

RIDGMONT PARISH COUNCIL  
OBJECTIONS TO  
CENTRAL BEDFORDSHIRE COUNCIL LOCAL PLAN 2035  
PRE-SUBMISSION JANUARY 2018  
AND THE  
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



VIEW OF ALL SAINTS CHURCH RIDGMONT

‘The country life is to be preferred, for there we see the works of God;  
but in the cities little else but the works of men’

William Penn  
1644–1718

This submission forms the basis of Ridgmont Parish Council's objections to the soundness of Central Bedfordshire Council's Pre-Submission Local Plan. The objection is pursuant to allocation SE2.

## **THE VILLAGE OF RIDGMONT**

1. Ridgmont is a small village with a population of less than 400. It is an historic settlement and a village of great heritage. The parish is first mentioned in the Domesday book of 1086, by its original name of Segenhoe. In the twelfth century Dunstable Priory owned land at Segenhoe. An Ancient Scheduled Monument Medieval moated settlement can be found at Malting Spinney and the twelfth century Grade II\* and Scheduled Monument All Saints Church [ruin] of Segenhoe, can both be found on the Greensand Ridge.
2. Henry VIII visited Ampthill Park House frequently between 1524 - 1532 and James I visited Houghton House around 1621, and the site NLP244/Policy SE2 represents the royal hunting grounds that stretched the length of the Ridge from Ampthill down to the vale to Ridgmont, Husborne Crawley and Woburn.
3. Ridgmont has a number of Grade II listed buildings, including Segenhoe Manor, a rare Grade II\* listed Queen Anne Manor house and parkland, All Saints church, Ridgmont, built by Sir Giles Gilbert Scott 1855, which is listed as a Grade II\*.
4. The village was the birth-place of the Countess of Strathmore, mother of Elizabeth Bowes-Lyons, the late Queen Mother, and grandmother to the present Queen.
5. The heritage village of Ridgmont is in the Greenbelt, and is an integral part of the Greensand Ridge Country Landscape recognised nationally and locally and was designated a Conservation Area (December 1992) (*Appendix 1*). The designation of Ridgmont as a Conservation Area still remains in place. Policy 3 states that the Council *will: 'Safeguard important views within, into and out of the Conservation Area by resisting inappropriate development.'*
6. The allocation of NLP244/Policy SE2 (*Appendix 2*) on a green field site in an open landscape is therefore contrary to Policy 3, inappropriate and will ruin the rural character of the conservation area of Ridgmont and a development of huge warehouses and distribution centre with associated lorry park and ancillary buildings, will overwhelm it.
7. In 2005 the village finally achieved a bypass reducing the volume of traffic within the village. Despite the views from the village being traversed by a necessary major transport infrastructure the long distance landscape with its undeveloped skyline contributed to a timeless tranquility over much of the area.

8. Residents are now facing the adverse impact of further urbanisation from warehousing and an increase in logistic vehicles on the landscape of a small rural village. This will mean an increase in fumes emitted from HGVs and other vehicles. No air quality evidence is submitted in the Plan. Currently the green space of the Greensand Ridge countryside is the green lung for Ridgmont and surrounding villages, which counters the effects of air pollution from traffic.

## **INTRODUCTION TO THE SUBMISSION**

9. NLP244/Policy SE2, which CBC has selected as their preferred site to build a warehouse and distribution centre is situated principally in the Parish of Ridgmont, but it is also partly in the parishes of Brogborough, Husborne Crawley and Lidlington. All four parishes are affected by this proposal in that the site is located in the heart of the Greensand Ridge country and numerous public rights of way, notably the Greensand Ridge itself and the John Bunyan Trail have been well used by the local population for hundreds of years, and are most at risk of the detrimental visual impact of the proposal for warehousing and distribution.
10. The Parish Council comments need to read in conjunction with Kirkham Landscape Planning Ltd and Wormald Burrows Partnership Ltd, Civil Engineering Consultants.
11. Upon becoming aware that NLP244/Policy SE2 was being included in the Local Plan, as a potential standalone strategic employment allocation on 11<sup>th</sup> January 2018. Ridgmont Parish Council commenced a process of community engagement to seek out the views of the village and the parish more generally. All residents were invited to attend a public meeting on 25<sup>th</sup> January 2018, at which the known details of the proposal were discussed. The meeting was well attended and it was abundantly clear that none of the attendees were in favour of the selection of NLP244/PolicySE2. Since then similar views have been more widely expressed in the parish, on the village Facebook page and an online petition to Protect Ridgmont and Save the Greensand Ridge, which currently has over 230 signatures (*Appendix 3*). Residents have also made their own representations to Central Bedfordshire Council.
12. The full extent of the inclusion of NLP244/Policy SE2 in the Local Plan and supporting documents have been carefully examined and the following represents the unanimous views of Ridgmont Parish Council.

