

Comments from the Marston Valley Stakeholder Group (MVSG) on CBC Planning Application CB/18/01969/OUT:

Development for up to 5,000 new homes specialist accommodation, up to 30ha of employment land, retail, community, open spaces, leisure, and sports uses, hotel uses, 5 primary schools one secondary school, woodland planting, waterbodies and waterway links, ecological areas, accesses, cycle, and pedestrian routes, supporting infrastructure, ground remodelling, landscaping and demolition works.

Site: Land between Brogborough, Lidlington and Marston Moreteyne.

Dear Stuart,

The Marston Valley Stakeholder Group comprises Marston Moreteyne, Lidlington, Brogborough, Cranfield, Hulcote and Salford and Ridgmont Parish Councils, Millbrook Parish Meeting, Marston Moretaine Action Group and Lidlington Action Group.

The Marston Valley Stakeholder Group (MVSG) was set up at a very early stage to give residents direct input into the development process via Parish Council representatives and local action groups. It is the main interface between Central Bedfordshire Council and local representatives relating to the Marston Vale Strategic Allocation within the Local Plan. The Stakeholder Group is a forum for providing updates on the planning application and any other issues related to the Marston Vale proposed allocation, to the local community representatives.

Participation in the Stakeholder is without prejudice to that organisation's position with regards to the principle of developing the land.

The group meets regularly with Officers and the applicant to receive information and to feedback.

Each organisation involved in the Stakeholder Group may wish to make further comments in addition to this joint letter of Objection.

The Stakeholder Group OBJECTS to the planning application 18/01969/OUT on the grounds of highways, built environment, build out plan, heritage, governance and ecology.

HIGHWAYS

Traffic Assessment

The MVSG is deeply concerned that the choice of wider study area, use of traffic counts dating from 2016, assumptions made around trip generation in the proposed development and decisions to exclude some cumulative data result in an underestimation of impact on

the local highways network, and on J13, which in turn will lead to an unacceptable impact on the host communities; and that the mitigation proposed is not adequate and that a monitor and manage approach is unsatisfactory.

Baseline Transport Conditions(Updated TA 5.1 chap 4 p19)

The applicant is relying on the traffic counts carried out in 2016 to provide baseline data. Whilst the applicant attempts to justify this, It is considered by the MVSG that this is too long ago in an area which has seen rapid and significant development and must be updated with more recent date base line information.4.1.4 states the 2016 baseline data has been checked against the latest available set of data but doesn't say what this is or where it can be found.

Saturn Network Wider Study Area (Updated TA 5.1)

The area of the Saturn Network Wider Study requires review as it remains very narrow, especially given the close interrelationship between the Marston Vale and Milton Keynes. The Marston Valley application site falls within the Milton Keynes housing market area. Milton Keynes is the largest nearest economic centre and is key to trip generation for employment, shopping, leisure activities etc. It cannot be right that the wider study area does not include any part of Milton Keynes but does include rural areas around Westoning and Pulloxhill. The study area stops short of J14 but there is a clear interrelationship between the Marston Vale and existing routes to and from J14 including to Cranfield university.

There appears to be no reference to suggest CBC have agreed to the Wider Study area.

Saturn Model and Trip Generation calculations.

The MVSG does not consider the assumptions used in the trip generation model fully take into account the impact of the development. This is of critical importance to the host communities who are deeply concerned about the likely traffic impacts from the development on their own communities and how these will be successfully mitigated.

The MVSG disagree with the following assumptions which it considers to be wholly unrealistic:

Para 7.6.5 (p34) states that *the proposed development delivers a new sustainable community in transport terms with a mix of land uses that aims to provide an environment where most day to day travel needs can be met within the site. With the associated reduced impact on the external networks. This is captured in the MVTM modelling process.*

The MVSG considers the assumptions made here are critical – It is entirely unrealistic to assume that this development of 5,000 houses, a settlement of 13,300 people providing 4,200 jobs will consume its own smoke. The aspiration for a 'modal shift' in behaviour where people walk or cycle to work or take public transport strikes us as being unlikely. This is not an urban extension where this might be a more realistic expectation. Furthermore, the scale of public transport proposed is unlikely to generate a behavioural shift. These

assumptions need to be robustly challenged otherwise the whole modelling on impact on external road network will be underestimated. Para 7.6.9 notes that TRICS modelling suggests an underestimation of vehicular residential trip generation but this is discounted based on the inherent sustainability of the development. Again, this is evidence that needs further examination. Earlier challenges from the local authority with regard to trip generation and comparison with TRICS seem to have been dismissed.

In order to illustrate this point we have compared traffic counts from 2016 with predicted trip generation in one location for the Passenger Carrying Units (all traffic but converted to car equivalent units) as an exemplar comparison for each of the test case years; 2029, 2035 and 2042. For this exercise we have taken the applicant's 'Junction 14', (Bedford Road, North of Salford Road, Brogborough) data, comparing AM Peak for Passenger Carrying Units (PCUs).

