

**RIDGMONT PARISH COUNCIL
OBJECTIONS TO
CENTRAL BEDFORDSHIRE COUNCIL LOCAL PLAN 2035
FURTHER CONSULTATION AUGUST 2020
MARSTON GATE EXPANSION: POLICY SE2**



The extent of Policy SE2, which is located in the heart of the Greensand Ridge Country

This submission focusses on the related issues arising from the Hearing Sessions into Central Bedfordshire's Local Plan and the Inspectors' letter dated 30th September 2019. It forms the basis of Ridgmont Parish Council's objections in relation to the soundness of Central Bedfordshire Council's Revised Sustainability Appraisal and other documents, which are the subject of the consultation. The objection is pursuant to the allocation SE2

INTRODUCTION

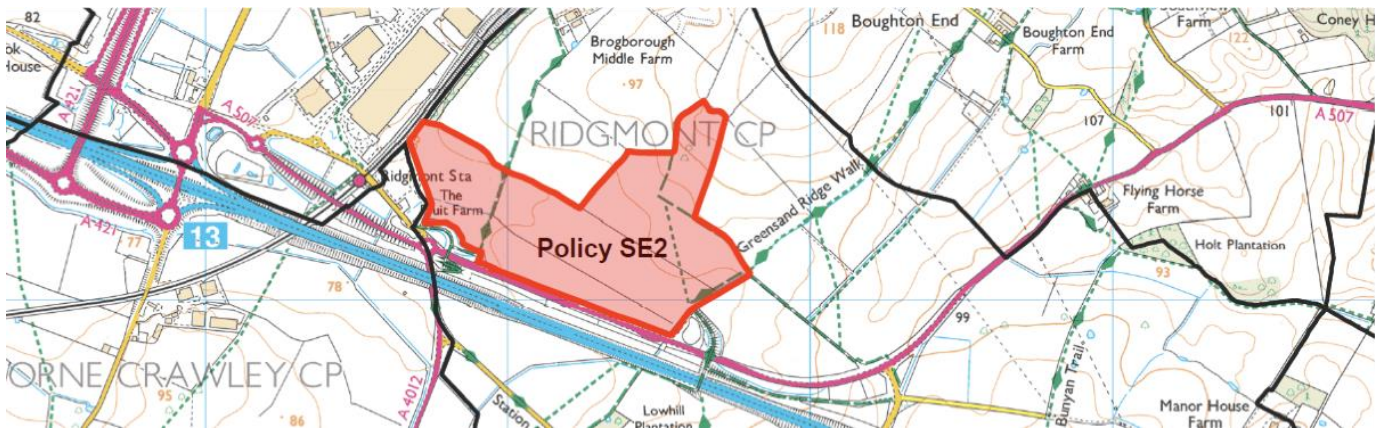
1. The full extent of the inclusion of Policy SE2 in the Local Plan and the additional supporting documents have been carefully examined and the following represents the unanimous views of Ridgmont Parish Council. This is a continued objection to policy SE2 and needs to be read in conjunction with Ridgmont Parish Councils' earlier submissions.
2. Despite the very clear concerns from the Inspectors, Historic England, Kirkham Landscape Partners, Ridgmont Parish Council, The Greensand Trust and local residents, Policy SE2, remains as an allocated site to build a warehouse and distribution centre. It is situated principally in the Parish of Ridgmont, but it is also partly in the parishes of Brogborough, Husborne Crawley, Aspley Guise and Lidlington. All five parishes are affected by this proposal in that the site is located in the heart of the nationally important Greensand Ridge country, the setting for numerous heritage assets with numerous public rights of way, notably the Greensand Ridge itself and the John Bunyan Trail. These footpaths have been well used by the visitors to the Greensand Ridge and the local population for hundreds of years and are most at risk of the detrimental visual impact of the proposal for warehousing and distribution.
3. The overall area of the land to be occupied by warehousing, and distribution centre is 35 hectares, equivalent to about 80 football pitches.
4. The current Marston Gate Industrial Park was built on the site of the old brickworks, designated as brownfield. The allocation Policy SE2 will necessitate building on open land immediately adjacent to the Greensand Ridge public footpaths and the John Bunyan Trail footpath will actually cross the site; the land south of the railway line has always been regarded as the buffer of protecting urban sprawl into countryside and should be retained as such.
5. This policy if adopted would allow the expansion of the Marston Gate distribution park onto open land not previously developed. The new site is to the east of the existing complex – further away from Junction 13, on the other side of the Bletchley-to-Bedford railway line, and into open countryside.
6. For years this area of countryside east of the Bletchley-to-Bedford railway line has been recognised for the quality of its landscape, forming part of the unspoiled setting of the Greensand Ridge as it crosses Central Bedfordshire from Leighton Buzzard to Sandy. This land also provides the setting for the nearby medieval ringwork fortifications at Brogborough Park Farm, a designated Scheduled Monument; three conservation areas at Ridgmont, Husborne Crawley and Aspley Guise; with Grade II* listed structures and Scheduled Monuments in Ridgmont, including the Gilbert Scott All Saints Church with its distinctive spire, a local landmark.

7. Historic England and the Inspectors examining the Local Plan have significant concerns about development in this location.
8. Ridgmont Parish Council is therefore astounded and disillusioned that the supplementary SA Local Plan Policy SE2 still allocates 35 hectares of land east of the railway line for employment uses.

LANDSCAPE IMPACT

Ridgmont Parish Council engaged Kirkham Landscape Planning to conduct an independent Landscape Assessment. We would ask that this report is read in conjunction with this submission (Appendix 1).

9. There has been a considerable body of evidence amassed by Central Bedfordshire Council (CBC) and its predecessor authorities over the last 15 years that this area of land is not suitable for development, and nothing has changed to undermine those conclusions.
10. In 2005, the land was designated an “Area of Great Landscape Value” in the 2005 Mid Bedfordshire Local Plan.
11. In 2007, Bedfordshire County Council’s Landscape Sensitivity Study concluded that *‘this area itself is very sensitive as the setting to the [Greensand] Ridge’*.
12. CBC’s 2016 Landscape Character Assessment recognises the need to *‘safeguard open land at the foot of the [Greensand] Ridge to provide the setting for the ridge and the associated villages’* and *‘restrict expansion of development associated with J13’*.
13. CBC’s 2017 Employment Site Assessment states that it is *‘important to retain development west of the railway line and not allow spread into open countryside’*. The Assessment went on to score the site *‘red /amber’* for landscape character.
14. The Employment Site Assessment did state that there is *‘some limited scope for development in parcel to west of ROW [Right of Way]’*, and at the Hearing Session into the Examination, Matter 6 I issue 7, June 13th 2019, the Inspector sought some clarity as to what this meant.
15. It was subsequently agreed by the Inspector, CBC, Ridgmont Parish Council, Aragon Land and Planning, the Greensand Ridge Trust and Historic England that the Right of Way referred to is the John Bunyan Trail, which crosses the western part of the site from north to south. As the council’s own policy map shows, only a very small portion of the proposed allocation site is west of the John Bunyan Trail, meaning that most of the site is outside the area considered to have any scope for development:



16. After the Hearings in their letter dated September 2019, Exam 69, the Inspectors charged with examining the Local Plan highlighted the limited scope for development:

'for the Marston Gate expansion (Policy SE2) the Site Assessment scores the allocation Red/Amber for landscape character. It suggests 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.'

