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**RIDGMONT PARISH COUNCIL**

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

**MARSTON GATE EXPANSION: POLICY SE2**

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

**A. Introduction**

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

**B. Supporting documents**

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

## C. Local Plan

### *Emerging Central Bedfordshire Local Plan*

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

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

- C.2 The author of the above comments shows a good knowledge of the area and examined the constraints in some detail. This conclusion was endorsed in the Appendix D Outcome of Strategic Site Assessments which concludes for NLP244:
- Main issues: - Landscape considered some limited scope for development in parcel to west of ROW. Development would need to be secondary in scale to adjacent farmland, and not detract from Amazon roofline.*

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

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

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

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

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

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

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

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

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

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

*NCA88 Bedfordshire and Cambridgeshire Claylands*

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

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

*NCA 90: Bedfordshire Greensand Ridge*

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

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

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

*Central Bedfordshire LCA 2015*

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

*Opportunities for Green Infrastructure*

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

## **D. Site description**

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

## **E. Landscape context and character**

### *Central Bedfordshire LCA 2015*

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

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

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

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

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

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

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

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

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

#### *Greensand Country*

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

#### *Forest of Marston Vale*

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

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

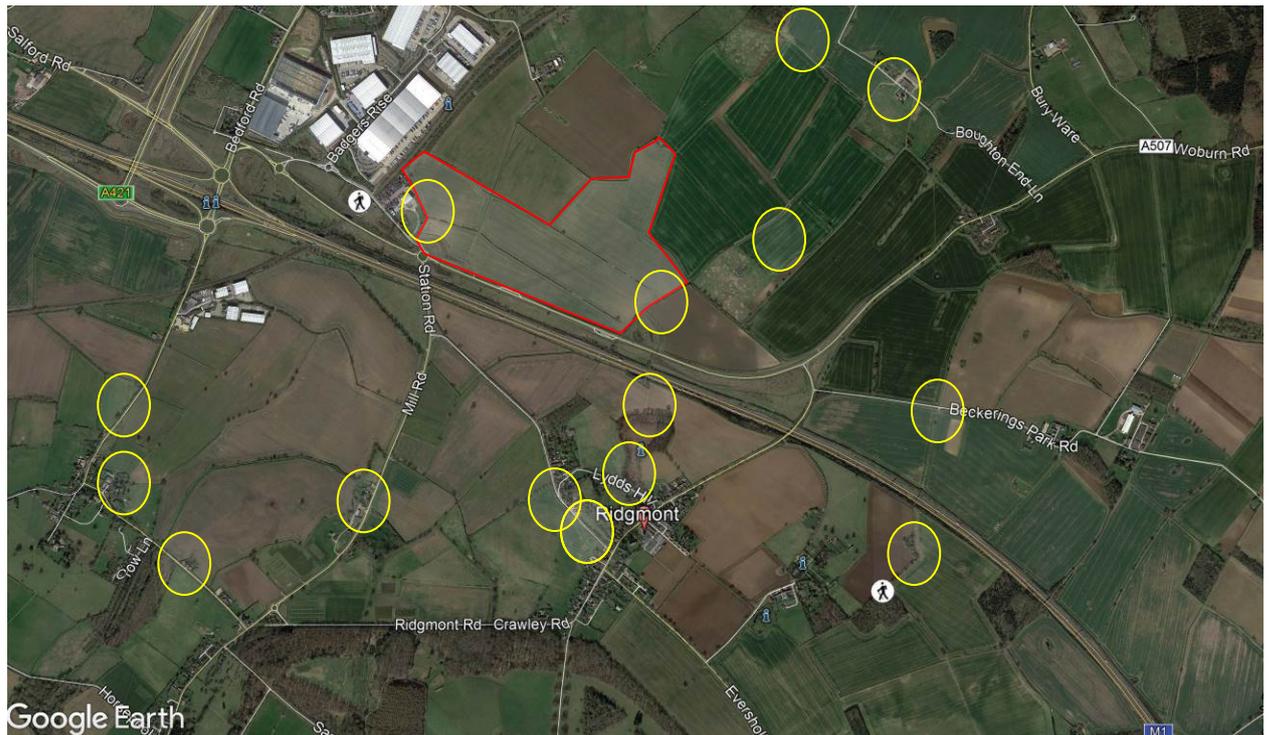
*Established as one of twelve Community Forests in 1991, the Forest extends over 61 square miles between Bedford and the M1, with the aim of regenerating a landscape degraded by former brick-working in an area also subject to growth pressures. The key target is to increase woodland cover from 3% to 30%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

#### *Former Area of Great Landscape Value (AGLV)*

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

#### **F. Views of the site**

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



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

F.3 These include:

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

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

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

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

## G. Assessment

### *Description of proposals*

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

### *Visual impacts*

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

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

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

#### *Landscape impacts*

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

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

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

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

#### *Cumulative effects*

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

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

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

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

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

## **J. Main conclusions**

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