouses, one currently not let 35,000m<sup>2</sup> and one 5,000m<sup>2</sup> (electrical parts supplier)
3. Lidl Supermarkets 120,000m<sup>2</sup>, Planning permission granted, construction planned to begin in 2021. When operating, this warehouse will be accessed by 625 lorries each day and employ some 700 people.

There are in addition two adjacent industrial areas which lie just within the Luton Town boundary.

1. Camford Way, approximately 38Ha
2. A smaller Toddington Road industrial area, approximately 12Ha.

The addition of the 45 Ha Sundon RFI warehousing (if permitted) will result in the creation of a 120Ha warehousing / industrial area.

We have not included the further 20Ha which will be released for development when the M1-A6 link road is completed, nor the large and currently empty warehouse located by the Thorn Turn on the A5.

All the traffic from this large area of warehousing and industry together with the increase from the proposed A6 link road will access the M1 Motorway via Junction 11A.

As far as we are aware no local transport model has been prepared which will show not only the impact of the Sundon RFI, but as we have detailed above, the significant number of other projects which will shortly come on line or are planned. Without this analysis there remains considerable uncertainty about the impact of the traffic produced by these projects.

Although it has been in operation for only a few years, junction M1 11A, due to its poor accident record and design configuration requires significant revision to cope with the substantial increase in traffic that will access the M1 following the completion of the A6 link road. Added to this will be the 6,400 vehicles per day from the RFI warehousing, should the Green Belt boundary be allowed to change. There will be a further estimated 2,000 vehicles per day from the already permitted developments leading to an additional 8,400 vehicles per day accessing junction 11A and or using local roads.

The changes to this junction are only verbally described by CBC. There are unfortunately at this stage no published drawings which would allow a visual judgement of the magnitude and scale of the upgrading which is required.

Whilst CBC in EXAM 6.3.9 highlight the positive of taking freight traffic off the roads, they fail to either mention, consider or prepare for the negative effects of the substantial increase in traffic this will bring into this already congested area.

CBC highlight the savings in pollution resulting from four rail freight trains but avoid mentioning the resultant significant increase in local air pollution which is misleading.

We believe there have been no comprehensive studies on the increased air pollution and detrimental effect on the health of the local community that will result from the introduction of so much additional traffic into a local area and onto a single motorway junction. It is therefore difficult to see how this development meets objective 5 of improving the health and wellbeing of communities. It can be foreseen given the projected increase in the volume of traffic and consequent significant increase in air pollution that the effect will not be positive but negative.

#### LOSS OF AND DAMAGE TO THE GREEN BELT

As the Inspectors have pointed out exceptional circumstances must be demonstrated before a GB boundary is changed and or land is released from the GB. CBC has attempted to show that these circumstances exist by amplifying the benefits of the Sundon RFI element and by minimising the negative effects on the surrounding GB.

CBC has in regard to the GB made several claims which we find difficult to comprehend.

In EXAM 112 6.3.8 they claim that as the site is we quote

*“The site is also identified as being within, or in close proximity to, areas of the strategic green infrastructure network, therefore supporting improved links to the strategic green infrastructure network which could provide employees at the sites with access to open space and recreational areas. This is considered to be a significant positive effect.”*

In EXAM 112 6.3.22 they claim that the site in general terms occupies a visually contained context with land form variations and nearby woodland and mature planting that in visual terms has the capacity to assimilate a well framed design.

CBC comment in EXAM 112 6.3.24 that whilst the site is in close proximity to a SSSI site an area of Priority Habitat and a Country Wildlife Site (CWS) there is the potential for minor negative effects. They continue we quote,

*“However, the SA also identifies that the employment area has the potential to provide enhancements to the local biodiversity through the creation of new areas of habitat as well as ecological corridors which could be used to link isolated areas of Priority Habitat to the south and east, with benefits for local wildlife movement.”*

CBC together with Luton Borough Council prepared a joint GB study in 2016/7. In the study Plan Fig 3.1 Stage 1 Assessment of Central Bedfordshire Green Belt – Parcels and Broad Areas shows that parcels HR1/2 and L1/2 which run from the A5 to the North Hertfordshire

border form a green corridor which separates Dunstable, Houghton Regis and Luton from areas A and B to the North where there is permitted urban extension in the GB.

The Sundon RFI and 45Ha of warehousing would cut into this green corridor practically separating it into two unconnected blocks, destroying the integrity of its essential continuity. It is therefore difficult to see how a vast 45Ha block of warehousing can provide any of the benefits which have been claimed by CBC.