17. We can find no reference in the supplementary SA to the Inspectors' question regarding the capacity of the site. This is critical to the viability of the allocation. The Inspectors' letter goes on to make clear that, in their view, the allocation is not justified on account of its landscape impact alone:

'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. Similar views were expressed by the Council's Landscape Officer in Examination Document F02, finding that the farmland to the east and north forms an attractive setting to the Greensand Ridge. Given the size of buildings proposed, the visual impact of the allocation would not be mitigated by additional landscaping.'

18. The decision to retain the allocation appears to be completely at odds with the evidence available:

'For the Marston Gate expansion (Policy SE2) the [Employment] Site Assessment scores the allocation Red / Amber for landscape character... In contrast, the [Sustainability Appraisal] scores the allocation + for landscape... such significant discrepancies only serve to undermine the robustness and objectivity of the process.'

19. The submitted supplementary SA for Central Bedfordshire Local Plan completely ignores this body of evidence, dismisses its own technical officer and relies on the promoter to deliver evidence, which is not independent. The SA offers no protection for this land, disregards the advice of the council's own studies, the valid concerns of the Inspectors and Historic England and continues to propose the allocation of 35 hectares for employment land.

LANDSCAPE ISSUES ARISING FROM THE SA

20. The Inspectors in their letter dated September 2019, concluded that *'Policy SE2 is not justified due to the harm that would be caused to the landscape character of the area.'*
21. Ridgmont Parish Council is extremely concerned by statements made in Exam 112 6.4.4 which dismisses its own Landscape Officers' assessment of SE2:
'The assessment undertaken for the employment site assessment is also undertaken by a technical specialist with an overall objective to preserve landscape, as such, it does have a particular emphasis on the negative impacts, with that being the scope of the exercise.'
22. We would suggest that is unusual as it calls into question the integrity and professionalism of the Officer and undermines any other site submitted in the Local Plan or indeed any planning application assessed by the same officer.
23. Exam 112 6.4.5 continues
'The assessment undertaken within the Supplementary SA, takes a higher-level approach to the assessment of landscape impacts and provides an appraisal of the effects of a development on a location. It is also noted that the council's assessment is not based on objectives that have been fully scoped and considered against a robust baseline, as with the SA. Therefore, the approach within the SA is considered to be a more balanced and consistent approach, rather than a restrictive approach'
24. However, Exam 115 2.34 appears to contradict the above statements. It states
'A review was undertaken of the assumptions that were used to inform the appraisal of sites against each SA objective and consideration was given to whether any changes to the assumptions should be made. The review did not identify any fundamental gaps in the evidence used to inform the SA which could have led to the identified inconsistencies and did not result in any changes to the assumptions used.'

It continues:

- 'In order to ensure that the SA is consistent with other evidence, the appraisal work for strategic sites that was undertaken previously has been reviewed and any areas of inconsistency identified have been addressed in this Supplementary SA report.'*
25. In our opinion the inconsistencies have not been addressed and appear to be no more than a scant review of alternative sites, with the intention of justifying original decisions, without objectivity.
26. Specifically, despite the issues raised at the Hearing Sessions concerning landscape we can find no change to the scoring in the supplementary SA assessment for SE2 now cores 'Green +? no sustainability constraints development acceptable' (SA Exam 115b SAO13 p 30-33).

27. Conversely, Winterwoods, which was a part brownfield site scored Green for landscape in 2017, which was later changed to Red, now scores Green +? no sustainability constraints development acceptable (SA Exam 115b SAO 13 38-41)
28. The fact that these landscapes are now judged to be the same cannot be relied upon.
29. Similarly land at Husborne Crawley, which has sensitive landscape attributes as SE2, is scored Yellow?.
30. Exam 115b Objective 13 and LUC I 67, the revised landscape assessments carried out on the sites for Winterwoods, Land at Ridgmont SE2, and the site at Husborne Crawley contain errors and unexplained inconsistencies:
- LUC I 67 in its conclusion for excluding Winterwoods from being carried forward as an allocated site in the Local Plan states that it was ‘discounted due to the identified harm that the development would have on the open countryside.’
 - SE2 also sits in open countryside: *‘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 the south and west.’* (Appendix F Full Strategic Employment Sites Assessment No 27)
 - Exam 115b SAO 13 states that SE2 is with the Bedford-Aspley Clay Vale Landscape Character type – this should read area (ref: CBC LUC 5c). Type gives a very different meaning and undermines the importance of the landscape.
 - It also goes on to state within its assessment for Husborne Crawley: *‘Despite the presence of the M1 junction, the area is part of the rural vale which provides important foreground to the Greensand Ridge at Aspley Guise.’*
 - The same applies to SE2. Despite the presence of the M1 motorway and the A507 SE2 is also located in an area which is part of the rural vale, which provides an important foreground to the Greensand Ridge at Ridgmont, Husborne Crawley, Boughton End, Woburn and Aspley Guise.
 - Exam 115b G 41 also states the higher land at Winterwoods is more visually sensitive.
 - Again, this applies to SE2 where there is *‘elevated land with attractive views to the south and west’*
 - Land at Bedford Road, Husborne Crawley was *‘identified as having landscape sensitivities that would mean the scope for development is limited’*
 - SE2 also has landscape sensitivities which were identified by the Inspectors in their letter 30th September: *‘‘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.’*
 - Exam 115b mentions that the site at Husborne Crawley (G 20) has very limited capacity for development.

- It fails to mention this for SE2, which has '*Some limited scope for development in a parcel to the west of the right of way.*' (Ref Appendix F Full Strategic Employment Sites Assessment No 27), which the Inspectors queried in Exam 69.

31. As the limitation for development does not appear in any of the supplementary SA documents it must be concluded that this has been deliberately omitted from any revised assessment of SE2.
32. There has been no independent landscape assessment of SE2. CBC has relied upon the promoter's submission Exam 106 which is merely a Scheme Comparison Document and does not address the landscape issues raised by the Inspector.

Ridgmont Parish Council engaged Kirkham Landscape Planning to conduct an independent Landscape Assessment. We would ask that this report is read in conjunction with this submission (Appendix 1).