## **GENERAL OBSERVATION**

13. The overall area of the land to be occupied by warehousing, a distribution centre is 43 hectares, equivalent to about 85 football pitches. The site is within the Greensand Ridge
14. The current Marston Gate Industrial Park was built on the site of the old Brickworks, and designated as brownfield. The allocation of NLP244/Policy SE2 will necessitate building on open land adjacent to the Greensand Ridge public footpaths and the John Bunyan Trail footpath (*Appendix 4*) will actually cross the site; south of the railway line has always been regarded as the buffer of protecting urban sprawl into countryside and should be retained as such.
15. 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.
16. In this context, referencing NLP244/PolicySE2, we found that the firm conclusions concerning landscape, economic benefit and traffic impact cannot be justified. In the case of the Strategic Employment Site Assessment reports, their factual analysis is inconsistent and incorrect. These assessments do not justify the allocation of the land
17. By omitting a landscape assessment of NLP244/Policy SE2 it is unjustifiable to suggest a lesser degree of importance than in fact would be the case. This point is of significance, as there were other sites put forward for warehousing and distribution within the same vicinity that were rejected on the grounds of landscape.

## **COMMUNITY CONSULTATION AND ENGAGEMENT**

18. Whilst we appreciate that Central Bedfordshire, for the purposes of preparing a local plan, has seen fit to adopt community planning as its approach and describes it as 'a new approach unique to Central Bedfordshire Council' we do not think that it is positively prepared to provide a proper understanding of community engagement and consultation.
19. We do not doubt the sincerity of Central Bedfordshire, and its officers and councillors, to engage in community consultation, however the quality of the consultation left much to be desired. In this context we find that the firm conclusions made in the local plan and the related reports cannot be justified in regard to Section 3. This plan is not based on an objective assessment of the evidence.

20. Para 3.2.3 of the CBLP has assumed that by the mapping of community areas based on a number of factors would provide a sound foundation for the basis of the local plan we would suggest that this is not an accurate assessment.
21. Para 3.2.4 CBLP also asserts that by grouping areas it helped local residents to see the direct relevance to where they live, however we would contest this assumption. From evidence of feedback provided by local residents to their parish councils the vast majority found the consultation sessions to be inadequate, weighted and the level of knowledge from ward councillors and officers who were present to be limited in scope and understanding.
22. Regrettably Central Bedfordshire has caused some disquiet locally by misinformation throughout the stages of the consultation process. Critically, residents felt misled regarding the process of the consultation.
23. We also make criticism of the following:
- The timing of the meetings 3-7.30pm precluded a huge number of residents from attending
  - In rural communities where there is little or no transport services people without transport were precluded from attending
  - Holding 1 session per consultation period - in effect 2 consultations for each grouped ward was inadequate.
  - The consultations held in January were rushed, held extremely late in the month, particularly when the closing date was 22nd February.
  - Relying solely on Parish Councils to disseminate information to residents was unacceptable and providing a few leaflets and one poster was inadequate
  - Relying heavily on access to the internet precluded a huge number of people from participating in the consultation process when the elderly people do not have access to a computer. Accessing and using the online system is confusing and inaccessible.
  - There was very little opportunity to give meaningful feedback and where it was given it was ignored.
24. Furthermore at the consultation meetings CBC's gushing enthusiasm for the development of NLP244/Policy SE2 has we believe caused many to think that this is a foregone conclusion. This is not an open and transparent Council intent on bringing residents on board through a very real and effective consultation process. This lack of proper and meaningful consultation reduces the effectiveness of the plan and questions whether it was positively prepared.