The GB as shown in the drawing follows the distinctive chalk hills and escarpment which provide viewpoints from which the landscape can be appreciated. The GB study assesses these areas as having strong contributions in checking the unrestricted sprawl of large built up areas and in safeguarding the countryside from encroachment.

Visual appearance is a key factor and CBC make the claim that as the area in which the proposed development will be built is both generally flat and as it is well screened it will be mostly hidden.

Again the facts do not support this claim. An Ordnance Survey map shows that the profile of this area rises from 105m by the M1 in the West to 125m in the East where it meets the old quarry boundary and to 135m in the South as it rises to meet the Sundon Road.

The screening mentioned by both CBC and Litchfields is an 850m long avenue of some 320 mature Poplar trees. Regrettably the indicative drawings all show that this magnificent and impressive avenue would be cut down in order to provide space for warehousing.

Whilst some trees would remain they would offer only partial screening and both the RFI and warehousing will be clearly seen from Chalton. Floodlighting, noise and fumes from the development will be both seen, heard and carried to Chalton where they will have a significant adverse affect.

The development is of such a scale and in a position where it would be seen from a considerable distance. It will be seen from Toddington and also from the surrounding areas where it will interrupt and visually adversely affect the continuation of the GB.

CBC has ignored the Chiltern Way which passes directly through the centre of this development. This long distance walking path designed by the Chiltern Society follows a route to highlight the ANOB's and the best features of this historic landscape. Should the development be allowed the path will require a major diversion from the chalk escarpment which it follows in this area.

The planned warehousing boundary will be directly contiguous with the disused Sundon quarry and whilst this site suffers to some degree from the attention of off road bikers it is nevertheless a SSSI and carries the protection that offers.

There is significant ecological content in this large complex of disused chalk pits which support a mosaic of habitats including chalk grassland, chalk springs, lakes and developing woodland.

It is the home to sixteen breeding species of dragon and damsel fly, the protected Great Crested Newt, and twenty four species of butterfly. It is also home to rare species of plant and is suspected to have the largest national colony of the rare Chiltern Gentian.

There has been no statement on biodiversity and geological conservation as required by the NPS. It can be clearly seen that noise, vibration, area lighting and air born pollutants emanating from the warehousing will have a considerable adverse affect on this valuable nature reserve.

There is a presumption in the NPPF that land in the GB should not be used for development and that other sources of land should be sought wherever possible. Where development is planned it must be shown that very special circumstances exist. Whilst the Government support strategic RFI's they recognise that the smaller RFI's such as that proposed for Sundon cannot economically meet the demand. As the Sundon site does not meet the criteria for a strategic RFI it does not in our opinion meet the criteria to justify very special circumstance.

#### EFFECT ON WATER RESOURCES

The NPS states that Government Policies make clear that the Planning system should contribute to and enhance the natural and local environment by amongst other things preventing both new and existing development from contributing to, or being put at unacceptable risk from, or being adversely affected by water pollution.

The chalk underlying this section of the GB is a valuable source of underground water which is being increasingly utilised. Anglian Water report that 50% of our water comes from underground sources. The NPS recognises that infrastructure development can have adverse effects on the water environment including ground water particularly form the risk of spills and leaks of pollutants. These effects could lead to adverse impacts on health or on protected species and habitats with the resulting failure in surface waters and ground waters failing to meet environmental objectives.

There has been no study on the potential of this development to adversely affect the nearby source of the river Flit.

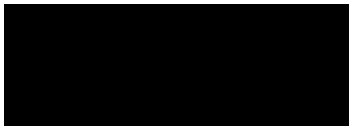
#### CONCLUSION

There are contradictions in assessments put forward by CBC. On one hand they say that the Sundon RFI will reduce pollution and not affect the GB whilst on the other hand in EXAM 6.2.11 they say that the SA has identified this area as performing least well due to its significant effect on the GB. They additionally reported that it could also intensify air quality issues and the impact on the local community. Chalton Parish Council considers that these factors provide such significant adverse weight against the Sundon RFI that the development should not be allowed.

CBC has in our opinion not shown that broadly similar benefits could be obtained from alternative non GB sites.

We trust that the information we have provided will allow the Inspectors to fully assess the impact and damage which the Sundon RFI would cause not only to our community but also the surrounding area.

Yours faithfully,



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