HERITAGE IMPACT

33. Historic England has reminded CBC of its statutory responsibility to pay special regard to the desirability of preserving listed buildings and their setting, and the desirability of preserving the character or appearance on conservation areas. However, the council included the Marston Gate allocation in the Local Plan without an independent Heritage Impact Assessment of the site. Instead, the council relied upon the Heritage Impact Assessment submitted by the proposed developer of the site, which was neither independent nor objective.
34. The council has now reached a Statement of Common Ground with Historic England in January 2020; however, the statement confirms that Historic England still '*maintains its objection in principle to the allocation of Marston Gate.*'
35. We note that the Council is again relying on the site promoters' evidence with regard to providing a 'review in the context of Exam 100: Statement of Common Ground between Central Bedfordshire Council and Historic England (Sept 2019), dated 31st January 2020 and the Historic England objection in principle to SE2.'
36. We contend that the continued reliance on evidence produced by the site promoter is neither fair nor reasonable and is not independent or objective. We had fully expected the Council to commission an independent report.
37. Case Law and the Practice Guide to the NPPF establishes that the setting of a listed building is the surroundings in which it is 'experienced' and that '*the contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting.*' Moreover, the guide states that '*although views of or from an asset will*

play an important part, the way in which we experience an asset in its setting is also influenced by ... our understanding of the historic relationship between places.'

38. It is important to consider setting in this way when development such as SE2 Marston Gate, is of such a scale sufficient to have a visual impact on large areas of countryside in which multiple heritage assets lie, often visually interrelated to each other. The proposed allocation site at Marston Gate is in close proximity to a large number of heritage assets:

- **Ringwork at The Round House, Brogborough Park Farm - Scheduled Monument**
The ringwork - a medieval fortification built in the late Anglo-Saxon or Norman period - is a Scheduled Monument lying just to the north of the allocation site and is one of a limited number of such structures that survive nationally. Historic England has concluded that the allocation '*would introduce extensive modern building of a type and scale alien to the building traditions of the rural landscape which the ringwork, because of its location, was intended to command*', would '*detract from an appreciation of the ringwork's historic function*', and '*harm its significance*'.

- **Conservation Areas - Ridgmont, Husborne Crawley, Husborne Crawley (Church End), and Aspley Guise**

There are four designated Conservation Areas within close proximity of the allocation site, at Ridgmont, Husborne Crawley, Husborne Crawley Church End and Aspley Guise.

Historic England has concluded that the Marston Gate allocation would erode the rural character of the surrounding countryside that forms the vital setting to all these Conservation Areas, detracting from, the appreciation of this setting and ultimately harming the significance of the Conservation Areas. Views into and out of a Conservation Area. There are 45 heritage assets within 2 km of the site. Central Bedfordshire's conservation Policy 3 states that the Council *will: 'Safeguard important views within, into and out of the Conservation Area by resisting inappropriate development.'*

- **Ridgmont - 3 Grade II* Listed Structures & an Ancient Scheduled Monument; All Saints Church, Segenhoe Church, a Scheduled Monument, Segenhoe Manor & Malting Spinney**, Within Ridgmont lie three Grade II* listed structures: All Saints Church, Ridgmont built in 1854-5 by Sir Giles Gilbert Scott; All Saints Church Segenhoe, a ruined church with surviving walls and tower containing fabric from the 12th century is also a Scheduled Monument; and Segenhoe Manor, a Queen Anne period early 18th century country house built in the classical style. There is also a medieval moated enclosure just to the east of Segenhoe Manor, known as Malting Spinney, an Ancient Scheduled Monument. It is a fine example of a Medieval complex which includes the nearby Segenhoe Manor, deserted settlement and Church.

39. Historic England have concluded that the Marston Gate allocation would '*harm the significance*' of these assets on account of '*visual impact as well as intensification of noise and artificial light*' (**Appendix 2**).

40. Furthermore, because of the harmful impact on the setting and historic significance of these designated heritage assets, Historic England considers the development of the Marston Gate allocation site *'would not achieve the NPPF's overarching aim of promoting sustainable development'*.
41. Historic England has affirmed that even if the scale of the development were to be reduced to remove the views from Segenhoe Manor, they remain *'unconvinced this would remove the impact on the conservation areas and in particular on Brogborough ringwork therefore find the proposed allocation is not justified nor consistent with national policy under paragraph 35 of the NPPF'*.
42. Two of the key issues identified by Central Bedfordshire regarding Heritage Assets are:
- The need to protect and enhance the large number of designated heritage assets in Central Bedfordshire.
 - The need to conserve and enhance both designated and non-designated heritage assets and the contribution made by their settings.
43. In Exam 115b A 23 it states
Importantly, the Local Plan and SA can consider the cumulative effects of proposed development on both designated and non-designated heritage assets and their setting.'
44. In reading the Exam 115, 115b we contend that Central Bedfordshire has taken a very narrow view of setting in which Heritage assets lie. Historic England are quite clear on this point:
'This involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value. Whilst a useful starting point, a focus on distance or visibility alone as a gauge is not appropriate. An allocation at a considerable distance away from a heritage asset may cause harm to its significance, reducing the suitability of the site allocation in sustainable development terms. (Appendix 3)
45. Central Bedfordshire has chosen an arbitrary distance by which the effects on Heritage Assets are measured. This is not acceptable or appropriate given the guidance from Historic England:
'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'
46. Historic England in their letter dated 24th August 2018, in response to the scoping report for Prologis planning application gives very clear guidance to Central Bedfordshire Council. It states:
'Historic England are concerned that the proposed study area is too limited given the scale of the development proposed. This does not appear to be specifically defined but seems to be c1. Kilometre

given the small number of designated heritage assets mentioned in the Archaeological and Built Heritage section'

47. Historic England's desk top study indicated that there are '45 designated heritage assets within 2km of the proposed development boundary.' (**Appendix 4**).
48. In the Assessment of Effects produced in Exam 115b, Central Bedfordshire remains focussed on a measured distance of 1km as the definitive tool for assessing the impact of the development on heritage assets.
49. When comparing Land at Bedford Road Husborne Crawley, Land at Ridgmont SE2 and Winterwoods (cf: G 17-20, G30-33 G38- 41). The assessment of the Historic Environment (SA14) contains omissions, inaccuracies and inconsistencies in its judgement:

Ridgmont SE2 (G33)

- For SE2 it states there are limited assets in the area, which is incorrect.
- Ridgmont is a Conservation Area
- Ridgmont is 500m from the site not 1km as is being suggested
- It has 22 listed buildings
- All Saints Church Grade II* in Ridgmont is 800m from SE2
- Segenhoe Manor is 1.2km
- All Saints church Segenhoe 12th century building [ruin] Grade II* and a Scheduled Monument is 1.3 km.
- Brogborough Ring works, which lies in the Parish of Ridgmont, a scheduled monument is 1km from the site, but mentioned as merely being north of the motorway.
- Malting Spinney an Ancient Scheduled Monument lies 1.4 - 1.5 km.
- Ridgmont Station Grade II is within 50-75m, however it is merely mentioned as a listed building adjacent to the south of SE2, as if it is of no significance.