In 2016 the observed 2 way total at junction 14 in the AM peak is 483 PCUs outbound +178 inbound =661 PCUs (Peter Brett SATURN local model validation report table 7.5 and 7.6 pages 31 -32 AM peak flow validation PCU/hr)

For the 2029 predicted AM peak for PCUs predicted to occur without the development (reference case UTA 8.4B) is 10882 way PCUs in this location. An increase of 427 on the 2016 observed trip numbers. The number of 2 way PCUs predicted to occur with the development (test case UTA 8.10B) is 1188. This is with an anticipated development of 1625 houses. The model is predicting therefore, an increase of 100(2 way) PCUs generated by a development of 1625 houses in the morning peak on the approach to Junction 13 of the M1.

The 2035 test case anticipates the development of a further 1650 houses. The AM peak without the development at junction 14 is predicted to be 1134 PCUs (UTA 9.4B) and with the development, 1351 PCUs (UTA 9.10B). An increase therefore of 217 PCUs generated by the development of 3,275 houses plus employment and schools.

In the 2042 test case the development is assumed to be complete. The AM peak without the development at junction 14 is predicted to be 1192 PCUs (UTA 10.3B) and with the development 1532 PCUs (UTA 10.9 B). An increase of 340 PCUs on a settlement of an anticipated 13,300 residents plus 4,200 jobs and around 1600 school places.

For the scale of development, in each test case the predicted increase in passenger car units, ie all vehicle types feels unfeasibly low. It is critical that these assumptions and predictions are accurate as they go to the heart of the mitigation that will be required to manage traffic flow through and impact on the host communities. There is no confidence within the Stakeholder Group that the assumptions made and traffic volumes predicted are realistic. This must be addressed before any mitigation can be considered or agreed.

All of the test case traffic flows should be compared to the base line data. In addition the failure to assess the junction of Sandhill Close and Station Lane in Millbrook is a serious omission as there is no accurate measure of the flow of traffic through Millbrook village.

Cumulative Sites Development - (technical note 4A cumulative sites)

The cumulative sites development assessment does not include a number of sites in the area that are committed for development in Local Plans. For example, SE MK is not included. The rationale for not including it seems flawed as this is a strategic site allocated in the MK Local Plan. The site is being actively progressed with a development brief endorsed by MK Council recently and there must be a reasonable degree of certainty that it will proceed in the next 3 years. Given its proximity to J13, and likely impact on J13 this site must be included.

Similarly, the Marston Gate expansion site at J13 is not included. This is a committed strategic site in Central Beds' Local Plan, with a live planning application currently out for consultation. Again it is reasonable to assume this site will proceed within the next 3 years.

The MK East urban expansion site at J14 of the M1 does have planning permission and should also be included. Traffic from this development is already identified to have an adverse effect on Cranfield High Street and the 2 schemes, Marston Valley and MK East should be considered cumulatively for Cranfield.

The strategic allocation of 1000 houses at Stewartby brickworks should be included in full, not just the first 100 homes. Housing growth numbers for Beds Borough should also be double checked. For example, are figures included for the significant housing growth at Wootton?

External education trips

The MVSG agrees with CBC that realistic numbers of external education trip generation should be allowed for. Whilst the intention may be to closely align school places with demand this is extremely difficult to achieve and inevitably pupils will come into the development to fill the places, especially given the attractiveness of new school builds. There will also be an element of choice with pupils flowing out of the development to schools elsewhere.

East West Rail proposals technical note (4A p3.)

Whilst the TWAO changes are included, the development needs to allow for sufficient flexibility to accommodate EWR if or when any revised proposals come forward. In fact there seems to be a reluctance on O&H's part to engage with the EWRco despite the significant impact and potential public transport benefit an upgrade of the Marston Vale line could bring to the development. In particular a road bypass route from Sheeptick End/Station Road Lidlington to Marston Road near Chuffa Cottage should be safeguarded as the current EWR proposal for a road bypass to the west of the village is undeliverable. The potential rail bypass route to the north of the village should also be safeguarded. Any greenspace land take would need to be compensated within the development. Sufficient flex should also allow for the potential relocation of stations with active consideration for first mile last mile access. There should be an ongoing dialogue between O&H and the EWRco. This does not seem to be happening at present.

Monitor and Manage proposals (UTA 5.1)

The Transport Assessment (UTA 5.1; 1.3 page 2-3) proposes a flexible 'monitor and manage' approach to transport mitigation, to ensure infrastructure provision is delivered at the right time in the life of the development. This includes providing a sum of money to be used to provide mitigation as required. Our concern with this approach is that we will be in endless ongoing 'discussions' with the LA and applicant over when and what additional mitigation is required - an endless source of dispute and aggravation. Mitigation needs to be clearly identified and agreed at the outset. The MVSG appreciates a monitor and manage sum of money does have a place, but, mitigation should be separate and specified away from the 'monitor and manage' pot.

