

RIDGMONT PARISH COUNCIL
CENTRAL BEDFORDSHIRE COUNCIL LOCAL PLAN 2035
MARSTON GATE EXPANSION: POLICY SE2

FURTHER COMMENTS ON LANDSCAPE AND VISUAL EFFECTS OF POLICY SE2

RE: EXAM 115 UPDATED SA 2020, EXAM 112 EMPLOYMENT TECHNICAL PAPER 2020 AND EXAM 106 SCHEME COMPARISON 2020

1. Introduction

- 1.1 This Statement is prepared by Bettina Kirkham DipTP BLD CMLI, former Director of Kirkham Landscape Planning Ltd, on behalf of Ridgmont Parish Council in support of their objections to the proposed allocation of site SE2 as a strategic employment site and their request to change the Plan to omit the allocation of strategic employment site SE2. Its purpose is to summarise the landscape and visual objections to the allocation in response to the updated submissions by the Council and their consultants, listed below.
- 1.2 Full assessments of the landscape and visual effects of the proposed strategic site allocation SE2, and the specific Prologis planning application for the site (CB/18/04600/OUT), are included in KLPL's reports dated 21 February 2018 and 15 February 2019 respectively and have already been submitted. My comments to the Hearing in June 2019 also remain valid. These are attached in Appendix A to this report.
- 1.3 I refer to the following documents:
- EXAM 115 updated SA 2020 (LUC)
 - EXAM 112 employment technical paper 2020 (LUC)
 - EXAM 106 scheme comparison (BCA)

2. EXAM 69

- 2.1 The Inspectors set out their concerns regarding SE2 in landscape and visual terms under paragraphs 12/13 and 49/53. It can be seen that the adverse landscape and visual effects were a main reason for concern, in that there were severe discrepancies in the Council's supporting landscape evidence and in the effects of the development.
- 2.2 The Inspectors highlighted key concerns regarding the nature of the development:
- *The prominence, size and type of development;* and
 - *Its appearance.*
- 2.3 The key concerns regarding the effects were:

- The location of the site at the foot of the Greensand Ridge is especially prominent when viewed from parts of the John Bunyan Trail and Greensand Ridge Walk;
- Due to the topography of the site, its prominence and the size and type of development proposed, the allocation would 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 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.

2.4 The Inspectors also raised major concerns regarding consistency in the site assessments. The Strategic Employment Site Assessment Technical Document scored the allocation Red/Amber for landscape character. It suggested that there is some limited scope for development to the west, with farmland to the east and north forming an attractive open setting to the Greensand Ridge. In contrast, the SA scores the allocation ‘+’ for landscape, with the potential for minor long-term positive effects.

3. CBC’s Proposed Policy rewording for SE2

Amend Policy SE2: M1 Junction 13 –Marston Gate Expansion as follows, to follow the existing criteria, to identify maximum building heights across the allocation as well as measures to ensure the visual impact of the development is limited and also mitigated where possible:

“All buildings within zones 1 and 2 of the allocation, as identified on the Policies Map, will have a maximum height of 18.5m and buildings within zone 3, as identified on the Policies Map, will have a maximum height of 15m. Across the development, all buildings must include:

- the use of multi-barrel vaulted roof profiles which replicate those within the existing Marston Gate site (the Amazon, XPO and Dwell units) but with a further softened roof line to contribute to a reduction in the visual height of buildings with reduced eaves and no parapets;*
- the use of colour banding and darker shades at lower levels, to add gravitas to the base of the building, with colours lightening up the elevations. The colour palette, which will be agreed with the Council, may consist of browns, greens and greys to aid the buildings integration into the surrounding landscape; and*
- the use of targeted off-site planting to be agreed with the Council and relevant landowners, to aid with mitigating key views”.*

4. EXAM 106

Adequacy of the landscape response

- 4.1 It is clear from EXAM 69 that the Inspectors have concerns about both the landscape and visual impacts of SE2; and although the visual impact arising from the prominence, appearance and location of SE2 is the key issue, this is related back to the importance of the views as an intrinsic part of the character of this area. This importance has been set out at length in my earlier submissions.
- 4.2 EXAM 106 is however solely an exercise in assessing the visual impact on a limited number of viewpoints, plus some assessment of the impact on heritage assets which falls outside of the remit of this report. There are however serious questions about the validity of the montages, regarding the assessment in Appendix A and the effectiveness of the proposed off-site planting. EXAM 112 and 115 both rely on

EXAM106, and no other documentation or evidence, as is made clear in the SA, in reaching their conclusions.

- 4.3 The Council believes that the proposed changes in EXAM 106 are sufficient to resolve the Inspectors' deep concerns. In the following sections I suggest that this is not the case.

Proposed reduction in height and new roofline

- 4.4 It is proposed to reduce the maximum height of the buildings by 3m to 18.5m (Zones 1 and 2) and 15m (Zone 3). Zone 1 lies in the west of the site but both Zones 2 and 3 lie to the east, both closer to the Greensand Ridge. The closest existing buildings at Marston Gate are between 13.1m and 16.67m high [see EXAM 106 Figure 1]; 5.4m to 1.83m below that proposed in Zones 1 and 2. EXAM 106 Figure 2 shows the proposed raised platform levels onto which the buildings will be built. These platform levels 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 height of the roofs at Marston Gate are approximately 101.5 AOD. The SE2 development in Zone 2 would be up to 107m AOD. Exam 109 suggests that the building heights may need to go up to meet an end-user's requirements. It will be very difficult for the Council to restrict development to the heights in Policy SE2 if they are under economic pressure to approve a development.
- 4.5 The extent of the proposed buildings has not changed. The scale of the expansion into open countryside is well represented in EXAM 106 Figure 1, although being in the distant ground it looks smaller compared to the existing site in the foreground. 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.
- 4.6 EXAM 106 suggests that the multi-barrelled roof is an additional mitigation. However, the Design and Access Statement by Prologis in November 2018, which the Inspectors will have seen, clearly illustrates a multi-barrelled roofline at the time. There is no change here.

Proposed colour palette

- 4.7 EXAM 106 includes proposals for horizontal colour banding with *darker shades at lower levels to add gravitas to the base of the building, with colours lightening up the elevations to aid with reducing the visual impact*. Attention to the external rendering is to be welcomed but a development of this mass and scale cannot be satisfactorily mitigated through such measures. EXAM 106 Figure 39 (vertical and horizontal banding with a deeper green upper level and colours varying from mid grey to deeper green) however does not illustrate the above horizontal banding. The Figure 39 colour way is also adopted in the photomontages. In contrast, the Council wish to see horizontal banding with light higher levels, as stated in the amended Policy SE2. This throws a good level of uncertainty as to what might be delivered through any planning application.
- 4.8 As even the limited photomontages show, the development will be visible from a variety of viewpoints where often the roofs and upper bands will be most prominent. The montages illustrate the difficulty in selecting colour bandings when the development is visible against both open sky and the greens/greys/brown of the hillsides. However, the existing Marston Gate buildings show how prominent paler colours can be, even where they are seen against the sky.

Proposed landscape planting mitigation

- 4.9 There are no changes proposed to the on-site planting or the land modelling, on which it will be planted, and my previous comments on this still apply. The proposed on-site planting will provide no screening to the mass and scale of the development, solely softening the lowest levels of the buildings. EXAM 106 proposes a limited amount of additional off-site woodland belt planting (roughly 200m long x 9m wide) along Ridgmont Road, east of the village, which it is suggested will 'provide a screen to the development when viewed from the upper levels of Segenhoe Manor by year 15' and 'will also minimise and potential views on the approach to the village of Ridgmont on the High Street'. No attempt has been made to further address the adverse impacts on all the other sensitive viewpoints.
- 4.10 It appears that the off-site planting is designed solely to try and mitigate the visual impact on Segenhoe Manor. The planting, as proposed, cannot be relied upon to mitigate the impact.
- The proposed planting mix is not supported. The mix is of native species except for the Metasequoia. The Metasequoia would however be incongruous in this rural location. Pinus nigra is not a good screen tree although native. The resulting native mix will, apart from the pine, will also lose their leaves in winter.
 - The long term success of the planting is in doubt. The success of this planting is highly dependent on maintenance and management by a third party, which is out of the Council's or Prologis' or the final developer's control.
 - The off-site screening would be far less effective than suggested by EXAM 106. The planting would provide little or no mitigation and should not be relied upon.

Lighting effects

- 4.11 Exam 106 does not assess night-time effects and to my knowledge the Council have not undertaken a light obtrusion impact assessment. I understand that there are no changes to the lighting proposed which will operate 24/7. The proposed mitigation measures will little or no difference to the lighting effects especially during the 6 winter and leafless months, thus extending the impact across the undeveloped valley floor, with lighting visible against the slopes of the Greensand Ridge. Although lighting can be mitigated by modern installations, it would not be able to achieve the Institute of Lighting Engineers Pollution Zone E2 for a Rural Area¹. The site is rural and unpopulated as is almost all of its immediate and surrounding area. The clustered high levels of lighting at Marston Gate and lighting to the M1 do not justify intensification across a valued landscape.
- 4.12 Most of the views, but in particular those from the Greensand Ridge, most of the footpath network, historic assets such as Segenhoe Manor and Exam 106 views 2, 9, 12, 17c, 19, 20, 23, 24 and 25, will be affected by substantive lighting impacts.

Analysis of EXAM 106 photomontages and selected viewpoints

- 4.13 BCA has included, over time, three different sets of viewpoints, none of which seem to have taken on board additional viewpoints from myself and others. My comments on the first two are set out in my earlier attached reports. EXAM 106 Figure 4 shows the latest set. Whereas earlier viewpoints 2, 9, 12, 13, 16 and 19 have been reused, others have been dropped. New ones have been added with an emphasis on historic viewpoints. The viewpoints from the Greensand Ridge and rural footpath network have therefore again been badly under-represented.

¹ Institution of Lighting Professionals Guidance Note 1/20 Guidance notes for the reduction of obtrusive light

- 4.14 I have concerns about the accuracy of the photomontages. There is no statement within Exam 106 of the methodology used to produce the wirelines or montages. Although it is difficult to judge the accuracy in most cases, viewpoint 9 is helpful. In this view the proposed development is considerably closer to the viewer, the nearest development Zone 2 is 107m AOD at its highest point (set on the proposed raised platform) which is approximately 5.5m higher than the Marston Gate building in the view (ref Exam 106 Figures 1, 3 and 4). Taking these two into account the wireline should be considerably above the line of the existing Marston Gate building. However, Figure 8 shows the development almost at the same height. This raises serious questions regarding the validity of the wirelines and montages. Furthermore, the earlier scheme is illustrated in red wirelines but changed to a blue wireline for the current version, falsely suggesting a lesser prominence in the landscape. For the following analysis I have based my comments on what is illustrated in EXAM 106. The visibility of the proposed development may well be much greater.
- 4.15 EXAM 106 Viewpoints 2 and 23: The development would still break the skyline to the west, and, as before, is set against the hillside in the east. It is still well above the existing built form and clearly shows the mass and scale of development into open countryside, with a significant adverse impact on views of the Greensand hillside. The proposed additional off-site planting has no effect on these views. As these are elevated views the paler upper levels and roofs will be more prominent than illustrated in Figure 42. The elevations will be clearly apparent as mass built form not as rural hillside.
- 4.16 EXAM 106 Viewpoint 9: There is clearly no change to the proximity of the proposed development and the effect of its scale. Although the roofline is lower than the original, it would be higher than the Marston Gate skyline. Overall, the reduction in the height will bring very limited benefits to the viewpoint. More muted colours would be less prominent but would not break up the mass and scale of the development. The proposed additional off-site planting has no effect on this view.
- 4.17 EXAM 106 Viewpoint 12: The changes in height are shown to make no material difference in this view from the Greensand Ridge. More muted colours would be less prominent but paler upper levels and the roofs would remain conspicuous and would not break up the mass and scale of the development. The proposed additional off-site planting has no effect on this view. As these are elevated views the paler upper levels and roofs will be more prominent than illustrated in Figure 44. The elevations will be clearly apparent as mass built form not as rural hillside.
- 4.18 EXAM 106 Viewpoint 13: The changes in height are shown to make no material difference in this view from the Greensand Ridge and in the landscape setting of Segenhoe Manor. The development still breaks the tree line, with the lighter colours of the upper elevations and roofs still conspicuous.
- 4.19 EXAM 106 Viewpoint 15a: The wirelines and montages suggest that there would be some benefit from the reduced heights in this private viewpoint in a field. The proposed additional off-site planting, which is behind the viewpoint, has no effect on this view.
- 4.20 EXAM 106 Viewpoints 16b, 18, 21, 22: No view in these viewpoints as illustrated.
- 4.21 EXAM 106 Viewpoint 17a: In 17a the proposed revised development appears to drop below the horizon and would no longer be visible.