Husborne Crawley (G20)

- Husborne Crawley is a Conservation Area
- It has 23 listed buildings.
- There is no mention of St James Church Grade II* which is 1.5km
- There is no mention of Crawley House Grade II* which is 1.6km
- Husborne Crawley is noted as being 650m from the site, we contend that it is actually further away than Ridgmont.

Winterwoods (G38)

- is not in a conservation area
- the site is partly brownfield
- It has 3 Grade II listed buildings and 1 Grade I listed building
- greater weight is given to Grade II listed buildings than is given to the multiple Grade II listed buildings in Ridgmont and Husborne Crawley specifically Ridgmont Station Grade II, which will be hugely impacted by SE2

50. In the revised SA assessment for Historic Environment, Husborne Crawley and Ridgmont score Blue 0 and Winterwoods scores Yellow-? SE2. The conservation areas of Ridgmont and Husborne Crawley with their multiple heritage assets are presented by Central Bedfordshire as having little significance.
51. There is a statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.
52. Central Bedfordshire appear to be ignoring this statutory duty with regard to Ridgmont, Husborne Crawley and Aspley Guise conservation villages.
53. We contend that the allocation of SE2 runs contrary to Central Bedfordshire Policies EE5, EE6, EE13 and EE14, as amended in response to issues raised by Historic England.
54. We consider that scant regard has been given by Central Bedfordshire in the supplementary evidence to the requirements of the NPPF, in particular paragraph numbers 7, 8, 189, 193, 194, 196 and 200.
55. This is a large-scale development in open countryside and as a warehouse and distribution centre it will operate 7 days a week, 24 hours a day with all the attendant vehicle movements, lighting and pollution.
56. Historic England still maintain their objection to this allocation. (Exam 100 Statement of Common Ground).

EXAM 106

Prologis Park Marston Gate Expansion Scheme Comparison Document

57. Exam 106 sets out to demonstrate the changes to the proposed modified development parameters for the Marston Gate Expansion site and to compare them with those in the submitted scheme and to outline additional measures that have been developed to further mitigate the proposed development on the allocated site and address the concerns regarding landscape and heritage assets.
58. The Inspectors in their letter dated 30th September drew attention 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.'

59. We have reviewed Exam 106 prepared by Barry Chinn Associates in some detail. We do not consider that the visual assessments provide an accurate appraisal of the landscape and visual effects on heritage assets for a number of reasons.
60. There is no reference to an assessment of landscape in Exam 106. Therefore, it fails to address the issues raised by the Inspectors. Furthermore, there is no reference to the following:
- Topography of the site – Fig 8 gives a false impression that the height of the new buildings will be the same as the existing taking no account that the ground rises up to 100m – 105m AOD.
 - It fails to mention that the development is situated on rising ground at the foot of the Greensand Ridge and the size mass and scale of the buildings would be harmful to one of the defining landscape characteristics of the area.
 - The landscape is not flat as is being presented. The site requires a massive amount of levelling hence the conical shape as the spoil is not going to be removed and will be used to form a conical hill on the easterly side of the site, which is the highest point on the site.
 - The conical shape will be an incongruous feature in the Greensand Ridge landscape
 - The topography of the site is being skewed by the presentation which is 1D and not modelled
 - The mitigation offers a limited amount of planting, which is inadequate and will have limited benefit at the very best to just one or two views amongst the plethora of views from sensitive public and heritage locations.
 - Footpaths – there is no mention of the significant visual impact on the development would have on the network of historical public footpaths, some of which may be quite ancient. The Ramblers are very concerned about the impact of the warehouses on the footpaths and their amenity (**Appendix 5**)
 - It fails to address Historic England’s concerns that mitigation will not avoid harm.
 - It also fails to address local communities, and Historic England’s significant concerns of light and noise

Exam 106 photomontages

61. Ridgmont Parish Council has carefully examined the photomontages and our comments are as follows:

62 The photomontages are misleading with the purpose of justifying that there will be no harm to the landscape.

63. The photomontages appear to take no account of the topography of the site and the plateaus that will be created, which will add to the height of the buildings. Figure 9 shows the development to be at the same height as the existing Marston Gate, which is misleading.

64. The photomontages are selective and ambiguous with the purpose of justifying that there will be no harm to the landscape. Sensitive views submitted in 2017/18 have been omitted. Very few illustrations have been produced from the south east of the site at Boughton End

65. The majority of viewpoints submitted are from the south west and only 2 have been taken from the north east.

66. The use of the colour blue to highlight the reduced height is unsatisfactory. The colour has been chosen because it blends into the skyline, which gives a false impression i.e.: Fig 5&6 and 27&28.

67. Filters appear to have been used to:

- fade the blue lines into the background making it hard for the viewer to discern the lines, cf: Fig 6,8,12,20,26,28
- create more muted tones cf: Figures 42,43,44,45,46

62. Fig 7 and Fig 8 there seems to be a discrepancy on the heights between the red and blue. The blue line for Fig 8 appears much lower and is taken from the height of the existing buildings without considering the topography of the ground.

63. In Fig 13 lines are missing – they do not extend as in Fig 12.

64. Fig 18 additional lines have been added.

65. In the photomontages, there is no indication of how the building height parameters were drawn or calculated? The reference points are unclear.

66. We have carefully studied the photomontages and contend that a reduction in height of 3m will make no discernible difference to the harm the buildings will have on the landscape and heritage assets.

67. We note that the proposals to mitigate the site include the following:

Height

- Reduction in height of warehouses by 3m (10 feet) will not reduce the impact on the setting of Segenhoe Manor Grade II*; All Saints Church at Segenhoe Grade II* and Scheduled Monument; Maltings Spinney a Medieval moat and Ancient Scheduled Monument is at a high point in the landscape; All Saints Church Ridgmont was built by Sir George Gilbert Scott and is Grade II* with the spire being seen for miles. St James Church Grade II*, Crawley Park Grade II* in Husborne Crawley, and the conservation areas of Ridgmont, Husborne Crawley and Aspley Guise. Issues of light pollution will remain and have not been dealt with in the SA.

Scale

- The scale of the development has not been reduced. The number of hectares remains the same despite the agreement between CBC, Inspectors, HisE and other contributors - limited scope for development - small scale development parcel to the west of the right of way, agreed as the John Bunyan Trail.

Colour Palette

- The colour palette is not a concession. It is merely good practice. Given the scale and size of the buildings the colour will not enable the buildings to blend into the landscape, or screen them from view. No matter what colour the outside of the buildings are they will still register as a box. The colours that are being put forward are not a new phenomenon. They were suggested in Exam 70 and in the planning application.

Mass

- The mass of the site has not changed. Whether there are 8 buildings as shown on Fig ? or 3 as in the planning application, these buildings are simply large boxes (varying dimensions obviously) but they all do the same thing; build the cheapest building that holds the most stuff!

