Local Plan Central Bedfordshire Council Priory House, Monks Walk Chicksands, Shefford SG17 5TQ

Dear Sir/Madam

17 February 2018

Local Plan Objection

Marston Moreteyne Action Group (MMAG) objects to the local plan and wishes to speak at the Inspection in Public.

MMAG (formerly MMETAG) is a non-political group of volunteers who joined forces in July 2008. Our original focus was to stop plans to build a so called 'Eco-Town' in the Marston Vale area. We proved highly effective in co-ordinating opposition to those plans including getting over 700 villagers to march on the A421 (now C94). The Action Group was re-launched in 2009 to fight inappropriate development that would swamp and urbanise our individual and distinct rural communities. Over the years we successfully engaged the community in these external threats to their environment and way of life. However, on this occasion we find ourselves seeking to engage in a threat to the community driven by our very own Central Bedfordshire Council (CBC). There is therefore a justifiable sense of betrayal felt by this and nearby communities.

Planning Mania

The Marston Vale has seen no shortage in recent years of plans unrelenting in their development expectations. These included the East of England Plan and Milton Keynes South Midlands Sub Regional Strategy. Ostensibly these were all abolished to enable local authorities more freedom to plan the housing needed. The Cambridge – Milton Keynes – Oxford corridor (formerly the Oxford-Cambridge Arc) is a notional arc of agricultural and urban land at about 80 km (about 50 miles) radius of London, in south central England. It runs between the two English university cities of Oxford and Cambridge via Milton Keynes and other important settlements in Cambridgeshire, Bedfordshire, Buckinghamshire and Oxfordshire, at the northern rim of the London commuter belt. It is significant only in economic geography, with little physical geography in common. However, the 'Oxford to Cambridge Arc' is the latest manifestation of the same plan to create massive development across the same area.

In 2009 we facilitated a Conference - 'Marston Vale 2050' so the community could hear from and engage with planners about a shared vision for the Marston Vale. Central Bedfordshire Council stated at the conference that sub regional planning policy would focus on:

- Revitalisation of Bedford Town Centre;
- Reducing the need to travel by private vehicle and
- Continued environmental regeneration in the Marston Vale

There is no electoral mandate for these proposals. No one voted for housing development on this scale creating new towns by stealth.

The Scale

Residents of Central Bedfordshire are astonishedat the scale of housing numbers proposed. In the introduction to the pre submission local plan Cllr Nigel Young states "we are planning for up to 20,000 homes over the next twenty years". This understates the number of homes that will be delivered in the plan period. The actual figure is 39,350 new homes comprising 32,000 + unmet need from Luton of 7,350 giving the total 39,350. Of these homes CBC have already committed to building (i.e. provided full or outline planning permissions) for 23,528 over the plan period. So the total number of additional homes that CBC needs to deliver over the plan period is 39,350 minus 23,528 = 15,822 new homes. This is 4,178 (+26%) more homes than they are required to build – the equivalent of a new town the size of Ampthill – numbers suspiciously similar to the proposed Marston Valley four villages. CBC have no requirement to deliver these houses in this location. This is excessive, surplus house building designed to connect Milton Keynes with Bedford;the very issue this community rejecteddecisively when previously touted as an Eco-Town.

Most of the proposed homes to be built will be for people commuting out of the area; this is evidenced by the proposed 24,000 new jobs and proposed 39,350 new houses. Why are we encouraging a large amount of people to settle in, what the plan itself calls, a 'predominantly rural' area, where they will need to commute regularly outside of the area. This is both unsustainable, environmentally damaging, and will cause the permanent loss of valuable countryside and agricultural land to meet non-local needs. It will negatively impact infrastructure and services well beyond the Central Bedfordshire area as well as within. The plan should limit itself to addressing the current and properly assessed need only; it should balance the need for homes with the need to protect rural and countryside assets and should not strive for additional development that has either not been correctly assessed and/or is not clearly identified as needed.

This is clearly not justified, or appropriate or sustainable.

Transport

The region is well served by major radial routes from London (the M40, M1, A1(M) and M11 motorways, and the West Coast Main Line, the Midland Main Line and the East Coast Main Line railways). In November 2017, in its report on the Corridor, the National Infrastructure Commission called for the railway line between Bicester and Bedford to be reopened by 2023 and Bedford/Cambridge by 2030, and for the development and construction of a new grade separated dual carriageway between the M1 and Oxford by 2030, as part of the proposed Oxford-Cambridge Expressway. These are plans on paper with no certainty they will be delivered. However, the present day reality is that routes around the arc are poor, with a disjointed and overloaded road network (A428, A421/A422 and A43) and a fragmentary railway line (remnants of the former Varsity Line). A twice-hourly express bus service, route X5, is operated by Stagecoach UK Buses between Cambridge and Oxford, serving the

more important of the settlements on route; but taking 3 hours and 40 minutes to travel the 85 miles (137 km).