- 4.22 In 17b the development would break the wooded rural skyline, and the lighter colours of the upper elevations and roofs may assist in blending the development, which is likely to be much higher, against the sky. However, the existing Marston Gate buildings show how prominent paler colours can be, even where they are seen against the sky.
- 4.23 In 17c much more of the development would be far more visible with darker colours contrasting with the sky. The existing Marston Gate buildings show how prominent paler colours can be, even where they are seen against the sky. The planting would provide little or no mitigation and cannot be relied upon.
- 4.24 As suggested earlier, there seems to be inconsistency between the Marston Gate buildings and that shown in the blue lines. Allowing for the proposed new heights and the platforms, and the slightly closer proximity to the view point, the proposed development blue line in Figure 22 Viewpoint 17c should be substantially higher than the Marston Gate buildings. It however appears substantially below. Figure 45 is therefore misleading as not only it is probable that the buildings would be higher but the planting will at best only filter views of the development. A much longer period of successful establishment of both trees and shrubs would be needed to achieve the density and height required. The view of Lowhill Plantation illustrates how visual permeable a woodland can be.
- 4.25 EXAM 106 Viewpoints 19 and 20: The changes in height are shown to make no material difference in this view from the Greensand Ridge. A muted colour palette would assist as the view is through trees. The proposed additional off-site planting has no effect on this view.
- 4.26 EXAM 106 Viewpoint 24: The reduction in height does reveal more of Ridgmont church spire but the view of the spire would still be in the context of the new development which would still break the tree line. The proposed additional off-site planting has no effect on this view.
- 4.27 EXAM 106 Viewpoint 25: The changes in height are shown to make no material difference in this view from Ringwork. More muted colours would be less prominent but paler upper levels and the roofs would remain conspicuous and would not break up the mass and scale of the development. The proposed additional off-site planting has no effect on this view. As these are elevated views the paler upper levels and roofs will be more prominent as partly illustrated in Figure 46. The elevations will be clearly apparent as mass built form not as rural hillside.

Comments on EXAM 106 conclusions

- 4.28 *The reduction in building height and additional mitigation measures will result in a reduction in effect from the majority of views:* There would be some reduction in effect due to these measures but these proposed changes are wholly inadequate to overcome the Inspectors' concerns, and those of the Parish. Notwithstanding the limitations to the chosen viewpoints, which omit many of the views from the Greensand Ridge, the footpath network and other local public viewpoints; the changes do not overcome the adverse landscape and visual impact on individual viewpoints, and the local landscape and Greensand Ridge as a whole. Although slightly reduced, the effects of the development at this mass and scale, extending so far into the Greensand Ridge landscape, remain unacceptably harmful.
- 4.29 *The reduction in height will reduce the proportion of development visible in views and ensure that a greater proportion of the development sits below the skyline of the*

surrounding ridge line. The changes are not sufficient to make a material difference, as shown in the photomontages and wirelines (the validity of which is questioned), and the proposed development would still be especially prominent when viewed from parts of the John Bunyan Trail and Greensand Ridge Walk and some historic assets such as the Grade II* Segenhoe Manor; would still have a significant visual impact from the surrounding network of public footpaths; and would not be mitigated by the additional landscaping. The Inspectors' concerns have not been overcome as the residual prominence, size and type of development and appearance has not materially changed.

- 4.30 *The use of a muted colour palette of greens, browns and greys, in addition to the variation of colour and texture along building elevations and a softened roof line, will dramatically reduce the prominence of the development when viewed from the surrounding landscape. This will be particularly effective when the development is viewed from more elevated ground on the surrounding ridge line:* There is no change to the roof line suggested by Prologis in 2018. The colour palette is an improvement on the existing pale Marston Gate buildings but if the upper parts of the elevations and roofs remain pale these will remain prominent. As the form of the mass and scale of this development, on artificial elevated platforms, with all the additional highway works, lighting, signage etc, will remain hard, urban, bulky and discordant with the existing gentle rural landscape of fields and woodland.
- 4.31 *The proposed strip of off-site planting will provide a screen to the development when viewed from the upper levels of Segenhoe Manor by year 15. It will also minimise and potential views on the approach to the village of Ridgmont on the High Street:* Reliance on off-site planting to mitigate the visual impact on views from Segenhoe Manor and the setting of Ridgmont village does not provide sufficient certainty to justify support for the proposed development. These two views are also a small part of the complex number of views from the Greensand Ridge, local footpath network and surrounding landscape as well as from the historic assets of the area.
- 4.32 The adverse impacts on the significance of the local historic assets are beyond the scope of this report. However, the site in its current rural state does provide a positive and valued landscape setting to these assets. Views from these assets contribute to the qualities of the Greensand Ridge landscape and the defining landscape characteristics of the area.
- 4.33 EXAM 106 fails to address the Inspectors' concerns that the appearance of the development would be harmful to one of the defining landscape characteristics of the area. [My underlining] Changes proposed to the appearance of the development do not address the underlying and remaining adverse effects of its mass, scale and character of the proposed built form, nor the accompanying changes to this landscape through major land modelling, road links, ancillary development and lighting. The impact of the development is more than the individual effect on each of the numerous viewpoints, but also the collective negative effect on the value of the views from, and to, the Greensand Ridge and its assets as a key defining feature of this valued landscape.

Examination of Appendix A

- 4.34 Exam 106 includes a Summary of effects and mitigation table in Appendix A but this only reviews the historic assets and none of the multitude of views identified in the Prologis ES or by myself or other objectors such as the Greensand Trust.
- 4.35 I have reassessed the visual assessment undertaken for Segenhoe Manor, as an example, for accuracy. I have assumed that the reduction in height and colour banding have already been taken into account in reaching the conclusions in 'Effects before mitigation' as would be current best practice. The viewpoint as a residential house and historic asset is of 'high sensitivity' (recognised by Exam 106). The 'Effects' before mitigation is said to be 'minor/moderate'. For this to be accurate the magnitude of change would need to be 'negligible' (ref Methodology in 2018 Prologis ES Landscape Chapter para E3.33). The Exam 106 wirelines show that there will be views of extensive large scale development from ground floor, first floor and therefore also second floor windows replacing views of the lower open hillside of the Greensand Ridge. An 'Effect' of 'major/moderate adverse' ie between 'causing a significant deterioration in the view' and 'causing a noticeable deterioration in the view' (ref Methodology in 2018 Prologis ES Landscape Chapter para Table E3.32) would be much more accurate. This underplaying of the effects is likely to occur across Appendix A.
- 4.36 The 'Residual Effects' are said to be 'Minor/Negligible' adverse taking into account the proposed planting mitigation. I have already shown in my previous evidence that the on-site planting would be ineffectual in screening the development in views from Segenhoe Manor and other viewpoints. The proposed off-site planting is outside of the control of the Council or the eventual developer and relies on the third party to continually maintain and manage this woodland from day one and in perpetuity. The effects would remain Major to Moderate adverse. The uncertainty of this off-site planting reduces the likelihood that the impact can ever be reduced and at best would take a considerably long time to materialise. Views will always remain in the winter. The screening would not suffice for the darkness hours when the building and site is illuminated.
- 4.37 The landscape of the site clearly forms a part of the visual and rural setting to the Grade II* Segenhoe Manor as illustrated in Exam 106's photographs. The existing Marston Gate development is visible from viewpoints 17b and c and the second floor but it is contained to the west and does not intrude into the rural setting comprised of the lower flatter site and the lower hills of the Greensand Ridge. Nor does the M1. If the height of the development has been under-represented views from viewpoint 17a and 16b as well will also be affected. Overall the proposed development would significantly affect the views of the rural setting to Segenhoe Manor.

5. EXAM 115

- 5.1 The LUC SA does not list any new landscape sources to inform the SA; therefore, it can be concluded that the baseline position has not changed from when the Inspectors drew up their report. I note that none of the authors of the LUC Report are part of LUC's landscape teams, nor is there any evidence that LUC's landscape planning colleagues had an input into the landscape and visual assessment in the SA.
- 5.2 The SA criteria for landscape issues is flawed. The criteria only refer to landscape designations as valued landscapes but this is not in accordance with NPPF 170 a) which includes those of *identified quality in the development plan*. The Greensand

Ridge falls within this category, for the reasons set out in the various documents. The SA undervalues the sensitivity of the local Greensand Ridge landscape to which the site contributes.

5.3 The SA refers to the effect on ‘the overall rural landscape’. This generic term does not take on board the value of the Greensand Ridge landscape nor the specific concerns of the Inspectors. This criterium used in the SA is therefore too general.

5.4 The SA concludes that in landscape terms that SE2 is green ‘+ ?’. This is surprising given their own criteria, as described in Tables 3.1 to 3.3, and, if it were correct, would suggest that there are no negative issues arising from the development and that the allocation would bring positive benefits to the local landscape. This flies in the face of the evidence. The site is not previously developed land, it is not derelict, it is part of the open countryside, and it clearly contributes to the value and defining characteristics of the Greensand Ridge landscape. None of the landscape proposals for the site would enhance the status of the existing landscape, they are simply there to try and mitigate the adverse impacts of the development. Harm is inevitable to this landscape. This should be acknowledged. The development therefore would not satisfy a ‘green+’ as in described in 3.3: *remove an eyesore, or enhance the landscape and/or would regenerate PDL that is currently having a minor negative effect on the landscape/ townscape, or the site is identified as of low landscape sensitivity*. The ‘?’ refers to the uncertainty until more detailed work is done. This is not the case for SE2 which benefits from very detailed work carried out by Prologis and others, including myself. This evidence shows that at least the site deserves a ‘yellow –’, but more accurately an ‘orange –’ for landscape and visual issues.

6. EXAM 112

6.1 EXAM 112 recognises that there is discrepancy between the Council’s original Employment Site Assessment and the findings of the original SA. I have commented on this before. EXAM 112 criticises the assessment by the Council’s landscape expert on two grounds: that the officer was looking at the site through prism of a preservationist approach; and secondly it was not a high level assessment as was the SA.

6.2 I cannot say what approach was taken by the officer, but based on the evidence regarding the value of this landscape and the guidance in NPPF, it is not inappropriate to seek to protect and enhance valued landscapes, nor to recognise the intrinsic character and beauty of the countryside. Secondly, the officer had the benefit of good local knowledge of all the sites. EXAM 115 recognises more detailed assessment may be needed to assess a site – hence the ‘?’ added to the assessment tables. I would argue that, at both the higher level, based on the landscape baseline evidence, and at the local detailed level, based on site inspections and detailed studies for the Plan hearings, it is the Council’s original assessment that is more representative of the sensitivity of the site.

6.3 EXAM 112 relies on the robustness of the SA approach. I have shown above that EXAM 115 does not taken a robust or valid approach to the landscape assessment with regard to SE2. The criteria in the SA not properly applied to SE2.

6.4 EXAM 112 suggests that the development would provide landscape benefits. As I have set out before, the landscape contribution to the site is minimal and in the case of the artificial land modelling and, in particular the large hump in the north-east corner, harmful.