Roof design

- The roof design is not new and was put forward by Prologis in November 2018. It will not make any difference to the overall impact of the buildings. They will still appear as huge boxes in open countryside in the Greensand Ridge Country Landscape.

Planting

- The new offsite planting will not screen the impact for Segenhoe Manor or the High Street, which is being suggested. The current bank of trees is over 10m - 12m tall, and were planted 25 years ago, the current Marston Gate is at a low point in the valley and clearly visible from the second floor.
- Trees of 4m - 6 m high will not be an effective screen for buildings of 15m -18m high. There is no amount of mitigation to counteract the impact of the size, mass and scale of these buildings.
- In the winter there will be even less coverage.
- Less coverage in the darker hours.
- Light pollution will filter through - the development operates 24 x7.
- Darkness hours - there will be less coverage.
- Light pollution will filter through - operational 24x7.
- Off-site planting like this is unusual with reliance on a landowner.

68. With regard to the planting mitigation proposed we have major concerns:

- The proposed bunding in the eastern area of the site which will be to a **minimum** of 2m in height is also the highest part of the site at 100m -105m AOD.
- This creates an incongruous conical hill sitting within the Greensand Ridge landscape, because the soil is too expensive to remove from the site and the enormous amount of earth being dug up to create plateaus for the warehouses.

- Public footpaths will still have clear views of the development for example: Malting Spinney, a Medieval moat, Greensand Ridge Walk as it crosses the A507, at Lowhill Plantation and at Lydds Hill.

69. Appendix 115b A-20 states that

'A key aspect identified as contributing to landscape character is the presence of significant and far reaching views particularly due to areas of flat topography. As such, there are concerns over the potential disruption of significant views, including through the alteration or cluttering of skylines and common development concealment techniques like bunding. This indicates a need to monitor the height of new development throughout the rural area and protect significant views where appropriate. Key guidelines therefore refer to retaining the open, level qualities of the landscape avoiding incongruous bunding.'

Clearly this should apply to SE2 and the Greensand Ridge landscape character.

70. Historic England has concluded that the Marston Gate allocation would *'harm the significance'* of these assets on account of *'visual impact as well as intensification of noise and artificial light'*.

71. Furthermore, because of the harmful impact on the setting and historic significance of these designated heritage assets, Historic England considers the development of the Marston Gate allocation site *'would not achieve the NPPF's overarching aim of promoting sustainable development'*.

72. Historic England has affirmed that even if the scale of the development were to be reduced to remove the views from Segenhoe Manor, they remain *'unconvinced this would remove the impact on the conservation areas and in particular on Brogborough ringwork therefore find the proposed allocation is not justified nor consistent with national policy under paragraph 35 of the NPPF'*.

73. We also note that BCA have stated that Segenhoe Manor does not have an historical association with the landscape. We contend that this is a false statement. Segenhoe Manor, Brogborough Manor and the Round House are interlinked. In Volume III of *The Victoria County History* for Bedfordshire published in 1912 shows that the histories of manors in Ridgmont and Brogborough are intertwined given Walter, brother of Sihere owned a manor of ten hides as recorded by the Domesday Book of 1086. It is from this manor that all the medieval manors in Ridgmont (Segenhoe) and Brogborough stem.

74. We are aware that Thomas Potter MP of Segenhoe Manor owned land that was adjacent to SE2 in 1797. In 1833 his estate extended to 420 acres, which included the historic park land at Segenhoe. The estate would have enjoyed a wide rural vista, therefore SE2, because of its proximity to the estate would have formed part of the setting of Segenhoe Manor. The landscape changed in 1958 with the advent of the M1 motorway, when the gatehouse to Segenhoe Manor was demolished.

75. We note that in Exam 117 the mitigation proposed by the developer in Exam 106 is to be adopted as policy by Central Bedfordshire Council. We believe that it is not reasonable or

appropriate for a Local Authority to place such weight on a developer's mitigation proposals that they become accepted policy without scrutiny.

76. Specifically, we have no doubt that even with the policy wording should the allocation be approved the developers will change the application, in particular the design, layout and height. In Exam 109 Appendix B by Aspinall Verdi their analysis;

'has shown that although access to the UK strategic road network remains important, technology is also driving occupier requirements which are leading them to require:

- i. Lower site coverage (reduced from 40% to 30%).
- ii. **Higher eaves (up to 20 metres) to accommodate mezzanine floors or multi-level units and use of drones.**
- iii. Sufficient power and digital capacity for both units and vehicles.
- iv. Access to skilled labour.

77. Therefore, if occupiers' requirements are specific on higher eaves, a reduction in height by 3 metres would not be attractive. We are concerned that Prologis will state that the buildings will not be attractive to prospective occupiers and therefore request the height be revised upwards. Why offer a reduction of height when market research shows occupiers want higher eaves?

78. We contend that the Inspectors key concerns have not been overcome by the proposed changes in Exam 106.

EXAM 112

79. The Inspectors set out their concerns regarding SE2 in landscape and visual terms under Exam 69 paragraphs 12/13 and 49/53. The concern focussed on the adverse landscape and visual effects, and there were severe discrepancies in the Council's supporting landscape evidence and in the effects of the development.

80. Regarding the nature of the development the Inspectors highlighted the following:

- *The prominence, size and type of development*
- *Its appearance*

83. 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*

84. 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.

85. In reaching their conclusions Exam 112 and Exam 115 rely on Exam 106, which has been produced by the promoters and is merely an exercise in assessing selective viewpoints and a description of mitigation proposals, which do not address the substantive issues raised by the Inspectors.

86. Using the same paragraph numbers as Exam 112 contains misleading statements, inaccuracies and omissions. We comment as follows:

6.4.4 We find it strange that this is the only employment site where the Council call into question the view given by their landscape technical officer.

6.4.5 We find this statement misleading as the 'higher level of approach to the assessment of landscape impacts' and the 'appraisal of the effects of a development in a location', as the Supplementary SA relies on Exam 106 carried out by Barry Chinn on behalf of the site promoters Prologis, which cannot be relied upon; their so-called factual analysis remains inconsistent and incorrect. There is no other supporting evidence to address the Inspector's concerns regarding SE2.

6.4.6 We find this perverse. How can a huge development of warehousing contribute to creating high quality green infrastructure and landscape regeneration? The Greensand Ridge is one of the defining landscapes in Central Bedfordshire about to be regenerated by huge sheds painted green!!

6.4.7 Error – the site is within the Salford -Aspley Clay Vale Landscape Character Area not type as is being suggested which gives lesser weight to the landscape.

