



# The Greensand Trust

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**By email only.**

15<sup>th</sup> March 2023

Dear Sir/Madam,

## **Re: Central Bedfordshire Design Guide SPD consultation**

The Greensand Trust exists to protect and enhance the landscape, biodiversity and historic heritage of the Greensand Ridge and surrounding areas. For over a decade it has been leading on the **Greensand Country Landscape Partnership**, a multi-partner initiative which secured over £1.6m of National Lottery Heritage Fund Investment and £1.5m of partner investment to raise the profile of the area as a much-loved landscape, and drive forward initiatives that protect and enhance it. This investment was secured partly because it was recognized that the area has suffered from poorly planned development, which will undermine the ability to promote the area as a cherished landscape and engage people with it.

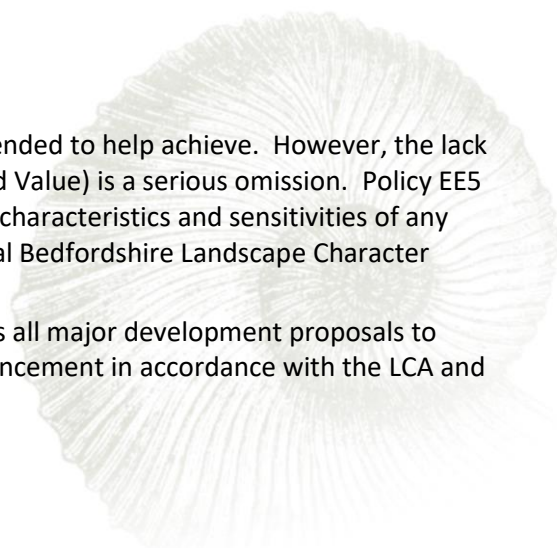
We welcome the revision of this document, a necessity in this area where development pressure can be high.

The overall approach to the SPD is limited by its ability to state facts but not offer further guidance around priorities in terms of enhancing the landscape or streetscape. As the Greensand Country area covers a large proportion of the CBC area, we feel that the Greensand Country area should have its own SPD to guide development in a way that supports our objectives around protecting and enhancing the landscape, wildlife and heritage, ensuring its unique character and 'sense of place' are central to decision-making. We would welcome the opportunity to explore this opportunity with the authority.

Our specific comments are as follows:

### **Section 4: Introduction:**

- Section 4 sets out the raft of policies this SPD is intended to help achieve. However, the lack of reference to Policy EE5 (Landscape Character and Value) is a serious omission. Policy EE5 requires all development to have regard to the key characteristics and sensitivities of any proposal site and its setting, as set out in the Central Bedfordshire Landscape Character Assessment.
- Policy EE5 is also important to support as it requires all major development proposals to demonstrate how they incorporate landscape enhancement in accordance with the LCA and



Design Guide, and other relevant documents including those relating to the Greensand Ridge Nature Improvement Area.

### Section 5: Context and Identity:

- 5.1.4: We welcome reference to Greensand Country but suggest this also references the 'Greensand Ridge NIA'.
- 5.2 (Landscape Context) – we welcome reference to the Greensand Ridge and Greensand Country. However, this section should be accompanied by a map illustrating the location and extent of the various areas in the context of Central Bedfordshire, reinforcing the significance to Central Bedfordshire of the Greensand Country area. The map on the page below does not serve this purpose.
- 5.2.4 recognises the number of Registered Parks and Gardens in Central Bedfordshire. It should be noted that, for historical reasons, many of these are located within the Greensand Country area, which has a distinct sense of place in no small part as a result of this. It should be noted that, for historical reasons, many of these are located within the Greensand Country area. These Registered Parks and Gardens, along with other non-designated historic landscapes, strongly contribute to the area's distinct sense of place.
- We welcome reference to Greensand Country and the Greensand Ridge in 5.28 onwards, but the text is dated and does not reflect the current picture (we recognize that it is difficult to keep anything like this 'current'). Reference should be made to:
  - The fact that a 5 year programme of National Lottery Heritage Fund supported activity has completed, but a strong partnership continues to operate, led by the Greensand Trust (no longer led by BRCC and the Greensand Trust). The Partnership is working to a 'Forward Plan', guiding our work over the next 5 years and including themes relating to the landscape, habitats, built heritage and the rural economy. The emphasis in the text should be on the Forward Plan, area focus and long-established partnership working (pre-dating the Lottery funding), rather than on the Lottery-funded programme. It is this desire to work in partnership to protect and enhance the area that is important, and has continued over a long period.
  - The area is the same as that of both the Greensand Ridge NIA and NCA90 (National Character Area 90 – Wooded Greensand Ridge).
  - Significant research has been carried out, including more detailed Landscape Character Assessment, Historic Environment Characterization, a Parkland Audit and assessment and a Sandstone Structures Audit. All of these reports are available at [www.greensandcountry.com](http://www.greensandcountry.com) and provide a significant resource to help inform sensitive development.
- The boundary illustrated as the "Authority Boundary" in Figure 4 (LCAs) is incorrect – it shows the Bedfordshire boundary, not the Central Bedfordshire boundary.
- 5.4.2 references the Central Bedfordshire Green and Blue Infrastructure Strategy. It is difficult to comment on the interface between this and the Design Guide because the G&B Infrastructure Strategy has not been published.
- 5.4.2 (and 4.1.1 in the introduction) should also reference the Natural England Green Infrastructure Framework (2023) and ensure that the principles within it are adopted within the relevant sections of this document.
- 5.21.1 – consideration should be brought to include the non-listed features that contribute to the historic setting of the building (e.g. sandstone boundary walls).
- 5.30.1 – 5.30.4 – this section needs to mirror 5.34.7, linking the presence and significance of historic designed landscapes back to overall landscape character (significantly contributing to the sense of place in Central Bedfordshire, not just Greensand Country, and as highlighted