## THE PRESENT AMENITY OF THE GREENSAND RIDGE

25. 'Geology, topography and unique historic development endows the Greensand Country with a distinctive character that distinguishes it from other regional landscapes. The underlying sandstone geology gives rise to significant areas of acid soils and historically marginal land supporting heath and plantation forestry together with a history of past and current sand extraction. Where the Greensand is overlain with clays left from glaciers during the ice age, arable land, parklands and ancient woodland dominate giving rise to a perception of 'private' land.
26. The intricate interplay of sandy and clay soils gives rise to subtle, rapid and complex changes in landscape character and a variety of semi-natural habitats. Priority habitats include broadleaved woodland, lowland dry acid grassland, lowland meadows, lowland heath, and floodplain grazing marshes.
27. The area contains 11 Sites of Special Scientific Interest, a National Nature Reserve, numerous local wildlife sites and 7 Local Geological Sites. Many of these are woodlands and contribute to a timeless tranquility over much of the area, despite it being traversed by major transport infrastructure.
28. The high concentration of woodland encloses views inwardly but the ridge like qualities of the area also offer contrasting memorable long distance views from its margins outwards across the brickfields of Marston Vale, and south to the Chilterns Chalk Escarpment.
29. The Greensand Country contains 25 sandstone churches, 24 conservation areas (covering many of the distinctive brick built villages and Georgian market towns), 36 scheduled monuments, 11 Registered Parks and Gardens (often designed by Repton and Brown including Woburn Abbey and Ampthill Park), and many non-registered parkland landscapes forming the highest extent of parkland in any National Character Area in England.
30. Collectively these historic sites in association with historical land use patterns gives the area a great time depth and archaeological potential. Part of the area around Ampthill is associated with John Bunyan who wrote *Pilgrim's Progress* and used Houghton House as inspiration for 'House Beautiful' and artists such as John Watson and Edward Callum. Henry VIII and Catherine of Aragon are associated with Ampthill Castle/Park.
31. The Greensand Ridge walk and cycle route, extensive network of public rights of way, country parks and nature reserves ensure that the Greensand Country is accessible and highly valued as a place to live and visit.' (*Extract from "Secrets of the Sands Landscape Character Assessment" (Nov 2015) "Statement of Significance"*)

32. The Greensand Ridge has been designated by Natural England National Character Area Assessment as National Character Area (no.90), and has been designated a Nature Improvement Area by Central Bedfordshire Council. The area falls mainly within the Central Bedfordshire unitary authority area.
33. The Greensand Ridge is recognised as having rich wildlife sites with many opportunities to expand, buffer and connect them across the landscape and safeguard wildlife for the future. The findings from the Lawton Report: Making Space for Nature, recognise that the required step-change for nature is only possible if wildlife is connected on a landscape scale. Whilst nature reserves and other core areas for biodiversity are still vital they cannot conserve wildlife into the future. There is a need to enable species to move across the landscape and find new places as the climate changes.
34. Villages, historic houses and the countryside are integral part of the Greensand Ridge and a key draw for those visiting the area from overseas.
35. According to Natural England, "There is a strong sense of history throughout the Ridge landscape". This stems from the history of land use, by which the area's 'marginal land' was for centuries used as parkland for recreation, as well as woodland, grassland and heathland. While these land uses declined from the 18th century, the Ridge still retains the highest percentage of historic parkland of any NCA in the country, as well as all of Bedfordshire's heathland, nearly all of its acid grassland and most of its ancient woodland. 2.4% of the NCA is protected as Sites of Special Scientific interest, and a further 14% is covered by local site designations.
36. Central Bedfordshire has a number of historic towns and villages, country houses located along the Greensand Ridge. The enclosed and wooded landscape of the Greensand Ridge with views across open countryside and the surrounding claylands, as well as picture postcard estate villages, provides walking, riding and cycling opportunities. The benefit that is to be found there is freely available for people of all ages.
37. In Section 12.9.5 of the Local Plan, the Council recognises that the visitor economy is a key growth sector and positive policies will help to ensure this opportunity can be taken further, although considerations such as the impact on landscape and the rural road network will continue to be taken into account. We believe that allocating employment land in the Greensand Ridge is unjustified and runs contrary to this policy.