- 6.5 The document refers to the National Character Area Statements of Environmental Opportunity which identify the potential to create high quality green infrastructure (identified against SA Objective 5); for landscape regeneration in new development; and the need to protect the aquifers and quality of the River Great Ouse. I consider that what is being offered is not 'high quality green infrastructure' nor, even it was, would it justify the harm arising to this important landscape as a result of the mass and scale of the development. The site does not require regeneration, (that requirement is for elsewhere in the NCA) nor is it within the catchment of the River Ouse. The quality of the landscape was identified formerly by the AGLV but now is clearly expressed through national, regional and local character assessments as set out for the national relevant character areas NCA 88 and NCA 90; the regional Bedfordshire character areas LCA5c, LCA6A and LCA6B and local assessment of Aspley Guise. EXAM 112 refers to the strategy for the latter which includes conserving the subtle tributary valleys associated with the Great Ouse and enhancement/renewal of the landscape. Again, neither of these objectives apply to the site.
- 6.6 Looking at the national, regional and local landscape character assessments together the key objectives are:
- 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.
- 6.7 None of the above have been used to test the landscape and visual attributes of the site in the either EXAM 112 or Exam 115. As I have said before, the proposed SE2 fails all of these tests.

7. Conclusions

- 7.1 Contrary to the conclusions in EXAM 112 and 115, SE2 actually performs very 'weakly' in landscape and visual terms. This weakness is endorsed by the Inspectors' concerns. Rather than 'green +?', SE2 (even with the proposed three amendments) should have scored 'orange -'; based on the mass and scale of the development, the huge structural changes to the landform, and the continuing high visibility of the development. This scoring should have recognised the high value and key defining features of this Greensand landscape; the full landscape objectives for the area, not just the few selected by LUC; the correct application of the SA criteria selected by LUC; and the correct application of NPPF guidance in para 170 and 171.
- 7.2 As landscape and visual concerns were the key concerns raised that by the Inspectors in relation to SE2 in EXAM 69, the limitations in all three documents, even taking into account the proposed cosmetic changes, do not lead to a robust assessment of SE2 in the SA, nor to robust and accurate conclusions.

- 7.3 There are raises serious questions regarding the validity of the wirelines and montages. It is very likely that they are misleading. The accuracy of original 2018 Prologis ES images was not challenged as even this possibly understated presentation would result in totally unacceptable landscape and visual harm. As presented this harm will continue to be unacceptable, and the visual impact is likely to be much greater than shown in Exam 106.
- 7.4 No new assessment has been carried out on the effects of the John Bunyan Trail and Greensand Ridge Walk. Many viewpoints have been omitted, and ones suggested by myself and others ignored. No new assessment has been undertaken of the visual impact on the public footpath network as whole. I have shown that despite some changes to its appearance, the development does not meet the objectives for the Greensand Ridge landscape, nor does it avoid harming the part played by the open rural landscape of the site in the defining features of the Greensand Ridge. Finally, EXAM 106 shows that there is no intention to improve on the landscape planting on the site, and hence the Green Infrastructure. The scope for off-site planting is limited and its future highly uncertain.
- 7.5 Amongst the defining features of the Greensand Ridge are the numerous historic assets, many of which have a view over the site. Segenhoe Manor is a prime example. The visual rural setting of this Grade II* listed building extends northwards over the site, encompassing the Greensand Ridge. It is evident that the proposed development, notwithstanding the changes included in EXAM 106, would result in an unacceptable visual impact on views of this setting.
- 7.4 The Inspectors' key concerns have therefore not been overcome through the proposed changes in EXAM 106 and have not been demonstrated in either EXAM 112 or EXAM 115:
- 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;
 - Due to the topography of the site, its 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.

APPENDIX A: PREVIOUS REPORTS

RIDGMONT PARISH COUNCIL
CENTRAL BEDFORDSHIRE COUNCIL LOCAL PLAN 2035
MARSTON GATE EXPANSION: POLICY SE2

EXAMINATION IN PUBLIC MATTER 6 ISSUE 7: JUNE 13TH
AFTERNOON SESSION: SUMMARY OF SUBMISSIONS ON ADVERSE
LANDSCAPE AND VISUAL EFFECTS OF POLICY SE2

I. Introduction

- I.1 The Hearing Statement is prepared by Kirkham Landscape Planning Ltd on behalf of Ridgmont Parish Council in support of their objections to the proposed allocation of site SE2 (NLP244) as a strategic employment site and their request to change the Plan to omit the allocation of strategic employment site SE2. Its purpose is to summarise the landscape and visual objections to the allocation in response to Questions 7 and 8 under Matter 6 Issue 7.
- I.2 Full assessments of the landscape and visual effects of the proposed strategic site allocation SE2 and the specific Prologis planning application for the site (CB/18/04600/OUT) are included in KLPL's reports dated 21 February 2018 and 15 February 2019 respectively and have already been submitted.

Q7. What effect will the allocation have on the landscape character of the area?

Background

- 2.1 The site lies within the former local landscape designation an Area of Great Landscape Value (AGLV). This was replaced by the findings of the Bedfordshire Landscape Character Assessment in 2015. In 2017 the Central Bedfordshire Local Plan – First Draft Plan Appendix F identified that only a small part of the site NLP244 (now SE2) next to the existing Marston Gate was potentially suitable for development and that the remainder of the site was unsuitable in landscape character terms.

Comparison with local urbanising features

- 2.2 Since that time the site and surrounding landscape has remained rural in character. The existing development at Marston Gate has replaced the former brick works and the link road was completed parallel to the M1. The Council and Prologis put considerable weight on the presence of these features to justify the proposed allocation in landscape and visual terms. However, as can be seen on site and in the Prologis montages prepared by Barry Chinn Associates, the existing Marston Gate is much smaller in its mass and scale and is contained beyond the railway line in the main. This development was on degraded brownfield land and did not extend into to open countryside. Although the new buildings are more prominent than the old brick works, their visual influence on the surrounding landscape is contained to the east close to the M1 junction as can be seen in the Prologis photographic evidence. The traffic on the M1 is often visible but is of a much smaller mass and scale than the proposed employment use.
- 2.3 Although these elements are visible, they detract far less from the character and appearance of the rural landscape than the effects of what is proposed. This is

illustrated very well in the Prologis montages that have been submitted. However these selected viewpoints exclude several views that would also be materially affected such as north of Ridgmont, in other locations along the Greensand Ridge Walk and along John Bunyan Trail. The employment allocation as proposed results in major changes to the landscape and extends well into the open countryside and up into the lower slopes of the ridge. The buildings are much larger and more extensive, requiring large areas of parking, land remodelling, and would dominate the landscape in a way not currently experienced.

Valued landscape

- 2.4 NPPF states that a landscape does not have to be a designated landscape of statutory status to be considered as a valued landscape (under para 170 a). The documented evidence (see KLPL reports) points to the conclusion that the site lies within an area which, although not within a nationally designated landscape, is within and contributes to a valued landscape. The quality of the landscape was identified formerly by the AGLV but now is clearly expressed through national, regional and local character assessments as set out for the national relevant character areas NCA 88 and NCA 90; the regional Bedfordshire character areas LCA5c, LCA6A and LCA6B and local assessment of Aspley Guise. The Greensand NIA, supported by the Council, further recognises the value and quality of this landscape. These documents are important in identifying the value that the Council should attach to the landscape of the area. They endorse the value of an open undeveloped rural vale landscape to the setting of the Greensand Ridge.
- 2.5 All of the above documents provide an understanding of the quality of this landscape which in turn informs the development plan and in particular policy EE5 Landscape Character and Value. EE5 supporting text describes Valued Landscapes: *Whilst all landscapes are important, some will have particular value where they exhibit the specific attributes and characteristic landscape features of a specific landscape character area, meaning it is considered representative of the landscape type or has characteristics which create a strong sense of place.* EE5 concludes: *The Council recognises the importance of valued landscapes. Proposals that have an unacceptable adverse impact on valued landscapes will be refused.* The site and its landscape setting meet the tests for consideration as a 'valued landscape' and therefore should be protected from inappropriate development and enhanced:
- The quality of its specific features is identified through the documents that inform the implementation of development plan landscape policy;
 - Its value is identified at national, regional and local scales and by the Greensand Trust objectives. It is valued by not only the immediate local community but also by the wider community;
 - It includes several demonstrable physical attributes (which are recognised in the above documents) which raise it above an ordinary landscape.
- 2.6 We submit that the allocation would be contrary to the landscape character objectives for the national and regional character areas and those set out for the Greensand NIA and the Forest of Marston and result in harm to the key characteristics of this valued landscape and the future of the landscape of this area. These can be summarised as follows:
- Loss of open productive rural land at the foot of the ridge which makes a vital contribution to the character of the area and of the Greensand Ridge;
 - Deterioration in the public enjoyment of the landscape along recognised and valued promoted key footpath routes;

- Significant undermining of the objective to enhance the extant rural vale landscape following a history of degradation and in the light of current development pressures in the area;
 - Obstruction and deterioration of acknowledged far reaching valued views across a rural vale from the Greensand Ridge; to the landmark church spire at Ridgmont and to the horseshoe Greensand Ridge around the site;
 - Erosion of the tranquillity of the area away from the M1 and Marston Gate;
 - Adverse landscape and visual impacts on the sensitive rural settings of the rural conservation settlements of Ridgmont, Boughton End and Husbourne Crawley and substantive increase in urbanisation of the landscape context;
 - Erosion of the rural countryside setting of historic assets including Segenhoe Manor, the 12th century church of Segenhoe, the ancient scheduled monument at Maltings Spinney, the historic village of Ridgmont, All Saints church, Ridgmont, and St James church, Husborne Crawley.
- 2.7 The proposed strategic allocation SE2 would therefore result in significant harm to the character of a valued landscape and contrary to local Policy EE5.

Conclusions on the Council's and Prologis supporting landscape evidence

- 2.8 The Enfusion and Barry Chinn landscape character assessments for the Central Bedfordshire Council Local Plan 2035 Pre-Submission and Prologis application are shown to be incomplete and misleading and cannot be relied on (see KLPL reports). The evidence shows that there are major landscape and visual constraints on developing this site as a strategic employment area which have underplayed in promoting the site.
- 2.9 Although the strategic allocation does not go into any detail, this is provided through the Prologis application which helpfully shows that major infrastructure works such as forming flat platforms, cut and fill, disposal of soils on site into alien artificial mounds, steep contours, parking, access etc all further illustrate the harm to the natural landscape and its character.
- 2.10 Appreciation of the open landscape of the site and the landscape area is a key factor. The site is visible from the higher ground in a wide arc from Husbourne Crawley to the south-east (Prologis Viewpoints (VP) 2 and 3); the south (VP 4 and 5); the south-east (VP6 to 9 and 13); and to the north-east (VP11 and 12). These omit several key sensitive viewpoints along John Bunyan Trail; at Boughton End; along Greensand Ridge Walk linking Boughton End to the site; north of Ridgmont; and at Segenhoe Manor. The overall effect on the views from these locations would be major adverse, materially changing the character and appearance of the landscape. See also para 3.3 under Q.8.
- 2.11 We submit that appropriate Green Infrastructure cannot be effectively delivered which would conserve and enhance this valued landscape. The narrow belts of trees proposed around the site are constrained by the need to deliver highway infrastructure, sustainable drainage, access, and will be needed to protect existing interests on the site (such as the CLH Pipeline System). The peripheral planting will always be dwarfed by the mass and scale of the strategic allocation and therefore cannot mitigate the harm arising from SE2 nor contribute to a wooded landscape (in line with the Forest of Marston objectives) nor justify the proposed allocation nor mitigate any existing harm arising from Marston Gate. The perimeter open space is very vulnerable to erosion as a result of further demands for space to meet highway, drainage, built form and landform requirements. The Green Infrastructure provides mitigation which fails to protect or enhance the local landscape character, simply

reinforcing the built form intrusion into the landscape. Advanced planting, given the nature of the construction phases, is not an option.

- 2.12 The proposed strategic allocation SE2 would therefore have an unacceptable adverse impact on the landscape character of a valued landscape and its appearance of the site and its wider landscape area. These effects cannot be effectively mitigated. The proposal is therefore contrary to NPPF and the landscape polices of the Local Plan.

Q8. What effect will the allocation have on the Greensand Ridge NIA?