through the Greensand Country LCA and Parkland Audit), rather than just mentioning that they are numerous.

- 5.39 – Appraising a Site and its Setting – Table 1 (Natural Environment Appraisal) asks the question of whether watercourses are to be retained and incorporated (in development). This is not an option, and the culverting or diversion of watercourses should be avoided in all instances as this results in the loss of natural form and function, negatively impacts biodiversity and can increase flood risk. The question should be about how the form, function, aesthetic and biodiversity value of any watercourse will be enhanced through development, including its wider setting.
- 5.9.5 should be altered to include sandstone walls as a key boundary feature
- Figures 9 and 10 need to include coursed and uncoursed sandstone as well as coping.
- 5.35.2 – a less desk-based approach to encourage heritage statements to include some experience of the site itself should be pursued, allowing the appreciation of views, vistas and the wider setting.

### Section 7: Movement:

- 7.23 – it is important that public art helps create a sense of place, but this should also be based on local landscape and heritage.
- 7.3.1 – Pedestrian Networks – insufficient reference is made to the importance of the pedestrian networks in relation to accessing green spaces. This is a key concept in Green Infrastructure planning, identified within the Natural England GI Framework through more local GI Planning (including it is assumed the forthcoming Central Bedfordshire Green and Blue Infrastructure Strategy) to Neighbourhood Plans. Providing people with safe, accessible and attractive links to local greenspaces is essential to health and wellbeing, as well as to sustainable communities in general.
- 7.3.1 should also specify a requirement to connect, in a legible manner, to the wider rights of way network to help people access the wider countryside.

### Section 8: Nature:

- 8.1 – We welcome the statement that “nature must take a stronghold in the design process from the outset” but this needs clearer explanation of what is meant/required.
- Additionally, this sentiment expressed in 8.1 is not followed through in this section. Better reference should be made to:
  - Priority habitats within Central Bedfordshire and their distribution
  - The importance of integrating natural habitats within development, enhancing them and improving connectivity between the.
  - The importance of providing opportunities for people to engage with nature close to where they live, contributing to health and wellbeing.
  - The forthcoming Local Nature Recovery Strategies and the principles behind Nature Recovery (e.g. Bigger, Better, More and Joined-Up – Lawton 2010)
- 8.1.3 should also reference resources available via the Greensand Country website ([www.greensandcountry.com/resources](http://www.greensandcountry.com/resources)), and the Natural Capital Planning documents available via the Bedfordshire LNP website (<https://bedfordshirenaturally.com/downloads/>)
- 8.2.5 makes reference to the Central Bedfordshire Green and Blue Infrastructure Strategy, but as this has not been published yet it is impossible to comment on this section. If the G&B Infrastructure Plan is not published at the time of this Design Guide being adopted then reference should be made to the existing suite of GI Plans covering the area as interim

guidance. Text from 8.2.6 should be used here. As a stand alone paragraph, 8.2.6 has the potential to create confusion with 8.2.5 and reference to the G&B Infrastructure Strategy.