6.4.10 The green infrastructure that is currently enjoyed and which benefits the health and mental well-being of communities both local and national sits in the Vale of the Greensand Ridge in open countryside with a network of historic and important footpaths and bridleways. The SA assessment makes no mention of the impact the development will have on the openness of the Vale or on the footpaths, which are to be re-routed around the

perimeter of the development and through the site itself. (Appendix 2 Letter from Ramblers)

6.4.11 This statement is misleading – the bus services are not frequent. Ridgmont does not enjoy a reliable bus service. The much-lauded East West Rail network will only offer 2 services an hour and the service will only operate from 6am – 10pm. The line is not going to be electrified, as was previously anticipated. It is unlikely that most of the employees will not be local and therefore the train service is limited. It is probable that people will use private motor car.

6.4.12 Where is the evidence for this sweeping statement? Warehouses rely on lorries for distribution, which are diesel and huge air polluters. The site is near the M1 J13 which is already a hotspot and will add to traffic. CBC has never measured the air quality at Junction 13 or in Ridgmont. How will geodiversity and biodiversity be enhanced when habitats and the ecology of the area are going to be destroyed to make way for warehouses? How is the Greensand Ridge Landscape protected and enhanced?

6.4.14 Currently all agricultural land should be valued and not judged or dismissed on grading. Lesser grade quality soils can be improved.

6.4.15 This statement is incorrect and misleading. It fails to support its own evidence. In the SA 115 G20 it states numerous listed buildings are also located within Husborne Crawley conservation area to the south of the site within 650m. It understates the number of heritage assets within the parish of Ridgmont. Ridgmont conservation area is 500m from the development site and has 22 heritage assets contained including a Medieval moat at Malting Spinney, an Ancient Scheduled Monument; All Saints church Segenhoe, Grade II* and Scheduled Monument; All Saints Church Ridgmont Grade II* is 800m from the site; Segenhoe Manor, a Queen Anne Manor House, Grade II* 1.2km from the site; and Ridgmont Station Grade II is 50m away. By comparison, Husborne Crawley has 23 heritage assets present, including St James Church Grade II* [1.5km from the development site] and Crawley Park House, which is also Grade II*.

6.4.17 Exam 112 makes no mention of the fact that 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. It was agreed and identified at the Hearing Session that limited scope referred to a parcel of land to the west of the John Bunyan Trail.

6.4.21

- Multi barrelled vaulted roof profiles is not a new suggestion as is being marketed. This was detailed in the planning application in 2018.
- Colour banding was also put forward in 2018 and is good practice.
- Off-site planting inadequate – there are no guarantees that the land will be maintained.

6.4.27 It states that modifications would be proposed in line with the Statement of Common Ground as agreed with Historic England and reference is made to Ridgmont Station.

' Appropriate measures should be taken to ensure the proposals take full account of the potential arising from proposed improvements to Ridgmont rail station, to maximise sustainability and sustainable transport options. Proposals will provide commensurate contributions towards enhancing the infrastructure at Ridgmont Railway Station, including public transport infrastructure facilities and car parking facilities. Proposals should also be accompanied by a strategy to address the increased use of the Ridgmont Level Crossing. '

We have read Exam 7J and Exam 100, but we can find no reference by Historic England to Ridgmont Station, as stated above.

ALTERNATIVE SITES

87. Central Bedfordshire maintains that it has carried out a robust and higher level assessment of alternative sites, but we contend this assessment is neither robust or accurate, but merely an exercise to justify previous decisions.

88. In order to understand any changes of the revised SA Exam 115b of alternative sites assessment it was necessary to refer to the previous Full Strategic Site Assessments Site Appendix F.

Land at Husborne Crawley

Landscape

Appendix F 2b 27 - the site scored Red 'very limited capacity for Development - despite presence of M1 junction, this is a rural vale important as the foreground to the Greensand Ridge at Aspley Guise. Large scale building e.g. B8 would be unacceptable - development would block key views to Greensand Ridge. Important that open views are maintained from Brogborough Hill. Site contributes to the openness of the Vale. Views from M1 and railway important. Any built form would need to be small scale.' In Exam 115b it scores Orange?

Heritage and Archaeology

Appendix F 2b 28 - the site scored Amber, there was no mention of the conservation area or the listed buildings. In Exam 115b it scores Blue 0

Land at SE2 Ridgmont

Landscape

Appendix F 2B 27 - Scored Red/Amber for landscape '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.' In Exam 115b it now scores Green+?

Heritage and Archaeology

Appendix F 2b 28 the site scored Amber, there was no mention of the conservation area or the listed buildings. In Exam 115b it scores Blue 0

Land at Winterwoods

Landscape

Appendix F 2b 27 the site scored Amber/Green 'Farmland forms setting for historic villages and foreground to Brogborough Hill Scope for wooded integration of development..... Land is open with gentle slopes rising from valley. Higher land is more visually sensitive. Important to maintain rural character....' In Exam 115b it now scores Green +?

Heritage and Archaeology

Appendix F 2b 28 the site scored Amber for Heritage and Archaeology, there was no mention of the listed buildings. In Exam 115b it now scores Yellow -?

89. With regard to SE2 we note that despite the issues raised by the Inspector in Exam 69 concerning landscape we can find no change to the scoring in the supplementary SA assessment for SE2. It scores 'green +? no sustainability constraints development acceptable' (SA Exam 115b SAO13 p 30-33).
90. Conversely, Winterwoods, which scored Green for landscape in 2017, which was later changed to Red, now scores green +? no sustainability constraints development acceptable (SA Exam 115b SAO 13 38-41)
91. Furthermore, with regard to SE2 we note that despite the serious issues raised by Historic England at the Inquiry concerning heritage assets we find that the scoring has changed from Amber in 2017 to blue 0 (SA Exam 115b SAO 14 p 30-33)
92. Conversely, Winterwoods, which scored Amber for heritage assets in 2017 now scores yellow-? (SA Exam 115b SAO 14 p 38-41) and is being discounted in the revised SA due to the number of listed buildings.

93. We consider that the evidence provided in Exam 115, 112 and Exam 115b is flawed, less robust than is being suggested and is weighted in favour of allocating SE2 as an employment site.
94. By omitting an independent landscape and heritage impact assessments for Policy SE2 it is unjustifiable to suggest a lesser degree of importance than in fact would be the case.
95. We consider that the landscape and heritage impact are the most important reasons why the Marston Gate allocation is unsound, cannot be justified and should be removed from the Local Plan. However, there are significant additional reasons why the allocation should also be removed:

EXAM 114

Ridgmont Parish Council engaged Wormald Burrows to conduct an independent Traffic Assessment. We would ask that this report is read in conjunction with this submission (Appendix 6).