- 3.1 The proposed allocation would have a significant adverse effect on the delivery of the strategic objectives of the NIA i.e. 'the improvement, protection and preservation of the countryside of the Greensand Ridge' (Greensand Trust) and those of the Greensand Country Landscape Partnership i.e. to reverse the decline in the area's landscape character (resulting from modern development).
- 3.2 Our above response to Q.7 summarises the harm to the landscape character of the NIA which is identified as having continuity with and interdependence with the vale landscape within which SE2 sits. Enjoyment of the landscape is a key objective of the NIA with access to the Greensand Ridge Walk and the many other footpaths within the area including the John Bunyan Trail.
- 3.3 The site is overlooked by the adjoining NIA including views from the Greensand Ridge Walk and the John Bunyan Trail, which links with the Walk along the ridge between Segenhoe Manor and Boughton End. Views over the rural countryside of the vale, of which the site is a major part, are acknowledged to be of importance. The existing development at Marston Gate is often visible but at distance set beyond the railway line. The predominant and most prominent feature of the view is its rural character and the open countryside as it sweeps from the vale up onto the Ridge. The Prologis montages show very clearly the substantial increase in the mass and scale of modern shed like development which would result from the development of the strategic site and the material change in the nature of the views, introducing modern large scale development into the views, breaking rural skylines and significantly reducing the rural character of the setting of the NIA as seen from the Greensand Ridge Walk in its long loop from above Segenhoe Manor, past the site boundary, up to Boughton End; then along John Bunyan Way as it connects the two ends of this loop.
- 3.4 The NIA presently is affected by the night-time lighting effects of Marston Gate. However this is at some greater distance and is smaller in scale. The proposed allocation would introduce substantial increases in night-time lighting which, although this can be mitigated through good lighting options, inevitably would erode the night time darkness levels of the adjoining NIA.
- 3.5 The proposed strategic allocation SE2 would therefore have an unacceptable adverse impact on the landscape character and enjoyment of the Greensand NIA and would be contrary to the underlying objectives set out for the NIA.

RIDGMONT PARISH COUNCIL

PROLOGIS MARSTON GATE EXPANSION LAND TO THE SOUTH EAST OF PROLOGIS PARK, MARSTON GATE, BEDFORD

APPLICATION NO. CB/18/04600/OUT:

PROPOSED DEVELOPMENT OF 43 HECTARES OF EMPLOYMENT LAND MIX OF B8 WAREHOUSING AND DISTRIBUTION; ASSOCIATED B1 USES, A3 FOOD AND DRINK USES AND LORRY PARK INCLUDING 8 HECTARES OF SCREENING AND LANDSCAPING

A. Introduction

- A.1 This report is prepared by Kirkham Landscape Planning Ltd on behalf of Ridgmont Parish Council in support of their objections to the proposed development by Prologis under application number CB/18/04600/OUT. KLPL were appointed in January 2019 to comment on the landscape and visual aspects of the proposals and supporting documentation.
- A.2 I have considerable experience of assessing Landscape and Visual Impact Assessments (LVIA) for major applications on behalf of a number of local authorities. This has included providing evidence at both planning appeals and Examination in Public. I am very familiar with the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3) which forms the basis of best practice for all LVIA.
- A.3 In 2018 I provided a report to Ridgmont Parish Council in support of their objection in landscape and visual terms to the Local Plan Pre-Submission site SE2 (included in the Draft Local Plan 2017 as site NLP244). The proposed development covers the site allocation SE2. My objections to the allocation still stand so the Council is also requested to refer to the KLPL Report dated 21 February 2018 (attached as Appendix 1).

B. Documents

- B.1 This report draws on the application drawings including supporting landscape and visual documentation in the Landscape and Visual Impact Assessment (LVIA).
- B.2 Background landscape character assessment documents include:
- Central Bedfordshire Landscape Character Assessment LUC January 2015;
 - Aspley Triangle Landscape Sensitivity Study LUC 2007.

C. Landscape and visual objections to the Prologis development proposals

- C.1 Having reviewed the above documentation, I consider that the objections raised a year ago to the proposed allocation of site SE2 in the Draft Local Plan remain; and the more detailed information provided by Prologis fails to demonstrate that the proposed development could be delivered without substantial harm to the landscape

and visual qualities of site and its landscape and visual setting. On the contrary the details set out to meet highway, drainage, large level platforms and soil disposal requirements as well as construction of very large storage units, of a much greater mass and scale than the existing Marston Gate development, result in greater harm than anticipated when the allocation alone was considered.

- C.2 I have reviewed the LVIA prepared by Barry Chinn Associates in some detail. I do not consider that the LVIA provides an accurate assessment of the landscape and visual effects for a number of reasons. The Parish do not feel that it is required of them to produce an alternative LVIA and therefore I have drawn on the methodology set out in the LVIA to come to my conclusions. I consider that the LVIA cannot be relied upon and shows a disregard for the evidence as set out in the published landscape character assessments and underestimates the full extent of the visual and landscape impacts.

Landscape effects

- C.3 The LVIA draws on the landscape character assessment work carried out by LUC in 2015 for the Council and adopts the sub-divisions to the Borough's landscape character areas as set out in LUC's Aspley Triangle Landscape Sensitivity Study (2007). However, despite this, the LVIA fails to have regard to the strategy and guidance for LCAs 5C or 6B in the 2015 study and the conclusions on the effect of development in the adjoining Aspley Triangle on the adjoining LCA5C (i), including the site, as set out in the 2007 Study. These documents are important in identifying the value that the Council attaches to the landscape of the site and its setting as required of NPPF para 170 a) as required by GLVIA3. LCAs 6A and 6B together also form the Wooded Greensand Ridge where views over the open agricultural landscape of the site and LCA 5C are particularly highly valued. The LVIA places the site within sub-areas LCA 5C (i) and LCA 6B (i).
- C.4 **Landscape sensitivity:** The LVIA consistently underplays the sensitivity of the character areas and the local landscape features. 'Sensitivity' is evaluated from combining the 'susceptibility to change' and 'landscape value' (see LVIA Appendix E5). However, the LVIA provides no methodology to assess the landscape susceptibility to change or to explain how the LVIA arrives at the categories set out in Appendix E5 or its conclusions on susceptibility to change. At the same time although the LVIA explains to some extent how it arrives at the landscape value, it makes no reference to the strategies and guidance in the LUC 2007 and 2015 studies in order to determine value. As the site does not lie in a designated landscape, these are key to an independent understanding of the value of both landscape areas and features within them (see GLVIA3 paras 5.26/5.27). Only LCA 5C (i) has been given an overall medium sensitivity which has taken into account the fact that part of the LCA which is under Marston Gate and has more highway infrastructure. The remaining LCAs have been given lower sensitivities despite their overall more rural and largely undeveloped qualities. I conclude that the overall sensitivity in the LVIA is wholly unreliable and the overall sensitivity of the LCA's other than LCA 5C (i) are far too low. Even if the whole of LCA5C (i) is of medium sensitivity, the site itself is clearly far more sensitive to change than the land to the west of the railway line within Marston Gate or south of the site in the immediate highway corridor.
- C.5 **Sensitivity of LCA 5C (i):** For LCA 5C overall in the 2015 Study the landscape strategy is to **conserve** hedgerows and **enhance** and renew the landscape and

distinctiveness of the vale in particular safeguarding the open rural land at the foot of the Ridge as a setting for the ridge and the Greensand villages; avoiding further expansion of development; conserving a clear visual relationship between the clay farmland and Greensand Ridge; and conserving and enhancing recreational access between the vale and the ridge. This is endorsed by LUC's 2007 conclusion on the **moderate** sensitivity of this area to any residential development at Aspley Triangle (Fig 5.2). The 2007 Study focuses on the effect of development at Aspley Triangle but includes relevant statements on the sensitive aspects of the site area:

- a. *This area is very sensitive as the setting to the ridge*
- b. *Mass woodland planting to create screening could blur the contrast between the ridge and vale and block views to the ridge;*
- c. *Predominantly enclosure estate fields are a key characteristic;*
- d. *Local footpath routes (John Bunyan Trail) linking the vales and adjacent elevated landscapes are a key characteristic;*
- e. *Important views to the dramatic backdrop of the Greensand Ridge, forming the foreground and setting to Ridgmont and Husborne Crawley are a key characteristic.*

In contrast, in Fig 5.2 extensive areas in LCA 5C to the west; in LCA 1A; and to the north are of moderate/low or low sensitivity. Fig 5.2 also shows LCAs 6A and 6B with a higher medium-high sensitivity. The site is therefore in an area with the second highest landscape sensitivity.

- C.6 Sensitivity of LCA 6B (i):** In contrast, the LVIA gives an overall sensitivity assessment for LCA 6B (i) of medium-low. I agree with the LVIA that LCA 6B (i) has a medium-high value but it is also an area which is highly susceptible to change, given its overwhelming rural character and value of its landscape attributes. It is clear that this area could not accommodate the proposed development without harm to its key features. The overall sensitivity for 6B (i) should therefore be medium-high.
- C.7 Sensitivity of adjoining LCAs 6A and 6B:** These areas are of equal or even greater sensitivity given their character and value of their landscape attributes yet the LVIA concludes that they are of medium-low or negligible sensitivity.
- C.8 Magnitude of change to LCA 6B (i):** The LVIA significantly underplays the effect of the development of such large scale major development within LCA 6B (i), concluding that there is only a low magnitude of change and minor adverse effect. This does not take account of the proposed development which includes the erection of two very large buildings (unit 4 and the northern part of unit 3); extensive road access and parking, major cut and fill; storage areas; the formation of two large platforms (3 and the northerly part of platform 2); soil disposal and creation of an 8m high conical soil mound. Although only a relatively small part of 6B (i) is directly affected, the lower slopes and rising land of the site have a close relationship with the rest of the LCAs 6A and B and contribute to the landscape value and character of the Greensand Ridge. For a low magnitude of change and minor adverse to be correct the change should result in (according to the LVIA methodology Table E3.1): *loss to a small proportion of a minor landscape; a short term duration; and could be removed and the land reinstated.* On the contrary, the part of LCA 6B (i) affected is not a minor landscape and the site is not small; the effects are a long term and are permanent development. At the very least therefore the magnitude of change should be 'medium', leading to a **landscape effect on LCA 6B (i) of Major/Moderate adverse.**

- C.9 **Magnitude of change to LCA5C (i):** I agree with LVIA assessment of a medium-high magnitude of change to LCA 5C (i) as a whole resulting in a **moderate to Major/Moderate adverse effect**.
- C.10 **Effects on the site and site features:** Contrary to best practice, and the guidance in GLVIA3, the LVIA fails to assess the effect of development on the site itself (rather than the larger LCAs), a significant omission. The LVIA also bundles the site features into descriptions of these features over large areas. The lack of assessment of the direct effects on the site features and those features in close proximity to the development is also a significant omission. This has the effect of reducing the magnitude of change and sensitivity of these features with all effects (except the loss of agricultural land) given as minor adverse or negligible. Within the site there will clearly be a significant magnitude of change to the traditional rural setting of Ridgmont village; the arable food resource; the field structure; the soil resource; tranquillity on the site; the quality of the recreational experience of users of the John Bunyan Way and Greensand Ridge Walk; the landform; the openness of the site; and the setting of nearby heritage assets. The effects are therefore considerably more adverse than the minor to negligible claimed by the LVIA. The magnitude of change to the site must be high, resulting in a **Major/Moderate adverse effect on the part within 5C (i)** and **Major** adverse for that part of the site in LCA6B (i).
- C.11 The proposed development would adversely affect the open rural agricultural landscape character not only of the site itself but of the adjoining open land which forms the setting of the site. The LVIA argues that the presence of the existing Marston Gate and the M1 already undermines the value of the site. I agree that these urbanising features do affect the adjoining landscape to some degree but Marston Gate is contained by the railway line. In contrast the proposed development of the site would affect the open landscape to the north and the east and the surrounding Greensand Ridge landscape to a far greater degree. The proposed development would not be contained by a well-defined boundary feature, it would be on more elevated land and would be of a much greater mass and scale.