- Where reference to the Bedfordshire LNP website is made a link needs to be included ([www.bedfordshirenaturally.com](http://www.bedfordshirenaturally.com))
- Additionally, reference should be made to the Natural England GI Framework, and to 'parish level' GI Plans, especially where these have been produced as part of a Neighbourhood Plan.
- 8.6.6 – sandstone boundary walls can also be a suitable boundary treatment where appropriate. This paragraph/section needs clarifying, as it lists hedging as preferential to fencing, but does not explain walling despite picturing it.
- Reinforcing Local Distinctiveness (8.6.10 onwards) should make reference to the work on sense of place and local distinctiveness carried out by the Greensand Country Landscape Partnership through its Landscape Character Assessment and Historic Environment Characterisation, available via [www.greensandcountry.com/resources](http://www.greensandcountry.com/resources).
- 8.6.7 (Planting) should also reinforce the principle of 'Right Tree Right Place' to ensure inappropriate species are not used, and to ensure that trees/woodland are not planted where other habitat types may be a priority. This principle also needs to be embedded in 8.9.4
- 8.8.1 – Management and Maintenance – it is essential that the need to establish sustainable natural habitat management is conveyed so that interest is not lost over time.
- 8.9.2 – reference to Central Bedfordshire being 'lightly wooded' (<10%) does not reflect the fact that the Greensand Ridge contains a significant proportion of its woodland (especially ancient woodland). This must be highlighted to ensure opportunities to better buffer and connect ancient woodland are optimized and not lost. Historically development has been allowed, through poor design, too close to ancient woodlands, harming them and permanently losing opportunities for enhancement. The Greensand Country website ([www.greensandcountry.com/resources](http://www.greensandcountry.com/resources)) includes guidance around key habitat types (woodland, grassland and heathland) in Central Bedfordshire.
- 8.9.5 – The statement that CBC's Heritage Trees are "mostly confined to ancient oak" is completely incorrect. The Greensand Country Landscape Partnership has created a 'Heritage Tree Trail' across the area, in association with the National Tree Register, which highlights and interprets a range of different heritage trees of several different species across Central Bedfordshire (and beyond). It is recommended that (a) this paragraph is updated with the National Tree Register, and (b) that imagery from the Heritage Tree Trail is included within the photographs (please contact [daniel@greensandcountry.com](mailto:daniel@greensandcountry.com)).
- Figure 221 (LCAs) displays the county boundary, not the C Beds boundary, as noted above.
- 8.11.7 (Design Principles) – While we agree with the sentiment, we feel that the wording here is clumsy. This paragraph should set out that we should seek to enhance the biodiversity value of *all* green spaces in and around developments, including more formal greenspaces.
- 8.11.12 – We welcome reference to Biodiversity Opportunity Networks. This should include reference to 'Re-building Bedfordshire's Biodiversity', the forthcoming Local Nature Recovery Strategy and Greensand Ridge NIA Policy (EE8).
- 8.11.14 should reference LP Policy EE8 (Greensand Ridge NIA) alongside Policy EE2.
- 8.11.14 – We welcome reference to the Greensand Trust in the context of stakeholder involvement and future management. Reference should also be made here to the Greensand Ridge NIA (Local Plan Policy EE8) and Greensand Country.

## Section 9: Public Spaces:

- Section 9 (general) – references to the Leisure Strategy and key chapters within it: Need to avoid these references becoming quickly outdated when Leisure Strategy is updated. If the G&B Infrastructure Strategy is referenced prior to publication, the updating of the Leisure Strategy should be as well.
- 9.1.2 / 9.1.4 must also reference the Natural England GI Framework (2023).
- 9.2.2 – we welcome the requirement for amenity green spaces to be multi-functional and flexible, but this must be extended to include ensuring they provide opportunities for nature.
- 9.8 – Countryside Recreation Sites – this section should include an image of Rushmere Country Park, jointly owned by CBC and the Greensand Trust – not only is this a flagship site for the authority, but it also represents a different type of recreational experience to the others, being significantly wooded.
- There is overlap and the potential for confusion between the typologies shown in 9.3.1 and 9.6.3
- 9.5.2 – Parish GI Plans within Neighbourhood Plans can also provide a guide to where spaces are needed.

Please do not hesitate to contact us if you require further assistance in applying these comments to the Design Guide SPD.

Yours sincerely



Jon Balaam  
**Director of Development**