## LANDSCAPE ASSESSMENT

38. The Greensand Ridge meets the required DEFRA criteria for locally designated Nature Improvement Areas, and Central Bedfordshire recognises it as a Nature Improvement Area.
39. We have carefully considered the National Planning Policy Framework 11(NPPF) Conserving and enhancing the Natural Environment and Central Bedfordshire's Policy EE8, which states that 'it is not the intention to restrict development in the NIA by specifying types of development that may be appropriate, but rather to look for opportunities to enhance nature conservation through development. Growth and development in the NIA should make a lasting contribution to its valuable environment, supporting and benefiting the natural environment.'
40. Given the significance of NLP244/PolicySE2 had its adverse affects Ridgmont Parish Council commissioned Kirkham Landscape Planning Ltd, to carry out a Landscape Assessment of NLP244/PolicySE2 (*Appendix 5*).
41. We would respectfully contend that the allocation of warehousing and a distribution centre within the Greensand Ridge country is contrary to the sentiment of NPPF 11 Paragraphs 109, 113,117, and 170 respectively and CBLP Policy EE8. Views from the south, north, west and east of warehousing will be unavoidably intrusive. In substance there would be no view at all.

## SUMMARY OF ISSUES

42. We have carefully studied Policy SP1 Growth Strategy in the First Draft Local Plan identified land at M1 Junction 13 for strategic employment development and the Strategic Employment Site Assessments Technical Documents Appendices D, E, and F (*Appendix 6*).
43. These appendices are inaccurate, contradictory, incorrect, are undated and have not been positively prepared particularly Appendices D, E and F. The scoring used in each of these these appendices is confusing and inconsistent.
44. Appendix F Full Strategic Employment Sites Assessment dated July 2017, contains inaccuracies:
  - F16 Community Consultation was assessed as N/A. No such consultation took place.
  - F17 States there are no physical constraints, which is inaccurate the topography of the site is an integral part of the Greensand Ridge Vale.
  - F 18 States that the site is not adjacent to any significant facilities in the countryside, this statement is inaccurate as the site is in the Greensand Ridge countryside near the historic settlement of Ridgmont, which is a conservation area.
  - F 21 Distance to bus stops with a frequent service is given as 500m from Ridgmont,

which is incorrect the distance is over 800m. In addition there has not been bus service from Ridgmont for at least 3 years. When the service existed it was infrequent.

- F 25 This states that NLP244/Policy SE2 was formerly the brickworks. This is factually and categorically incorrect. NLP244/Policy SE2 has never been part of the brickworks.
- F26 States there are no environmental issues, we would contend that the increase in HGV vehicles and motor vehicles will increase the effects of noise, light and air pollution
- F29 Ecological assets whilst the assessment acknowledges the impact on farmland species it ignores the Greensand Ridge, which is valued for its biodiversity and the habitats it provides for wildlife.
- F30 States there is no impact on open space or leisure designations, again this inaccurate as the site is crossed by the John Bunyan Trail and located adjacent to the Greensand Ridge with its public rights of way recognized nationally and locally.

45. If these had been scored correctly then NLP244/Policy SE2 would have consistently scored Red.

Technical Document Appendix D Outcome of Strategic Site Assessments (undated) is also confusing and contradictory.:

*'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.'*

It then goes on to say

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

46. On finding such inaccuracies and inconsistencies on NLP244/Policy SE2 within Appendix D and F we carefully examined both Stages 1 and 2 of the assessment process. In the Stage 1 assessment of strategic employment sites NLP244/Policy SE2 was assessed on its landscape character and its key landscape features. (Appendix F Full Strategic Employment Sites Assessment No 27) The conclusion was as follows:

*'Some limited scope for development in a parcel to the west of the right of way. Farmland to the east and north forms an 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. 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.'* The site scores R for Red – further assessment needed/A for Amber – consider further assessment (Appendix F)

47. The Stage 2 Technical Document Appendix E Summary of Strategic Site Assessments (undated)

and attributed to Peter Brett findings has ignored the landscape sensitivities identified in Stage Item No 27. The conclusions are as follows:

*'The site is considered suitable to accommodate the proposed development with no overriding constraints to development. Landscape impacts should be considered when determining the scale and mass of development. The site passes stage 2.'*

The Summary for the site is as follows:

*'The site is considered suitable to accommodate the proposed development with no overriding constraints to development. The site is located at Junction 13 of the M1, which is a strategic location for distribution uses. There is less of a market for office uses, although ancillary offices and some light industrial would also be suitable. The site passes stage 3, and is therefore recommended for employment allocation in the Local Plan.'*

The site is coloured Green for Preferred Employment Location (Appendix E)