Visual effects

- C.12 The visual effects are also consistently underplayed in the LVIA. This arises from i) the failure to assess the most exposed viewpoints; ii) the lowering of the sensitivity of the viewpoints (as set out in Appendix E6); iii) the lack of assessment of such a large mass and scale of development which far exceeds the effects of the existing Marston Gate or the M1; iv) a lack of assessment of the effects of other features of the development (highway changes, land raising, extensive flat platforms, drainage basins, on site road network and extensive parking, ancillary infrastructure, lighting columns); and v) a low assessment of the magnitude of change despite the evidence of the submitted montages. The following are examples.
- C.13 The preliminary work set out in Appendix E1 Figure 9 and Appendix E4 identified an elevated exposed viewpoint on the John Bunyan Trail (no.42) for inclusion in the next stage. This viewpoint was also identified in my own Report. The LVIA Appendix E4 rightly rates this view and those along the Trail as High Sensitivity. However this viewpoint has not been assessed. The nearest LVIA view from the John Bunyan Trail is LVIA 13 on lower ground with a far less open view. The sensitivity has also been lowered to medium/low. In fact several viewpoints identified in the preliminary work have not been carried forward.
- C.14 Of the 14 LVIA viewpoints that have been assessed (see Appendix E1 Figure 10), there are other omissions in addition to above. For example there are no views from the long distance trails as they cross the site; from more open views north of Ridgmont village and from south and north-west of Boughton End where the development would have an adverse effect on key views to the spire of the Church of All Saints at Ridgmont.
- C.15 Appendix E4 rightly assesses the sensitivity of the footpaths as 'high' and of the rural roads as medium in accordance with GLVIA. The sensitivity of the footpaths is then consistently played down to, at best medium-high, and at worst medium/low on John Bunyan Way viewpoint 13 by the LVIA as set out in Appendix E6. In consequence the visual effects have been consistently understated.
- C.16 I understand that Historic England in their letter 25 January 2019 have also identified missing visual assessments from historic assets including Segenhoe Manor and the Brogborough ringwork. HE concludes: *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 not previously developed, increasing the visual impact on the setting of several designated heritage assets at Brogborough, Ridgmont, Husborne Crawley and Apsley Guise but also impact on the historic complex at Segenhoe which has previously not been visually affected by either the industrial area or motorway. We consider this would result in harm to the historic significance of these designated.* The LVIA should have contributed to an understanding of the visual impact on these historic assets but has not done so. This lack of understanding follows into the LVIA assessment of the effects on the heritage in Appendix E5. The LVIA assigns a medium-low sensitivity and a low magnitude of change resulting in a Minor adverse effect despite no evidence to support this conclusion, and in contrast to HE's conclusions.
- C.17 As an example of the harm that has not been assessed, there are views of the site from the principal windows on the first floor of the Grade II* Segenhoe Manor (see photograph below). As can be seen, these views are not affected by the existing

Marston Gate or the M1. The views are of the rural agricultural setting to the north of the manor. If the development were to go ahead it is likely to affect a wide stretch of the horizon, potentially breaking the skyline, significantly detracting from the current rural views and setting of the Manor.



- C.18 I agree that the visual impact on LVIA viewpoints 8 and 10 from the Trails would be up to **Major** adverse. The development has the effect of blighting the recreational experience of walking along these routes at close range for 3km, not just from these two viewpoints.
- C.19 The LVIA fails to fully consider the full magnitude of change resulting from the mass and scale of the development; and the changes in their totality. Using the LVIA methodology and the examples of viewpoints 2 and 3 where the existing Marston Gate development is slightly visible but the dominating character and appearance of the view is rural, the montages show a very large development (only part of it shown at times in the montage), where the magnitude of change is clearly going to be high (see LVIA Table 3.4). With a high sensitivity and high magnitude of change the effect would be **Major** adverse, not the moderate adverse given in the LVIA.
- C.20 It is recognised in several documents that the views across the lower slopes and vale of the Greensand Ridge are of high value. Most visual receptors are of high sensitivity and the views to and from the heritage assets from these viewpoints are important to the significance of the assets (see HE letter). The LVIA however concludes that with the exception of viewpoints 2, 8 and 10 the effect is moderate adverse or lower, despite the substantive change to the landscape shown in the montages.

Potential for mitigation of adverse effects

- C.21 The LVIA heavily relies on the proposed landscape mitigation to reduce adverse impacts which is there to mitigate the harm from the development (as a whole) and should not be regarded as a benefit or enhancement of the character and appearance of the landscape.
- C.22 Most of the proposed open space is linear and only 20-25m wide for long stretches. This narrow band is minimal given the mass and scale of the proposed development. It is severely constrained by the need to accommodate extensive highway changes to the south (which are currently under review and may need additional on-site works and /or sight lines); a comprehensive Sustainable Urban Drainage Scheme (SUDS) along the southern boundary; services; and steep slopes of 1 in 3.
- C.23 The application states that the development can deliver 8ha. of open space and through this contribute to the Green Infrastructure of the area. However the application documents do not set out a measurement of the cumulative or separate areas of open space proposed. Open space in linear form, on which the scheme relies (with the exception of the northern new land raised area), is a poor contributor to providing multi use and purpose open space as required by NPPF. Although sections of the recreational Trails pass through these areas, the quality of their setting and the recreational experience is considerably reduced through the proximity of 21.5 to 18m high buildings, roads and parking and loss of open views to the countryside. As it is so narrow and the scale of the development so great, the perimeter open space is also very vulnerable to erosion as a result of further demands for space to meet highway, drainage, built form and landform requirements.
- C.24 The Prologis Illustrative Landscape Plan shows section lines A to K. These do not include long section lines to show how the site landform will change and how it will change in relation to the surrounding countryside. I have therefore relied on the Earthworks Analysis for information. This shows that the proposed soil disposal mound in the north would be over 8m above the natural levels in a conical form rising above the highest point of the site. This is not acceptable as it would create an alien feature in the gently sloping south-west facing slopes of the Greensand Ridge. The alien landform would be compounded by the steep and sudden drop from this area into the platform of Plateau 3. This highly engineered and industrial change to the landform continues over the whole site. There is no attempt to respect the local character and appearance of the Greensand slopes or to integrate the development into the landscape.
- C.25 The LVIA acknowledges that the development cannot deliver much towards the Forest of Marston target for additional tree cover in the area which was designed to regenerate the landscape degraded by former brick working in an area also subject to growth pressures. The proposed site is not degraded or damaged, on the contrary it is good quality agricultural land that forms part of the open and valued Greensand slopes and vale. It is also valued for its openness which contrasts with the wooded upper slopes of the Ridge. The tree planting as proposed responds to the shape of the buildings and development needs, not the requirements for this landscape as set out in the landscape character assessments and other objectives to which the Council has signed up such as the Greensand Ridge project. The linear nature reinforces the shape and scale of the development rather than diminishes it.

- C.26 The LVIA also attributes significant screening benefits from the proposed planting, showing the adverse effects reduced by one or two scales within 15 years. Given the height of these buildings is 18-21.5m, the trees will need to have reached maturity to hope to screen the development. By 15 years they may be 6-7m high at best. The proposed width available for trees to the south, west and north (except for the conical hill area) is too narrow to provide a depth of planting to help screening. In the east the trees will be planted down the slope with only the most easterly planted significantly higher than the platform. The planting overall is insufficient to provide any substantive screening, especially from the more elevated and sensitive viewpoints at Ridgmont, Boughton End, along John Bunyan Way, the Greensand Ridge Walk, Segenhoe Manor, and Husbourne Crawley. The conical hill will appear incongruous in many of these views and in views from the north and east, it will rise above the natural landform with the appearance of landraising, a policy not supported by the Council. Eventual tree cover will exacerbate the incongruity of this feature. There is no precedent for such hills on the lower Greensand slopes, contrary to assertions in the LVIA.
- C.27 It is unlikely that any advanced or early planting can take place as suggested as the platforms and soil disposal will affect the whole site and planting could not be undertaken until the cut and fill works, highway works, and SUDS works are completed in the landscape areas. There is no mention of phasing the works except in the landscape section of the Design and Access Statement.
- C.28 No further attempt has been made to mitigate the impact of the built form through colour and texture palettes, smaller scale block formation, or green roofs. Should the Council be minded to support this harmful development, these aspects should be considered at the outline application stage and not left to Reserved Matters, given the sensitivity of the landscape and the visual receptors.

Night-time effects

- C.29 The adverse effects are compounded at night with the need for security lighting, flood lighting and street lighting on a site that is currently dark. Many views are already affected by the glare and skyglow from the M1 and the existing buildings as seen in the night-time assessment. However the development is of a much larger scale and will extend a considerable way eastwards thus materially increasing the levels of light pollution on sensitive viewpoints.

Cumulative effects

- C.30 Although further employment expansion is expected to be needed in Central Bedfordshire, the site is in a location which forms an important open rural interface between the existing employment and proposed housing development to the west and north and the sensitive rural settings of the villages of Ridgmont, Boughton End and Husbourne Crawley and of the all-important Greensand Ridge. Further development as proposed on the site would have a significant adverse cumulative effect.

Conclusions

- C.31 The LVIA tells us that the site is within 'an area recognised as a strategic employment area'. This is not correct as the preferred option to develop SE2 has yet to be examined at the Examination in Public and there is considerable objection to the inclusion of the site, and serious offers of the availability of alternative less harmful employment locations close to the Junction 13.
- C.32 The proposed development is contrary to much of the landscape and visual policy and guidance set out in NPPF. It is not environmentally sustainable as it would result in significant and demonstrable harm to the character and appearance of the site, its rural setting, the adjoining villages, the setting of historic assets and the valued views to and from the Greensand Ridge which has been acknowledged over time as of significant value. The development does not protect or enhance the natural or traditional built environment and is therefore contrary to para 8 c).
- C.33 The LVIA also overlooks the full requirements of NPPF para 127 as set out under a), c), d), and e). The development clearly would not 'add to the overall quality of the area' but significantly detract from its landscape and visual qualities. It is not 'sympathetic to the local character and history', or the 'surrounding built environment and landscape setting' to the north, east and south. It would not result in the creation of a positive or attractive sense of place (the proposed scheme is simply a functional very large distribution centre). Finally the scheme fails to optimise the potential for 'green and other open space' delivering a landscape strategy scheme that is disproportionately small in relation to the proposed development mass and scale. As NPPF says, the creation of high quality buildings and spaces is fundamental (para 124) and is perfectly achievable as demonstrated through many good quality schemes throughout the country. However in this case a change in design and reduction of the site area would not overcome the objections in principle to expanding major development into the lower Greensand slopes beyond the well-defined railway line.
- C.34 The LVIA refers to para 170 but omits reference to 170 a) regarding valued landscapes. A landscape does not need to be designated to be a valued landscape. In the absence of local landscape designations (the site used to lie within the Council's AGLV which remained in place until 2015) the statement of 'identified quality in the development plan' must be found in the relevant landscape character assessments which inform Local Plan policy EE5. EE5 is a clear statement of the Council's support for protecting the landscape and in particular valued landscapes. Notwithstanding the adjacent M1 and Marston Gate, the more objective landscape character assessments have consistently identified the site as part of a valued landscape not least for its role as i) part of an intact landscape character in good condition with individual landscape attributes and features of value; ii) its recreational value as an attractive stretch of the important recreational John Bunyan Trail and Greensand Walk routes; iii) as part of a recognised vista/ local view; iv) its perceptual quality as an integral part of an open and farmed landscape in contrast to Marston Gate and the M1 infrastructure; v) its characteristic pattern of planting structures of traditional field hedgerows that contribute to the character of the wider landscape; and vi) its role as a setting to the historic assets and the adjacent villages.
- C.35 NPPF para 171 retains the requirement to allocate development on land with the least environmental value. The site is not in this category and has acknowledged

value in landscape and visual terms. It also has an important potential role in contributing to reducing the environmental harm which already exists from the M1 and its infrastructure, Marston Gate and the forthcoming major residential site to the north and to delivering the objectives of the Forest of Marston.