96. M1 Junction 13 is defined as a traffic 'hotspot'

At the Examination last summer, the Planning Inspectors identified substantive issues with the soundness of the Local Plan, and in particular the cumulative effects on M1 Junction 13 from the proposal for 5,000 homes in the Marston Vale, Policy SE2 Expansion of Marston Gate, the expansion of Milton Keynes and Bedford along the A421 and Covanta. They subsequently asked CBC to review the assessment of the cumulative impact of traffic on local roads; and establish whether effective mitigation of traffic congestion at M1 Junction 13 is actually feasible. Currently, CBC and Highways England have reached a statement of Common Ground, however we remain sceptical that the modelling solutions put forward will overcome the cumulative effects of increased traffic at Junction 13.

97. Junction 13 is already overloaded and whilst we understand that CBC have chosen this site because of its location to Junction 13 we fail to understand why it makes sense to continue overloading the Junction. We would remind CBC that warehousing is footloose and can be sited anywhere. Wixams has just built B8 warehousing which is 13 minutes from Junction 13.
98. Exam 114 concludes that the increase in traffic can be sustainably managed via mitigation to Junction 13 of the MI and by the committed dualling of the westward link of the A421. But there are substantial increases in traffic on other routes particularly A507, which will be further affected by increased traffic from SE2. These are not visible in the strategic modelling within the submitted Local Plan or addressed by Exam 114.
99. The development of the site would worsen congestion on the A507.
The Marston Gate allocation site would be accessed from the A507, a key east-west route across the district. The council already expects the A507 to experience 'high levels of congestion' by 2035, even without the allocation; and although the council is undertaking a study of the A507 to

identify ways that the congestion problems can be alleviated, no modelling or potential solutions have been devised as of yet to address them

100. There is nothing we have seen which would provide confidence that this development could demonstrate those levels of modal shift from cars and onto public transport, cycling or walking. Bus services are infrequent and cycles lane to Ridgmont would require access to land which neither the developer nor the Council control. The existing train service – does not go to where people travel to work (with the exception of Bedford) and at one train an hour in each direction does not support daily commuting involving connections at Bedford and Bletchley. That new train service of East West rail will not be an electrified line and will only increase the service to 2 services an hour beginning at 6am in the morning until 10pm at night, which will not suit shift patterns of working.
101. Even if some meaningful modal shift could be achieved, there would still be significant increased traffic using local roads to access other routes and destinations.

EXAM 109 EMPLOYMENT

Ridgmont Parish Council is not objecting to job creation or employment, we are objecting to the allocation of warehousing in a wholly inappropriate site.

102. Exam 109 tests two scenarios for warehousing, provide land for warehousing or provide no land for warehousing. No reason is set out on economic necessity for this location. Employment in Central Bedfordshire and Milton Keynes is high with few looking for work. If a demand is to be provided then the site at New Farm Spring Farm Biggleswade or Winterwoods perform better in terms of causing less landscape harm. No economic need is being driven by the labour supply or demand. It is not the case the employment is needed as a result of further or new housing allocations. The PPG makes it clear these are key drivers to seeking such warehousing allocations and in this case the employment is not required.
103. We have carefully read the Exam 109 and do not feel the Council's identification of the logistics and distributions sector as one of the priority sectors to target for additional employment is justified (para 12.1.8)
104. In total 140ha have been allocated to B8 warehousing which is totally excessive and unnecessary. Warehousing takes up a considerable amount of land compared with the number of jobs generated.
105. Lichfields for Prologis originally estimated it will provide 2,000 jobs, this has now been reduced to 1,700 and CBC seems to have accepted this revised figure as fact. The function of the proposed warehouses and distribution centre is unknown, and we would ask for the evidence base to support the figure quoted as fact.
106. Furthermore, from the Councils' own evidence occupiers are requiring higher eave heights to accommodate automation in warehouses and distribution centres to cut labour costs. Therefore,

the number of jobs predicted may not reflect a more realistic number given the trend in warehousing toward automation.

107. The majority of the jobs created by the sector are low skilled and low paid. Employees are usually shift workers, low paid. From our experience with the high cost of housing locally these are not the sort of jobs that will be filled by local people.
108. The jobs follow the current pattern of employment at distribution centres and are filled by people from a 50 mile radius and beyond. At a consultation session, CBC admitted that the definition of local is 'any distance someone is willing to travel' and 'we can't force local people to take the jobs we supply'. It is therefore misleading to suggest these jobs are for local people.
109. Warehousing and distribution centres are footloose industries and by default can be sited anywhere. Developers and occupiers will consider sites over a wide radius.
110. In addition one of Central Bedfordshire's core objectives, which run through the Plan is to prioritise the use of brownfield sites. Winterwoods, which has been discounted in the revised SA is a part brownfield site.
111. Our concern is this allocation, which has been identified for logistics and distribution, is in an extremely sensitive location. Policy SE2 immediately abuts the Greensand Ridge Nature Improvement Area. Central Bedfordshire sits on the board of Trustees for the Greensand Country Landscape Partnership, which is committed to improving and promoting the Greensand Country to raise awareness of the heritage value of the landscape and to reverse the gradual decline in the distinct landscape character of this beautiful and loved place. The vision is that by 2020 the Greensand Country will be a living and working landscape that is cherished and used by present and future generations.
112. The further expansion of Milton Keynes proposes large-scale allocations of warehousing and distribution centres, which we believe would satisfy this demand. Without placing warehouses at the gateway to Central Bedfordshire.
113. Exam 109 has illustrated that Policy SE2 is an allocation that the council does not need to make - it is not required economically or for reasons for economic growth.
114. Exam 109 identified more appropriate sites at Junction 11a Dunstable and Biggleswade A1M.
115. Since the hearing session in June 2019 2 new B8 warehouse sites have been granted planning permission at Junction 13 opposite the current Marston Gate; DC10 and Dawson. These were brownfield sites, and therefore materially different to the proposal SE2 and its green field nature in a valued landscape.



116. We contend that Junction 13 does not need warehousing to spread beyond the buffer of the railway line into the open countryside of the Greensand Ridge.

117. The development of the site will increase air pollution

In view of the high level of importance that the Government has given to climate change, and the responsibility placed on Local Authorities to reduce air pollution in their areas, Policy SE2 appears to ignore the cumulative impact of an increase in HGVs and associated traffic, which will have huge consequences for local people and for future generations

118. Traffic congestion at Junction 13, Mill Road, A507 will lead to breaches in air quality and public health. Ridgmont Parish Council has no confidence that the traffic impact can be sustainably managed. It is a continued failing that no assessment of air quality has been carried out and therefore the allocation cannot be considered as sound.

119. The development of the site will increase noise pollution.

Any increase in traffic means an increase in noise. Whilst it is accepted that there is noise from the M1 and A507 the SA assessment underplays the extent to which the area would be subjected to an increase in noise volume from the additional traffic flows from the proposed development.