48. Conversely, in July 2017, NLP178 [Winterwoods Farm], a site similar in size, and in a location opposite the Marston Gate Industrial Park and technically considered as a brownfield site, was assessed as Green, appropriate for development. However, in November 2017 it was changed from Green (Appendix F) to Red Discounted Employment Location (Appendix E) on landscape grounds.
49. Furthermore, having carefully examined [Functional Economic Market Assessment and Employment Land Review](#) carried out by Peter Brett Associates, May 2016 (*Appendix 7*), we note that a major recommendation of the report was as follows:

*'The withdrawn Development Strategy promoted a number of sites we consider suitable to meet footloose strategic warehousing demand. The Council should consider allocation them in the new local plan. By meeting this national demand in Central Bedfordshire the Council is contributing to the efficient operation of the national economy.'* (p iv)

50. In the section which puts forward Potential Development Sites we note that on Page 22-24 of the analysis for the Land at Hulcote and Salford, later referenced as NLP178 Winterwoods Farm the recommendation were as follows:

*'This site is strategically located near to the industrial parks and business estates of Brogborough, such as Prologis Park. The surrounding land use is agricultural, however, the strategic location near to the M1 makes this a suitable site for employment use.'*

*RECOMMENDATION: Strategic Excellent accessibility to M1 and proximity to existing warehousing sites.'*

51. Having examined the report very carefully we cannot find within the main body of the report or in the Section Potential Development Sites any such analysis of NLP244/Policy SE2.
52. There is an obvious and unexplained inconsistency with the assessments carried out on both NLP244/Policy SE2 and NLP178 during the site assessment process.
53. Furthermore, despite the recommendation by Peter Brett to include Site NLP178 in the new local plan it was omitted.
54. Additionally NLP178 was subject to a planning application, CB/16/05587/OUT, which was refused. We have examined the Officer's report with care and whilst we do not wish to enter into debate, we note that the application was refused on landscape grounds, which has the same relevance to NLP244/Policy SE2.

*'The proposed development by virtue of its scale and introduction of urban highway features, such as the realigned road and roundabout would result in significant harm to the character and appearance of the area by way of urbanisation and introduction of large scale industrial/ commercial units in a predominantly rural farmed landscape.'* (Delegated Officer's report 14.12.17)

55. Our concerns also arise from the contents of the document we have seen dated 25<sup>th</sup> August 2017 prepared by Lichfields on behalf of Prologis UK (*Appendix 8*) in the context of comparisons to other sites:

*'In comparison to other potential strategic distribution sites that were submitted for consideration, the proposed Marston Gate expansion site performs well in the strategic and detailed site assessments. The proposed expansion site not only provides an additional 43 hectares of land suitable for B2 and B8 uses, the site is also highly accessible to public transport and the visual impacts of its development can be reduced due to the site being adjacent to the established Prologis Park as well as its inherent topography and landscape containment.'*

56. The fact that Lichfields will allocate 8ha of landscaping in NLP244/Policy SE2 is neither here nor there, as no amount of mitigation will screen huge warehouses from the Ridge to the vale. The current warehousing, built twenty years ago has still not been adequately screened and the village suffers from light pollution, as Marston Gate is open 24x7.

57. Attached to the correspondence from Lichfields was a Masterplan, which raised the following concerns;
- Advanced discussions had been entered into with the developer and CBC prior to the approval of the Pre-Submission of the Local Plan, which we believe is premature
  - The masterplan fails to respect the distinctive landscape and context of the Greensand Ridge and the relevant footpaths
  - Critically and more importantly we were not surprised that Lichfields disclosed the dialogue between Prologis and other landowners in the area. Therefore it must be the case that Prologis, in time would progressively increase development in this area.
58. We would contend that NLP244/Policy SE2 is a more sensitive site, being located in the Greensand Ridge, which has been designated by Natural England National Character Area Assessment as National Character Area (no.90), and has been designated a Nature Improvement Area by Central Bedfordshire Council.
59. It is noteworthy that in the main body of the Pre Submission Plan Policy SE2 Marston Gate Expansion the policy also fails to refer either to the landscape or the footpaths, which run adjacent to and across the site. And therefore is inaccurate and incomplete.
60. For the reason stated above we find Central Bedfordshire selectively choosing to mislead as well as omit data to advocate its cause rather than presenting the facts as they stand.