- C.36 The proposed allocation would result in harm to a rural landscape that is recognised to be of particular value. In particular there would be a loss of, or damage to, the following valued landscape characteristics:
- Open productive arable farmland;
 - Traditional field pattern with hedgerows;
 - Lower open slopes of the vale;
 - Promoted long distance public rights of way through open countryside;
 - Panoramic and long distance views from the Greensand Ridge, and to the Ridge, from sensitive public viewpoints;
 - Open rural vale setting to the Greensand Ridge;
 - Public enjoyment of the Greensand Ridge;
 - Setting of the villages of Ridgmont, Husbourne Crawley and Boughton End;
 - Views to St James Church spire in its rural setting.
- C.37 The proposed allocation is also contrary to a number of objectives identified for this area:
- 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.
- C.38 The proposed allocation also does not meet the requirements for landscape aspects of Green Infrastructure as set out in various guidance:
- Creation of new landscapes that are strengthen the indigenous sense of place and link and enhance existing landscape features;
 - Improved public access and recreational opportunities;
 - Support for the work of the Greensand Country and Forest of Marston;
 - Regeneration and repair of the landscape;
 - Creation of multi-functional Green Infrastructure;
 - Woodland planting which respects wide open views across the vale.
- C.39 In conclusion, the proposed development is significantly and demonstrably harmful to the landscape and its visual qualities of the site and the surrounding area and would be contrary to national guidance and Local Plan policy. The LVIA consistently underplays the sensitivity and magnitude of change to both landscape and visual receptors and cannot be relied upon to reflect a true indication of the landscape and visual effects of the development.

RIDGMONT PARISH COUNCIL

**CENTRAL BEDFORDSHIRE COUNCIL LOCAL PLAN 2035
PRE-SUBMISSION JANUARY 2018**

MARSTON GATE EXPANSION: POLICY SE2

**PROPOSED ALLOCATION OF 43 HECTARES OF EMPLOYMENT LAND
(MIX OF B8 WAREHOUSING AND DISTRIBUTION; ASSOCIATED B1 USES,
A3 FOOD AND DRINK USES AND LORRY PARK INCLUDING 8 HECTARES
OF SCREENING AND LANDSCAPING**

A. Introduction

- A.1 This report is prepared by Kirkham Landscape Planning Ltd on behalf of Ridgmont Parish Council in support of their objections to the proposed allocation of site SE2/NLP244 as a strategic employment site. KLPL were appointed in January 2018 after the publication of the Central Bedfordshire Council Local Plan 2035 Pre-Submission in January 2018. Site visits were undertaken in early February.
- A.2 The Local Plan Pre-Submission site SE2 was included in the Draft Local Plan 2017 as NLP244.

B. Supporting documents

- B.1 This report draws on a number of published documents and other information provided by the Parish. These include:
- Central Bedfordshire Landscape Character Assessment LUC January 2015;
 - Central Bedfordshire Local Plan: Appendix VIIa November 2017
 - Central Bedfordshire Strategic Employment Site Assessment Technical Document July 2017 Appendix F and Appendix D;
 - Land at Ridgmont, Bedfordshire Landscape Appraisal fpcr August 2017 on behalf of Hallam Land Management;
 - Lichfield letter of 25 August 2017 with representations on behalf of Prologis;
 - Greensand Country and Greensand Country Landscape Partnership documents;
 - Mid Bedfordshire Landscape Character Assessment Stakeholder Workshop LUC 2006 (*earlier workshop to valued features of the Central Bedfordshire landscape*).

C. Local Plan

Emerging Central Bedfordshire Local Plan

- C.1 In July 2017 the Council published its Central Bedfordshire Local Plan – First Draft Plan Consultation which was accompanied by various technical documents. As part of the site assessment process, Appendix F to the Technical Report July 2017 includes an assessment of landscape character constraints at site NLP244 and concludes as follows:

Some limited scope for development in parcel to west of right of way. Farmland to east and north forms attractive open setting to the Greensand Ridge. Any development would need to be secondary in scale and not detract from the distinctive roofline of the Amazon warehouse and set within sufficient wooded mitigation to create a sympathetic rural edge. Important to retain development west of the railway and not allow spread into open countryside, or limit the attractive views gained from Ridgmont bypass and from elevated land to south and west.

- C.2 The author of the above comments shows a good knowledge of the area and examined the constraints in some detail. This conclusion was endorsed in the Appendix D Outcome of Strategic Site Assessments which concludes for NLP244:

Main issues: - Landscape considered some limited scope for development in parcel to west of ROW. Development would need to be secondary in scale to adjacent farmland, and not detract from Amazon roofline.

No overriding constraints. Development should be limited in scale and mass in accordance with Landscape comments. Site considered suitable to accommodate the proposed development. (My underlining)

- C.3 The above assessment rules out most of the site except for a small area of land west of John Bunyan Trail. However although this most westerly part of the site is more influenced by existing employment development and highway infrastructure it too is part of the open agricultural landscape east of the railway line.
- C.4 This same document considers nearby sites for employment: NLP034, NLP178 and NLP210. *NLP178 Land at Winterwoods Farm* is not considered to have any overriding constraints to development. The assessment concludes that in landscape terms NLP178 has capacity for mid-scale development with appropriate landscape mitigation.
- C.5 *NLP210 Land at Manor Farm Brogborough* is dismissed as a suitable site as it is on an exposed elevated ground on the Brogborough Ridge and development would have an adverse impact on the undeveloped skyline and hill slopes. However it was also dismissed because of adverse impacts on views from the Greensand Ridge Way and John Bunyan Trail. This acknowledges the sensitivity of these viewpoints which would also be affected by NLP244/SE2.
- C.6 NLP210 was also dismissed because the importance of its rural setting. NLP210 lies in a rural setting but it is also just west of Brogborough Village, the proposed allocation of housing north off Brogborough and west of the Marston Gate site. NLP244/SE2 is set within an equally rural setting with the Marston Gate development

to the west and proposed housing north of Brogborough to the north, separated by the railway line and medium sized open fields.

- C.7 Like NLP244, the Appendix F identifies very limited capacity for development in *NLP034 Land at Bedford Road, Husborne Crawley*. The rationale for limiting development also applies to NLP244: it is also part of the rural vale; it is also the foreground to the Greensand Ridge; views to the Ridge would be also blocked; the site also contributes to the openness of the vale; and dense screening would also not be in keeping with the local open landscape character. NLP034 lies within an area known as the Aspley Triangle which was assessed in some detail in 2007 to identify the sensitivity of this landscape to large scale residential development. The study shows that NLP034 lies within landscape character area 5C(ii)a which has a moderate to high landscape sensitivity. Although NLP244/SE2 does not lie within the Aspley Triangle, NLP034 shares landscape characteristics with NLP244/SE2.
- C.8 None of these options NLP034, NLP178 nor NLP210 were progressed as employment options into the Pre-Submission Draft. There is no clear transparent or robust comparative assessment to show why these three sites were rejected whilst NLP244 has gone forward where NLP244 is affected by similar significant landscape and visual constraints to NLP034 and far less than NLP178.
- C.9 The landscape and visual character of the site and the receiving landscape and nearby Marston Gate Amazon site have not changed since the publication of the July 2017 assessment.
- C.10 Central Bedfordshire then published its Central Bedfordshire Council Local Plan 2035 Pre-Submission in January 2018 with the site allocated as SE2. The SA in Appendix VI Ia, prepared by Enfusion, assessed the site and concluded:

This employment allocation is not located adjacent to or within the designated AONB landscape.

The allocation is within the Bedfordshire and Cambridgeshire Claylands National Character Area, and the statements of environmental opportunity identify the potential to create high quality green infrastructure (identified against SA Objective 5) and landscape regeneration in new development and the need to protect the aquifers and quality of the River Great Ouse.

Development in this allocation is considered overall to support these objectives with the potential for minor long term positive effects against SA Objective 13.

The site allocation is within the Salford-Aspley Clay Vale Landscape Character Type. Visually sensitive features in this area include the views to the Greensand Ridge and Woburn, and landscape sensitive features include hedgerow patterns and remnant areas of deciduous woodland. The landscape strategy for the area focuses on conserving the subtle tributary valleys associated with the Great Ouse and enhancement/renewal of the landscape. Development at the site allocation can contribute to the landscape strategy where applicable, with a positive effect. Some uncertainty until masterplanning completed.

- C.11 The SA concluded that the allocation of this site for employment would be a 'minor positive' one.

- C.12 The above shows that the author makes selective reference to the National Character Assessment NCA88 'Bedfordshire and Cambridgeshire Claylands'. No reference is made to the NCA 90: Bedfordshire Greensand Ridge lies to the east. This is a significant omission as NCA90 has a considerable influence on NCA88 in this location, with the site and surrounding open fields creating a open setting to the Greensand Ridge. It correctly makes reference to the Central Bedfordshire LCA 2015 and the Salford-Aspley LCA5C (Clay Vale LCT).
- C.13 The assessment contains a number of omissions in the NCA88 key characteristics and Strategic Environment Objectives (SEO) of the site and its setting which have skewed the findings. These are set out below:

NCA88 Bedfordshire and Cambridgeshire Claylands

- The NCA 88 includes extensive Clay Vales enclosed by the Bedfordshire Greensand Ridge and Yardley-Whittlewood Ridge. Key characteristics include: i) Brickfields of the Marston Vale area form distinctive post-industrial landscapes: these are now gone, replaced by Marston Gate; ii) Predominantly open, arable landscape of planned and regular fields bounded by open ditches and trimmed, often species-poor hedgerows: typical of SE2; and iii) recreational assets including Forest of Marston Vale Community Forest, woodland and wetland sites, an extensive rights-of-way network and two National Cycle Routes: as at SE2;
- SEO 1 requires: *Maintain and manage a sustainable and productive claylands arable landscape;*
- SEO 3 requires: *Plan and create high-quality green infrastructure to help accommodate growth and expansion, linking and enhancing existing semi-natural habitats. Regenerate the post-industrial landscapes of the Forest of Marston Vale and Peterborough to improve and create new opportunities for biodiversity, recreation, timber and biomass provision while strengthening sense of place, tranquillity, resilience to climate change, and people's health and wellbeing. This can be achieved by: Ensuring that any new developments incorporate well-designed green infrastructure, to include improved access and recreation opportunities for local communities and visitors; Supporting the work of the Forest of Marston Vale Community Forest to regenerate the area and repair the landscape, using trees and woodland to provide social, economic and environmental benefits;*
- The Landscape opportunities include: *Plan for and manage the impact of new development by ensuring that high-quality design secures biodiversity enhancements and access and green infrastructure provision which strengthen sense of place and landscape character; Support the work of the Forest of Marston Vale Community Forest to regenerate the area and restore the landscape.*

- C.14 The NCA 90: Bedfordshire Greensand Ridge is also important given the close inter-relationship between the vale and the Greensand Ridge. The following are also relevant:

NCA 90: Bedfordshire Greensand Ridge

- I. The NCA 90 includes both parts of the Clay Vales and the Greensand Ridge. Key characteristics include: *The rolling and elevated Ridge provides a north-west-facing wooded skyline offering extensive panoramic views across the lower-lying Bedfordshire and Cambridgeshire Claylands;*

2. The NCA 90 Strategic Objective SEO 4 is important: *Promote and protect the distinct character and geodiversity of the Greensand Ridge landscape, with its prominent sandstone ridgeline rising from the surrounding low-lying vales; protect the long open views and high levels of tranquillity to ensure continued enjoyment of the landscape and plan for the sustainable extraction and restoration of sites associated with the distinctive geology;*
3. An 'Additional Opportunity' is also important: *Manage and plan for the recreational use of the area by putting in place multifunctional green infrastructure networks and green space provision which respects intrinsic character and provides enhanced access and connections for people and wildlife;*
4. Under 'landscape opportunities' the NCA90 includes: *Manage development impacts, where possible obtaining improvements to biodiversity, access and greenspace, so that the structure of the area is maintained and the impacts of development on tranquillity and landscape quality in the area are minimised. Plan for multi-user networks of green infrastructure. Work to minimise the effects of light and noise pollution, especially from transport routes, in rural areas.*

C.15 Consequently the conclusions on key characteristics and strategic opportunities are inaccurate and misleading. There is no suggestion that development can provide a positive benefit overall through the potential to create high quality green infrastructure and landscape regeneration as the Enfusion assessment suggests. The importance of the views over the vale; the need to protect the low lying vales and long views and surviving tranquillity; and the need to promote recreational use have greater weight than the need to provide appropriate green infrastructure to development.