120. The development of the site will increase light pollution

- This development will significantly affect the settlement areas of Ridgmont, Husborne Crawley and Aspley Guise. It will increase urbanisation into open countryside with associated light pollution. The current industrial area has a visual presence in the night sky.



the night sky from Ridgmont

- Historic England have concluded that the Marston Gate allocation would *'harm the significance'* of a number of heritage assets on account of *'visual impact as well as intensification of noise and artificial light'*.
- The light pollution emanating from a warehousing and distribution centre operating 24x7 will affect the identity of the area. The current Marston Gate emanates light pollution. It is to be noted that the M1 motorway is not lit from Junction 10-13 at night (only at the exit points)
- While the night-time visual impact is already compromised by the motorway and existing industrial park, the expansion of Marston Gate would significantly increase light pollution and increase its visual presence in the dark landscape. Interactive Maps of Light Pollution and Dark Skies has shown that Prologis Marston Gate is the highest ranking, which is >32 NanoWatts/cm²/sr, which is the brightest on the scale.
- It is a continued failing that no assessment of light pollution has been carried out and therefore the allocation cannot be considered as sound.

121. We can find no reference to the impact of light, air and noise pollution within any of the additional SA documents produced by Central Bedfordshire which addresses these issues. No evidence has been produced on the impact of noise, air and light pollution.

REMOVAL OF POLICY SE2: M1 JUNCTION 13 - MARSTON GATE EXPANSION FROM THE CENTRAL BEDS LOCAL PLAN

122. Recent developments around Junction 13 over the last 20 years – including the existing Marston Gate distribution park and the new A421 dual carriageway – have kept to the west of the Bletchley-Bedford railway line. The location of these developments recognise that the railway line is an obvious and important limit to built development, preventing the encroachment of buildings into an important area of open countryside that forms the setting of the Greensand Ridge and important heritage assets.
123. At the same time, studies undertaken by the council and its predecessor studies over the last 20 years have confirmed that the landscape east of the railway line should be protected from development.
124. The council's intention to allocate the Marston Gate expansion site in Local Plan Policy SE2 completely ignores the council's own evidence base warning of the site's importance to the local landscape; it is opposed by Historic England for its impact on several designated heritage assets
125. Ridgmont Parish Council has therefore carefully considered the revised SA and supporting technical documents, we have found the repetitions of the same argument, the many inconsistencies, omissions and the over-use and misuse of the key planning concept 'sustainability' distracting. Upon any view this is an application for permission to effect a major change to an important area of Greensand Ridge countryside and will impact a large number of heritage assets in nearby conservation areas.
126. The submitted SA for Central Bedfordshire Local Plan offers no protection for this land, disregards the advice of the council's own studies, and proposes the allocation of 35 hectares for employment land. The decision to allocate appears to be completely at odds with the evidence available.
127. The Sustainable Appraisal and Appendices are not properly considered, not sound, nor objectively prepared. The additional documentation appears rushed and the site assessment of SE2 has relied upon the evidence of the promoters which is not independent, nor carried out fully and correctly. There are several inaccuracies and conflicts contained within Exam 115, Exam 112 and Exam 106. This is further evidenced by the fact that any changes and additions to the documents intend to be made during the planning stage, making it impossible to properly consider and respond to the consultation.
128. We have failed to find any transparent or robust comparative assessment to show why the Winterwoods site is not being carried forward, when the Prologis site would have far greater and more significant harm on the huge number of heritage assets within a conservation area, as well as substantial landscape and visual constraints.

129. Scant reference is made in the SA to air quality and CO₂ emissions and there is only a weak link made to trees as countermeasure to the latter; the Plan as it stands proposes the destruction of both old and new tree plantations. Specific concerns are expressed about air quality in named urban areas, yet the plan proposes to develop large urban areas of employment, which will exacerbate the problem of air quality, whilst a larger number of small and medium sized dispersed developments would more likely alleviate it. Logistics activity will increase the level of HGV freight movements by road into and out of the sites, thereby increasing air pollution. (Ref: NPPF110).
130. Token references are made to agricultural needs and soil – the very basis of Bedfordshire’s employment across the ages. With climate change, the potential severing of current trade links with Europe and on-going financial uncertainties associated with both, all suggest that within the foreseeable future, the UK may struggle to feed its population and land once built over cannot easily be returned to food production. (Ref: NPPF 112).
131. Exam 115 fails to put in place robust and proper safeguards to protect and conserve the nature of Central Bedfordshire’s rural villages and their environs. (Ref: NPPF 170). By allocating Policy SE2 little regard has been given to safeguarding the intrinsic character, scenic beauty and perceptual qualities of the landscape such as tranquillity.
132. The Inspectors’ key concerns have not been overcome through the proposed changes in EXAM 106 and have not been demonstrated in either EXAM 112 or EXAM 115:
- The assessment of the proposed Prologis Marston Gate strategic employment site has failed to adequately consider the impact on the landscape, the number of heritage assets and the conservation areas of Ridgmont and Husborne Crawley
 - Exam 115 and Exam 112 rely on Exam 106, evidence put forward by the promoter, which is fundamentally flawed, and not independent. Exam 106 would have been undertaken by a technical specialist with an overall objective to promote the allocation, as such, it does have a particular emphasis on positive impacts, with that being the scope of the exercise
 - 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
 - Historic England still maintain their objection in principle to SE2
 - Footloose demand is not a requirement specific to Central Bedfordshire and does not necessarily have to be met by this Local Plan.

133. Given the emphatic conclusion of the Inspectors in their letter, it would surely be the most prudent course to remove Policy SE2 from the Local Plan.

CONCLUSION - POLICY SE2

134. For reasons that we have stated the allocation of Policy SE2 is not based on objectivity in the Revised SA. On the basis of the evidence submitted by Central Bedfordshire Policy SE2 is unsound.

135. The basis for Central Bedfordshire's allocation of Policy SE2, as a strategic employment site is inconsistent and cannot be justified. Exam 109 report show there is adequate supply of employment land to meet the needs of the plan

136. In addition Exam 115, 112 and 106 have failed to consider the major landscape and visual constraints on Policy SE2. And are inconclusive, incomplete and inaccurate and therefore the Inspector's very significant concerns have not been addressed and the allocation is not justified.

137. This is one of the key landscapes in Central Bedfordshire, the important and highly valued Greensand Ridge country with its numerous footpaths, bridleways and cycle paths. It is a continued failing that no independent landscape assessment has been carried out and therefore the allocation is inappropriate in its location and scale, is not justified, nor sustainable.

138. Furthermore Exam 115, 112 and 106 have failed to consider the significant number of important heritage assets and their constraints on Policy SE2. Historic England's concerns have not been addressed and the heritage assessment submitted is not independent. The heritage assessment in the SA is inconclusive, incomplete and inaccurate and therefore the allocation cannot be justified.

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

140. It is considered for these reasons SE2 is not justified or sound and should be deleted.

We wish to take this opportunity to advise that the Parish Council and the appointed. Consultants wish to speak at the subsequent hearings, and would appreciate notification of the date as soon as possible.

Yours sincerely

Maria Spearing
Chair
On behalf of Ridgmont Parish Council