## **TRAFFIC AND TRANSPORTATION**

61. Traffic is also of great concern and the inadequacy of Junction 13 to accommodate even small increases in traffic. In addition, the increase in HGVs and cars from a new warehousing and distribution centre, the arrival of Covanta Waste Plant in Stewartby, the development of Ridgmont Station and the proposals for 5,000 new homes in the Marston Vale will put constant pressure on this corridor, which will mean that the road network will eventually grind to a halt. Furthermore, after fighting for over 30 years for a bypass Ridgmont is in serious danger of becoming a rat run again. We are already experiencing a high volume of cars using the village, as a means to avoid motorway congestion.
62. Given the significance of the above Ridgmont Parish Council commissioned Wormald Burrows Partnership Ltd, to carry out a traffic analysis (*Appendix 9*).

## EMPLOYMENT - STRATEGIC WAREHOUSING SECTOR

63. We have carefully read the policies contained in s12.7 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)
64. 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.
65. Lichfields on behalf of Prologis has estimated it will provide 2,000 jobs, and CBC seems to have accepted this 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.
66. Furthermore current press has been highlighting the future use of automation in warehouses and distribution centres within the next five years. Amazon are intending to adapt their new warehouse facilities to total automation to cut labour costs.

*'Amazon has introduced Amazon Robotics systems into three of its 16 UK warehouses and plans to extend the systems into another three. Robots slide under a tower of shelves where products are stowed, lift it and move it through the fulfilment centre. They save space, allowing for 50 per cent more items to be stowed per square foot, says the company. "The aim is to increase speed of delivery while enabling greater selection at lower costs for customers," it adds.'* (Raconteur June 2017)

67. It may be very difficult to achieve the number of jobs predicted given the trend in warehousing toward automation.
68. The jobs offered by warehousing and distribution industry negates a huge section of society, workers need to be physically fit, able to work long hours and it discriminates against people with a disability and women with family commitments.
69. The majority of the jobs created by the sector are often low skilled and low paid. Employees are usually shift workers, low paid, on zero hours contracts, which has recently been evidenced by the exposure of the working practices of Amazon and Sports Direct. A Ridgmont resident, who worked at Amazon, left because of the poor pay, the ill treatment of management towards workers and the default on promises of permanent contracts.

70. The jobs follow the current pattern of employment at distribution centres and are filled by people from a 50mile 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.
71. Warehousing and distribution centres are footloose industries and by default can be sited anywhere (12.5.1) and the Council's FEMA and ELR (5.76). Developers and occupiers will consider sites over a wide radius.
72. We would contend that if there was a ready supply of surplus brownfield sites in suitable locations the strategy of attempting to attract these types of users may be a robust one.
73. In addition one of Central Bedfordshire's core objectives, which run through the Plan is to maximize the use of brownfield sites. The Plan has failed to set a realistic target for use of brownfield land (NPPF 111).
74. Our concern is sites, which have been identified for logistics and distribution, are in extremely sensitive locations. NLP244/ PolicySE2 immediately abuts the Greensand Ridge Nature Improvement Area.
75. The further expansion of Milton Keynes proposes large-scale allocations of warehousing and distribution centres, which we believe would satisfy this demand. We believe that Central Bedfordshire's assessment of employment sites is poorly prepared and unjustified.

## **ALTERNATIVE SITES**

76. We have carefully studied Appendix F Full Strategic Employment Sites Assessment and have found that there were other less sensitive landscape sites, which would deliver the same economic benefits; NLP210, NLP178 and NLP034.
77. We have failed to find any transparent or robust comparative assessment to show why any of these sites were not progressed, whilst NLP244/Policy SE2 has been carried forward, when NLP244/Policy SE2 has greater and more significant landscape and visual constraints.