Central Bedfordshire LCA 2015

- C.16 There are important omissions from this document which is set out in more detail below in Section E. In summary:
1. References to LCA 5C are selective and omit a number of key factors;
 2. No reference is made to the Mid Greensand Ridge LCA6B within which the northern part of the site lies;
 3. No reference is made to the Woburn Greensand Ridge LCA6A which together with the Salford-Aspley LCA5C and LCA 6B form the landscape setting to the site.

Opportunities for Green Infrastructure

- C.17 The Enfusion assessment is also rather ambivalent about any potential for a landscape strategy describing it as 'where applicable' and dependent on masterplanning. In the light of such fundamental uncertainty in the mind of the author, it is not possible to see how a positive landscape conclusion could have been reached.
- C.18 In conclusion the Enfusion landscape assessment of SE2 is inaccurate, incomplete, selective and inconclusive and cannot be relied on. It has not taken into account all the relevant landscape character assessments at national and local level which has skewed their landscape assessment of the impact of employment development on the site.

D. Site description

- D.1 The entire site comprises 43 ha. under arable farmland which continues without interruption to the north and east. It is bounded by hedgerows which are typical of the local landscape pattern with a few hedgerow trees. Two long distance promoted footpaths cross the site: the John Bunyan Trail and the Greensand Ridge Walk. The topography of the site is gently sloping in the south rising more steeply in the north, forming the lower slopes of the vale below the Greensand Ridge at Boughton End.
- D.2 The site is surrounded by open vale countryside on three sides which extends and blends into the Greensand Ridge to the north, east and south. The M1 and the new A507 lie to the south of the site, creating a highway corridor through the rural landscape, with two pedestrian bridges over the A507. To the west of the site lies the Marston Gate Distribution Park. This large development lies on the former brick works (brownfield land) and west of the railway line and its tree lines which separate the site from this area. A small pocket of development, close to the Station Road/A507 junction, has breached the railway line.

E. Landscape context and character

Central Bedfordshire LCA 2015

- E.1 The southern and western parts of the site lie within LCA5C: Salford-Aspley Clay Vale and the northern part lies within LCA6B: Mid Greensand Ridge LCA6B. The key characteristics of LCA5C on or around the site are:
- A large to medium scale, gently undulating landscape;
 - Intermittent views provided across the vale to the prominent landscapes of the Greensand Ridge that borders the vale to the south and provide a sense of containment, plus views to the elevated clay plateau landscape to the north;
 - Land use predominantly defined by intensive arable cropping contained within large arable fields;
 - Fairly strong surviving pattern of field boundaries, although these are typically in a poor condition - short flailed, gappy or overgrown, strengthened by post and wire fencing. Old hedgerow lines are marked in places by surviving hedgerow trees;
 - The prominent, embanked M1 with conspicuous junction 13 with the A421 dual carriageway cuts east-west and dissects the landscape, having a dominant visual and audible presence together with the A421 and A507;
 - Individual farmsteads and associated agricultural buildings are scattered throughout the landscape are often set back from the roadside by long drives lined with tree planting;
 - Development surrounding J13 of the M1 including large scale building units exert a large scale and industrial influence in the south east of the area;
 - The recreational routes of various public footpaths link the vale with Woburn Sands and the adjacent village of Aspley Guise.
- E.2 The LCA5C landscape strategy is to conserve the hedgerow pattern, the tributary valleys and settlement of Salford. An overall strategy is to enhance and renew the landscape, most notably the hedgerow pattern to strengthen the landscape pattern and distinctiveness of the vale. The guidelines for development include the following:

- Opportunities for introducing new landscape elements e.g. woodland creation along busy transport corridors to reduce their visual and audible intrusion i.e. along the M1, junction 13 and A421. Woodland planting should respect wide, open views across the vale;
- Safeguard open land at the foot of the Ridge to provide the setting for the Ridge and the associated villages on the Greensand;
- Avoid expansion of main roads and junctions and ensure that any further growth of business parks does not further dilute the surviving rural character within the vale;
- Retention of agricultural hedgerows, appropriate new tree screening and careful design of boundaries and lighting will help create a sympathetic rural/urban edge;
- Strong structural woodland planting and landscaping, such as grassland, hedgerow corridors, new public green space and enhanced management of existing ancient woodlands;
- Conserve the clear views and visual relationship with the adjacent Clay Farmland (1a) and Wooded Greensand Ridge (6a, 6b);
- Conserve and enhance recreational access and connections e.g. from the vale to the Woburn Wooded Greensand Ridge (6a);
- Prevent further fragmentation of the landscape by large scale development and ensure active management of those areas that have already been fragmented/become marginal;
- Improve recreational connections with the Wooded Greensand Ridge.

E.3 The key characteristics of LCA6B on or around the site are:

- Large scale Ridge with a gently undulating ridge top; forming part of the prominent band of Greensand;
- Far-reaching, clear views across these adjacent open landscapes;
- Agricultural land is primarily in arable cultivation;
- The contrast of arable land and densely wooded areas creates contrasting perspectives from open and exposed to enclosed and sheltered;
- Primary transport routes including the M1, A507 and A6 and Midland Mainline railway cross north-south through the Ridge and reduce tranquillity although large areas of the Ridge have a remote character;
- The John Bunyan Trail and Greensand Ridge Walk cross significant tracts - connecting the Ridge with the adjacent area.

E.4 The LCA6B strategy is to conserve and enhance the landscape. The guidelines for development include the following:

- Retain views to important local landmarks, particularly at gateways to villages – e.g. the church spire at Ridgmont or the tower at Maulden in views from the south, keeping such views free from development which would detract or obscure;
- Restrict expansion of development associated with the J13 and encourage woodland planting to reduce the visual dominance of infrastructure in views from the south west of the character area.

E.5 The key characteristics of LCA6A around the site are:

- The Greensand Ridge Walk and Milton Keynes Boundary Walk crosses along a significant length of the area connecting Woburn Greensand Ridge with the adjoining Mid Greensand Ridge (6b);

- Role of the Ridge as the backdrop to the Vale (5c) - These views are sensitive to adverse change such as unsympathetic development within the foreground of the vale as seen from the Ridge top.
- E.6 The strategy is to conserve and enhance the landscape. The guidelines for development include the following:
- Conserve the setting and views to landmark churches which act as distinct focal points in the landscape;
 - Ensure any change (development) on the vale reflects this transition and respects the function of the flat vale as the foreground to the Ridge;
 - Conserve the contrast between the Ridge and the adjacent low-lying clay vales landscape. Avoid development at the base of the northern Ridge in order to conserve the contrast and dramatic change in landform and character between the two landscape types;
 - Conserve panoramic views from the Ridge across the adjacent Salford-Aspley Clay Vale (5c) and the role of the Ridge itself in providing a strong wooded backdrop and horizon.
- E.7 The above summary shows that there is virtually no landscape character support for allocating employment at site SE2/NLP244. The more negative detracting features to which Enfusion refer are outweighed by the positive landscape attributes of the site which are typical of those valued in the receiving landscapes.

Greensand Country

- E.8 The above evidence shows that site SE2/NLP244 lies either within the Greensand Ridge landscape character area or within its immediate vale setting. This is reinforced by the significance of the Heritage lottery funded Greensand County Landscape Partnership, of which the Central Bedfordshire Council is a key partner, which includes the north-east of the site. The vision for the area is *that by 2020 the Greensand Ridge will become a living and working landscape that is cherished by present and future generations and we will have reversed the gradual decline in the area's landscape character*. The Partnership anticipates a comprehensive programme to improve the landscape character and enjoyment of the Greensand Ridge countryside. With views over the vale a key feature of these greensand routes, in particular from the Greensand Ridge Walk, the proposed SE2/NLP44 would compromise these objectives. In particular, the promoted Greensand Ridge Walk (Walk 2) from Woburn to Ampthill takes the walker to several viewpoints where SE2/NLP244 would be highly visible including from south-east of Segenhoe Manor, from Ridgmont, across the site itself and from Boughton End.

Forest of Marston Vale

- E.9 The site lies in the southern part of the Forest of Marston Vale. The Marston Gate Distribution Centre had already been allocated for development when the Forest was designated in 2000 and therefore the objectives for the Forest took this development into account.
- E.10 The objectives of the Forest of Marston Vale point towards the further enhancement of the Marston Vale landscape and creation of greater public access and Green Infrastructure across the Vale. The Vale is a visually exposed landscape, the character of which should be retained. Retaining and improving access will

improve the opportunities to enjoy the restored landscape. The objective of the Forest of Marston Vale (FMV) is set out below:

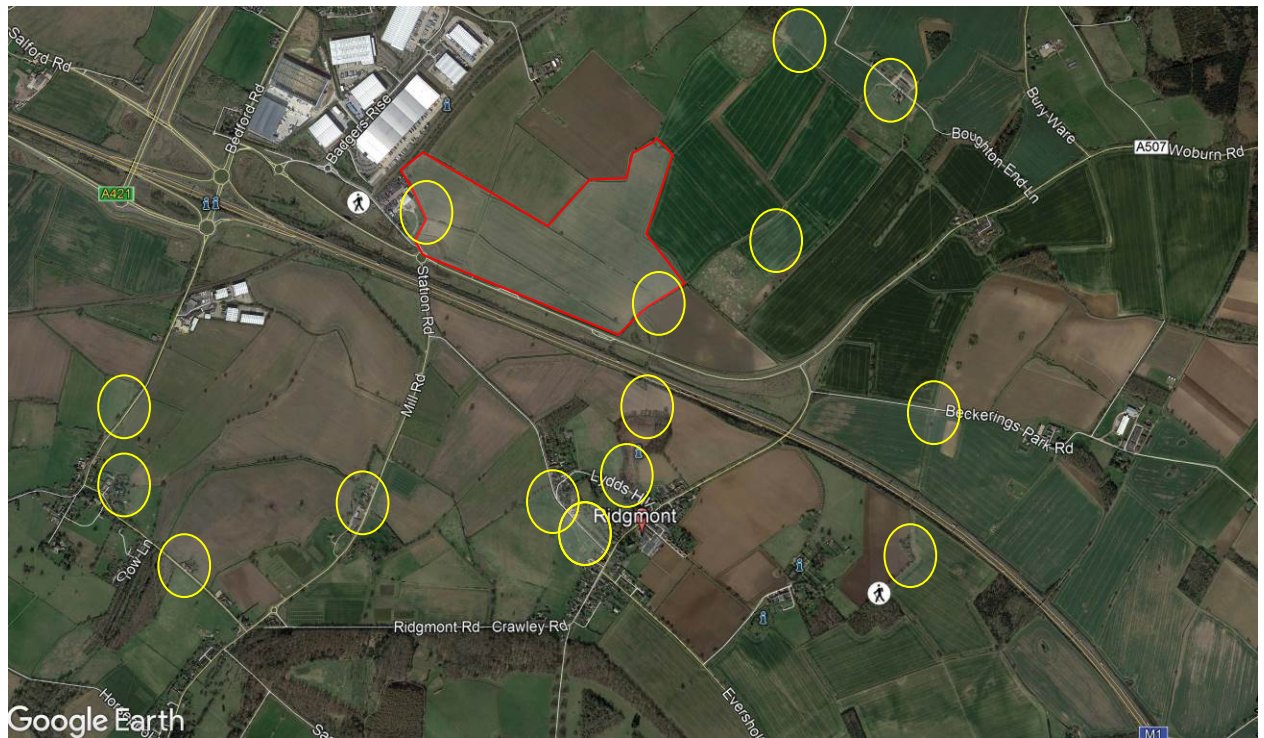
Established as one of twelve Community Forests in 1991, the Forest extends over 61 square miles between Bedford and the M1, with the aim of regenerating a landscape degraded by former brick-working in an area also subject to growth pressures. The key target is to increase woodland cover from 3% to 30% by 2031, achieving this through partnership working and community involvement. The Marston Vale is now a growing centre for recreation, biodiversity has been enhanced and significant new woodlands have been planted.