The Local Plan does not sufficiently address how CBC will meet the sustainability objectives identified within the Sustainability Appraisal report. Section 2.2.2 of the report states that; 'Travel patterns within Central Bedfordshire are less sustainable with a high reliance on car commuting, together with increasing pressure on interchanges and the rural road network.' The developments documented within the Local Plan are, in the majority of cases, in areas where public transport has been reduced in recent years, compelling residents to access car travel to hospitals, local amenities and other services. The plan does not account for how improvements in public transport will be funded, provided or made sustainable.

Environmental

The Local Plan policies does not contain sufficient, robust and effective safeguards to properly protect the natural environment, agricultural assets and the benefits of small rural villages and rural communities, including areas with dark skies and tranquillity. The Plan as it stands proposes the destruction of existing woodland and farmland; land once built over cannot easily be returned to food production. Central Bedfordshire is rich in both top grade soils and water resources and covering them in brick and concrete would not only contravene national planning policy, but wouldamount to reckless environmental vandalism.

Four New Villages in the Marston Vale

The proposal is misleading as it is actually four new villages and an expansion of the village of Marston Moretyene. Marston Moretyene has already contributed to housing growth with the major expansions of Marston Park and Moreteyne Farm increasing the village by easily over a third. Significant development has been continuous for almost a decade. Residents were assured by local Councillors that there would be a respite from further development.

The proximity of the four new villages is in effect creation of a new town consisting of six suburbs, four new and two existing villages. This is an enforced urbanisation of the existing community. All of the development uses precious agricultural land despite a government commitment for house building focused on brownfield sites. In addition, the CPRE states there are enough brownfields sites for 1 million homes across the UK.

There is already approved expansion of Milton Keynes to Junction 13 of the M1 / Brogborough and Bedford Borough development plans for Stewartby and Wootton. The proposed four village urbanisation will lead to coalescence of Milton Keynes and Bedford.

The former Mid Beds District Council objected to the then proposed Eco Town encompassing the same area as the now proposed four villages. In addition the then Core Strategy and Development Management Policies (driven by the East of England and South East Plans and Milton Keynes & South Midlands Sub Regional Strategy); acknowledged the Northern Marston Vale as a rural area and, in isolation, it wouldnot be a priority location for growth.

On the 7 September 2017 both Bedford Borough and CBC wrote to the Environment Agency asking that the Environment Agency refuse Covanta a permit to operate an incinerator in Rookery Pit. Their concerns focused on:

- A lack of confidence in the dispersion model used (re matter from the incinerator stack) to address the temperature inversion arising from the topography of the Marston Vale
- Health impacts of particulate matter on local residents
- Health impacts of Diesel emission from 594 HGV movements a dayon local residents

Yet the very same Council are now promoting large scale housing development in the same area and much of it very close to the incinerator.

There is concern over the impact of lack of infrastructure and the potential burden on existing facilities within Marston Moreteyne. Whilst new health facilities are identified within the plan, there are no guarantees that these will be actively delivered by the NHS. This would leave existing health facilities in Marston Moreteyne and Cranfield further overloaded and heading towards the point of collapse. Similarly there are concerns expressed over education facilities. Marston Moretyene's new lower school (Forest End) is currently being extended to accommodate additional pupils because of permissioned development in the parish. Further substantial education requirements will also be challenging with regard staffing and ongoing funding beyond creation of the buildings.

There is grave concern regarding the impact that this level of development will have on the newly downgraded C94. Any traffic accessing/leaving the proposed development will have to do so though one of the four surrounding villages: Marston Moreteyne, Brogborough, Lidlington or Millbrook. The belief is that the majority of traffic will use the C94 resulting in Marston Moreteyne and Brogborough being the worst affected. The new development of housing at Moreteyne Farm borders the C94. The road at this point has been narrowed and has a 30mph speed restriction. The scale of the proposed development would therefore have a significant, detrimental effect on the existing community of Marston Moretyene.

CBC should be exploring a more radical solution to lorry traffic to and from Millbrook Proving Ground. The proposed Cross Vale Link road simply shifts lorry traffic affecting one part of Marston Moreteyne to another part of the same village.

Conclusion

In summary, the local plan provides too many houses, in the wrong places, depending on massive infrastructure investment which is far from guaranteed, involves destruction of the countryside and wildlife habitats. Once that is gone it is lost forever.

Stewart Long,

Secretary, MMAG

www.mmetag.com