## **RECENT APPEAL DECISION**

78. We note that in a recent appeal decision dated October 2017 at Former Readshill Quarry, Clophill, Central Bedfordshire APP/P0240/W/16/3152707 (*Appendix 10*), the Inspector was minded to refuse the appeal on landscape grounds, and made some critical comments on the value of the

## **CONCLUSION PRE-SUBMISSION LOCAL PLAN**

79. The Local Plan is not properly considered, not sound, nor objectively prepared. The Local Plan has been rushed with timescales reduced to beat a central government deadline. The assessment of need has not been carried out correctly, the site assessments have not been fully completed, nor carried out fully and correctly, there are several inaccuracies and conflicts are contained within the Plan documents themselves. This is further evidenced by the fact that both changes and additions to the documents are being made during the consultation window, making it impossible to properly consider and respond to the consultation.
80. Final versions of several technical assessments are undated, not available, are incomplete, still in progress or have not yet been commissioned, for example the transport assessments have not been concluded, with the available technical study documents primarily referring to outdated studies. There is no specific and suitable assessment for the transport impact on the M1/A421 corridor.
81. The distribution of development across the Central Bedfordshire area is inequitable and inappropriate; too much development is focused in the A421 – M1 corridor - a more equitable distribution would alleviate many of the issues discussed in the plan.
82. The Local Plan is unclear on how CBC is intending to implement the recommendations in section 9 of the Functional Economic Marketing Assessment (FEMA) and Local Employment Land Review (ELR) report. ELR recommendations do not appear to have been included in the Local Plan. The report shows there is currently an over supply of employment land, within Central Bedfordshire, and that the identified market need can be supplied from this over supply. Therefore NLP244/Policy SE2 is not justified, is inappropriate and should not be included in the Local Plan; this area includes important wildlife, natural and environmental assets, footpaths and forms part of the Greensand Ridge countryside.
83. There are insufficient safeguards in the Plan to deal with environmental issues (such as air quality), or to protect important assets such as nature, the environment, Greensand Ridge country, agricultural land, etc. The environmental impact has not been fully and properly assessed, and the Plan contains scant references to important environmental considerations. There is no overall environmental and wildlife impact assessment of this Local Plan, examining things such as the overall impact upon nature and wildlife across the area; no competent and strategic provision has been made for either protecting or improving strategic wildlife corridors .A competent, thorough and objective assessment of the environmental and wildlife impact of

development, in what is a predominantly rural county, must be made, which must then inform appropriate provision, protections and policies.

84. The plan itself states that not all the technical specifications have been investigated here; the Greensand Ridge contains a unique combination of sand and clays within the soil, with aquifers underlying it - it is a valuable source of water and highly valuable agricultural land. Development of this land would be contrary to Section 11 of the National Planning Policy Framework.
85. Policy EE5 is inadequate. More robust and proper safeguards need to be put in place to protect and conserve the nature of Central Bedfordshire's rural villages and their environs. (Ref: NPPF 170). By allocating NLP244/PolicySE2 little regard has been given to safeguarding the intrinsic character, scenic beauty and perceptual qualities of the landscape such as tranquility, Ridgmont is a small village of 150 dwellings - has listed buildings including Segenhoe Manor and All Saints Church both of which are listed Grade II\*, two Scheduled Ancient Monuments (C12th church at Segenhoe is Grade II\* too] and the medieval moat at Maltings Spinney it lies in a Conservation Area; to maintain the heritage and tranquility of Ridgmont.
86. Scant reference is made in the plan to air quality and CO<sub>2</sub> 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). 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)

#### **CONCLUSION NLP244/POLICYSE2**

87. For reasons that we have stated the allocation of NLP244/Policy SE2 is not based on objectivity in the Pre-Submission Local Plan, and if it were to be approved as such on the basis of the evidence as submitted by Central Bedfordshire then we would contend it is not sound.
88. The basis for Central Bedfordshire's allocation of NLP244/Policy SE2, as a strategic employment site is inconsistent and cannot be justified. Functional Economic Marketing Assessment (FEMA)

and Local Employment Land Review (ELR) reports show there is currently an over supply of employment land and alternative brownfield sites are available.

89. In addition CBC's Landscape Character Assessment 2015 has failed to consider the major landscape and visual constraints on site NLP244/Policy SE2. The Landscape Assessment is therefore inconclusive, incomplete and inaccurate and therefore the allocation is not justified.
90. 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 and any development is inappropriate in its location and scale, is not justified, sustainable or effective.

We have included photographs with this submission to illustrate the setting of the Greensand Ridge and the open countryside, as well as the incumbent issues of traffic flow and light pollution.

We wish to take this opportunity to advise that the Parish Council and the appointed Consultants would like to speak at the Inspector's Examination, and would appreciate notification of the date as soon as possible.

Yours sincerely

Maria Spearing

Chair

On behalf of Ridgmont Parish Council