Former Area of Great Landscape Value (AGLV)

- E.11 The site lies in the southern part of the former AGLV which went up to the M1 and the railway line. (The AGLV is now superseded by the guidance within the Central Bedfordshire Landscape Character Assessment 2015.) There have been some changes within the area with the A507 Ridgmont by-pass and a small area of employment east of the railway line. Adjacent to the area the brick works have been replaced by Marston Gate development. However in other respects the landscape of the site, the adjoining vale and Greensand Ridge have not materially altered over the last 60-70 years (see Google Earth), with only some loss of hedgerows.
- E.12 The landscape of the site and its setting are part of a valued landscape as confirmed by the key characteristics and guidance within NCA88; NCA90; Central Bedfordshire Landscape Character Assessments for LCA5c, 6A and 6B; Greensand Country; Forest of Marston Vale, and the former AGLV.

F. Views of the site

- F.1 Views to the site, over the site, and from the site are clearly very important as identified above, and by the local community.
- F.2 I undertook a review of views in February 2018 in good clear conditions. The Aerial photograph below shows the viewpoints identified from key sensitive visual receptors but not all the footpaths have been walked so it is likely that further footpaths will be affected.



Extract from Google Earth showing site boundary and location of key areas with a views of the site

F.3 These include:

- Several locations along the *John Bunyan Trail* including as it crosses the site; from Ridgmont; from east of Segenhoe Manor; from west of Manor House Farm;
- Locations where the *Greensand Ridge Walk* meets the *John Bunyan Trail* east of Segenhoe Manor; and west of Manor Farm;
- *Boughton End* and parts of the footpath network to the west and south of the hamlet;
- Locations in and around *Ridgmont* including *Lydds Hill*, footpaths on *Castle Hill*, footpath around *Lowhill Plantation*, *Station Road*;
- *Mill Road* and the hamlet; and
- *St James Church*, *School Lane* and *Bedford Road* at *Husborne Crawley*.

F.4 In addition to views of the site, there are views over the site to Gilbert Scott's spire at All Saints Church in Ridgmont from Boughton End. In these views the existing development at Marston Gate is not visible and the view has a strong rural character forming the setting to the spire.

F.5 A number of the above views do see the site in the context of Marston Gate. This is a very prominent development due to its massing, height and external materials. However with the exception of the isolated development east of the railway line, the development sits within the footprint of former brick works and is bounded by the well-defined line of the railway and tree lines either side of the line. These are rather ineffective in screening Marston Gate but they do clearly separate the area from the open countryside to the east on the site and beyond.

F.6 In these views Marston Gate may be conspicuous but the scenic context is dominated by views of open vale countryside rising up into the Greensand Ridge.

G. Assessment

Description of proposals

- G.1 The site is being put forward in the Pre-Submission Draft as a strategic allocation for 43 hectares of employment land (mix of B8 warehousing and distribution; associated B1 uses, A3 food and drink uses and lorry park including 8 hectares of screening and landscaping. It is reasonable to assume that this development would not be dissimilar to that at Marston Gate and of a similar height and massing.

Visual impacts

- G.2 The visual impact of development of this scale in this location varies in detail in the views but in all cases the existing attractive views of a rural landscape which is highly valued, as described above, will be adversely affected to greater or lesser degree.
- G.3 **John Bunyan Trail:** The development would be visible in a sequence of views in a horseshoe south and east of the site along 3km of the route. Where it crosses the site, its rural context and the views to Greensand Ridge would be lost, and would be urbanised by surrounding development. Marston Gate lies beyond open fields and the well-defined railway line. In views from south of the M1, current views to open countryside rising up to Boughton End would be lost, with the expanse of development west to east increased by 200%. In views from Ridgmont and the east and from the several more elevated points, employment development would be much closer to the route, substantially increasing the mass, scale and visual intrusion of industrial built form and undermining the setting of the Greensand Ridge.
- G.4 **Greensand Ridge Walk:** In views from the east, from the several more elevated points of this route, again the development would be much closer, again substantially increasing the mass, scale and visual intrusion of industrial built form and undermining the setting of the Greensand Ridge.
- G.5 **Boughton End area:** This is a quiet rural hamlet which due to the topography is little influenced by the development at Marston Gate. The houses and nearby footpaths have attractive views to the St James's church spire and village. There would be views of the eastern part of the employment development to the detriment of the scenic value of these views.
- G.6 **Ridgmont area:** Despite the proximity of Marston Gate, the village and its immediate rural landscape setting are intact, contrasting favourably with the M1 and Marston Gate. The open countryside on the site and beyond contributes to reinforcing the rural context. The traffic on the M1 is visible but allows views through to the open landscape beyond. So although the site is always seen in the context of Marston Gate, it is contiguous with the wider open Greensand countryside, separated from Marston Gate by the well-defined railway line and tree cover. Development on the site would be much closer, more prominent and of a greater mass and scale than Marston Gate. Views to Boughton End and the hillside would be obstructed.
- G.7 **Mill Road area:** Mill Road has direct views to the site in the centre of the view with Marston Gate off at an angle to the west. The traffic on the M1 is visible but allows views through to the open landscape beyond. In these views the development would appear of a much greater prominence, mass and scale, again

extended by 200% W-E, than Marston Gate, obscuring all but the highest land on the hills.

- G.8 Husborne Crawley area:** The hamlet has a number of uninterrupted views to the hillside around Boughton End across the open countryside of the site. The traffic on the M1 is visible but allows through the open landscape beyond. In these views the development would appear of a much greater prominence, mass and scale, again extended by 200% west to east, than Marston Gate, obscuring all but the highest land on the hills.

Landscape impacts

- G.9** The proposed allocation would result in harm to a rural landscape that is recognised to be of particular value. In particular there would be a loss of, or damage to, the following valued landscape characteristics:
- Open productive arable farmland;
 - Traditional field pattern with hedgerows;
 - Lower open slopes of the vale;
 - Promoted long distance public rights of way through open countryside;
 - Panoramic and long distance views from the Greensand Ridge, and to the Ridge, from sensitive public viewpoints;
 - Open rural vale setting to the Greensand Ridge;
 - Public enjoyment of the Greensand Ridge;
 - Setting of the villages of Ridgmont, Husbourne Crawley and Boughton End;
 - Views to St James Church spire in its rural setting.
- G.10** The proposed allocation is also contrary to a number of objectives identified for this area:
- 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.
- G.11** The proposed allocation also does not meet the requirements for landscape aspects of Green Infrastructure as set out in various guidance that is contingent upon any development in the area:
- Creation of new landscapes that are strengthen the indigenous sense of place and link and enhance existing landscape features;
 - Improved public access and recreational opportunities;
 - Support for the work of the Greensand Country and Forest of Marston;
 - Regeneration and repair of the landscape;
 - Creation of multi-functional Green Infrastructure;
 - Woodland planting which respects wide open views across the vale.

- G.12 In a recent appeal, at Former Readshill Quarry, Back Street, Clophill APP/P0240/W/16/3152707, development was dismissed by the Inspector on landscape grounds. In his decision the Inspector makes some important general comments on the value of the Greensand Ridge and the Greensand Ridge Walk and local plan policy as follows. His paragraphs are in []. This conclusion is important in considering the current proposed allocation:

The site lies within the Greensand Ridge, which is one of the key landscapes in Central Bedfordshire, valued for its intrinsic landscape qualities and as a recreational and ecological resource. ...The Greensand Ridge Walk, which travels the length of the ridge, provides an important recreational footpath for walkers to enjoy the landscape of the Ridge. [14]

Policy CS16 of the Core Strategy seeks to conserve and enhance the character and distinctiveness of the landscapes defined in the LCA and to resist development where it will have an adverse impact on important landscape features. More specifically, Policy DM14 of the Core Strategy states that proposals which have an adverse effect on the Greensand Ridge, amongst other noted landscapes, will be rejected unless there is a particular need for, or benefit arising from the proposal that would override this requirement. [15]

Cumulative effects

- G.13 The site lies in an area which has been affected already in recent years by major changes though major expansion in the highway network and growth of Marston Gate Distribution Centre. Further plans include potential housing of a major scale to the north of Brogborough.
- G.14 Although further employment expansion is expected to be needed in Central Bedfordshire, the site SE2/NLP244 is in a location which forms an important open rural interface between the existing employment and proposed housing development to the west and north and the sensitive rural settings of the villages of Ridgmont, Boughton End and Husbourne Crawley and of the all-important Greensand Ridge. Further development on SE2/NLP244 would have a significant adverse cumulative effect.

H. Comments on the Prologis emerging proposals as submitted 25 August 2017

- H.1 It is anticipated that the masterplan for the site will have moved on since the illustrative site layout submitted at this time. This included six large buildings and 9ha. of landscaped area (1ha more than in Policy SE2). The largest of these buildings exceeds that of the Amazon building west of the railway line. The remaining buildings are also large extending into the rural landscape. They are wholly out of keeping with the local Greensand Ridge/Vale landscape character and would be of a greater mass and scale than the existing Marston Gate Distribution Park.
- H.2 The 9ha. of landscaped areas are spread around the perimeter of the site forming linear belts to the site boundaries. These would take decades to soften the development (as can be seen in the planting along the railway line) and would never screen development of this mass and scale.
- H.3 The Lichfield letter suggests that the site benefits from being contained by topography and the local landscape pattern. The site itself is not contained but is

open in character with strong continuity with the adjacent agricultural landscape. The surrounding ridge, rather than limiting any harm to the landscape, is valued for its views of and relationship with the vale landscape of which the site is a part.

- H.4 The illustrative drawing provided by Lichfield does not suggest a development that could avoid significant harm to this sensitive landscape and visual landscape nor any form of appropriate mitigation which would provide a contribution to the wider objectives for this area.

J. Main conclusions

- J.1 The Central Bedfordshire Local Plan – First Draft Plan Appendix F identified that only a small part of the site NLP244 was potentially suitable for development and that the remainder was unsuitable in landscape character terms. It also came to same conclusion with regard to NLP034. Whilst NLP034 was dropped, NLP244 was carried forward. Disregarding the landscape advice, the site is now proposed as a strategic allocation for employment.
- J.2 The Enfusion landscape character assessment for the Central Bedfordshire Council Local Plan 2035 Pre-Submission is incomplete, inconclusive and misleading and cannot be relied on. The evidence shows that there are major landscape and visual constraints on development this site as a strategic employment area which have not been taken into account.
- J.3 The Enfusion landscape character assessment for the Central Bedfordshire Council Local Plan 2035 Pre-Submission is ambivalent about the quantity or quality of any Green Infrastructure to accompany any development. Policy SE2 even reduces the amount of open space required from 9 ha. (as suggested by Prologis in August 2107) to 8ha. Comprehensive and multi-functional Green Infrastructure in keeping with local character and landscape objectives for the area is a pre-requisite of development. There is no evidence that appropriate Green Infrastructure can be delivered which would conserve and enhance valued landscape and visual features. The need to maintain the open agricultural character of this part of Central Bedfordshire also limits opportunities to screen the development without harming that character. Any tree planting under the Forest of Marston banner would have to meet this same constraint.
- J.4 There would be an adverse cumulative impact on the sensitive rural settings of the villages of Ridgmont, Boughton End and Husbourne Crawley and of the all-important Greensand Ridge.
- J.5 The evidence points to the conclusion that the site lies within an area which, although not within a nationally designated landscape, is within and contributes to a valued landscape. The presence of the Marston Gate Distribution Centre and the M1/A507 may have a visual influence but this is secondary to the landscape and visual attributes of the area.
- J.6 On the above basis, the proposed strategic employment area at site SE2/NLP244 would not be appropriate in landscape and visual terms and would have a major negative impact on the Landscape SA Objective.