Mitigation Junction 13 and local road network (UTA 5.1)

Whilst we appreciated the presentations we have received from Stantec and O&H on transport we are particularly disappointed that the feedback and suggestions made to the Local Authority and to the applicant following the 2 briefings on transport in February 2022 have not been taken forward nor addressed as part of this planning application. We have therefore appended our comments to this letter and formally request that our views are taken forward now as part of the planning application. Whilst Parish Councils will provide comments on the individual schemes proposed in their parishes we have the following principle concerns:

J13 on the M1 must function reliably. If it doesn't it will encourage alternative routes to be used such as rat running through Lidlington and Millbrook to the A507 and through Hulcote and Salford to J14. Residents in Brogborough already report avoiding J13 at peak times by travelling north out of their village along the C94, taking Sheeptick End through Lidlington to the A507 rather than turn south to queue on Bedford Road to join the A507 at J13. The mitigation as proposed for J13 in this planning application seems light touch. There is a cumulative impact on J13 from development across the 3 local authority areas – MK, BB and CBC. A holistic solution must be found rather than piecemeal contributions which will not address the fundamental capacity constraints at J13. The Stakeholder Group strongly requests a joint study between the 3 local authorities and Highways England to seek a sustainable long term solution to congestion at J13. We consider this to be key to the transport success of the development and to relieve the impact on the rural roads in the host communities

A proper solution must be found for Lidlington and Millbrook—we have grave concerns regarding the impact of traffic generated by the development on routes through Lidlington and Millbrook, on country roads never designed for more than local village traffic. It is not acceptable to say that these roads are not at capacity and therefore can take additional load. The attractiveness of Lidlington is precisely because Station Road, Church Street and Bury Ware are so quiet. Access to the A507 at Bury Ware is acknowledged to be dangerous and Bury Ware is steep and narrow. The proposal to run a public bus service through Lidlington on the existing road network seems unworkable.

What happens to traffic generated by the development when it reaches the end of the proposed 'primary route' and meets Station Road in Marston? Where is the traffic going to go? We consider the traffic is most likely to turn right out of the development to access the A507 via Millbrook village as the most direct route. There is no mitigation proposed for Sandhill Close in Millbrook yet Millbrook village is already under unreasonable pressure from rat running to the A507 and access to Millbrook Proving Ground. There isn't even a continuous footpath through the length of the village. It's very narrow and it is necessary to cross the road 5 times to walk through the village. This needs to be addressed. It seems odd that the roundabout with the A507 and Sandhill Close will need mitigation, but not Sandhill Close itself.

The primary route feels like a positive solution as a bypass for the centre of Marston and as a route to Millbrook Proving Ground for HGVs, but it does not address the issue of traffic accessing the A507 and the existing routes which will be used by traffic from the development through Lidlington and Millbrook are both unsuitable and additional traffic will impact adversely on the host communities. This approach must be reconsidered and a sustainable solution found that takes traffic generated by the development away from Millbrook and Lidlington. The only workable solution to achieve this would be a new route from the development to the A507.

Timing of mitigation also needs further consideration. For example the spine road is not considered to be required before 2035. We consider it is essential that this is delivered early in the development so that the new communities can form good habits early.

Delivery of infrastructure

Of critical concern is the timing and phasing of infrastructure. The Stakeholder Group particularly asks to be involved in discussion on this. In addition to the phasing of the road infrastructure mentioned above, some of the proposals such as the new doctor's surgery needs to be built and operational early so that further pressure is not imposed on the current facilities which are already at capacity.

Heritage

The red line area excludes the ringworks/roundhouse site located in the proposed Brogborough Country Park and which is in private ownership. The MVSG consider it is critical to the success and integrity of the country park that the ringwork/roundhouse site is brought within the red line area where it could form a really super focal point in the country park, with its fascinating history and 360 degree views afforded as a defensive site. English Heritage have recently reviewed the roundhouse and ringwork listings. Whilst the Ringworks, a scheduled ancient monument has retained its listing, EH have removed the Roundhouse listing as there is very little left and it is no longer considered listable in its own right. With the complication of trying to preserve/make safe/restore the Roundhouse removed, this creates an opportunity to find a way to bring the site into the country park as the brickwork and former agricultural sheds on site can be cleared to make safe. It also provides an opportunity to clear scrub and restore the ringwork monument for all to enjoy. The MVSG strongly request that this becomes a requirement of the scheme. Otherwise we

fear this site will end up being boarded up to keep people out and become a magnet for antisocial behaviour.

Build out Heights and Build Density (Parameters Plan Q and DAS p29)

Our general view is that the 'up to' building heights are too high in each location as shown on the parameter plan Q, and are not reflective of a 'village' environment nor read across to the existing settlements in the Vale, where building heights are generally low. Where they are higher, for example at the Proving Ground they are very well hidden in the landscape. This needs to be addressed in each location, especially as there is no indication on how much building in each location might be above, say, 2 or 3 storeys in height. In particular we object to up to 20m built height on the employment land at Sheeptick End. This is at the 'gateway' to the vale, in a sensitive location and will be very prominent in view from the A421 and C94. It will also be harmful to the setting of the Ringworks (this location is clearly visible from the former terrace at the roundhouse within the ringwork complex). We also objects to built height of up to 15m directly adjacent to the area south west of Lidlington described as 'restricted building heights up to 9m'. Up to 9m is also too high in this, the most sensitive location in terms of landscape and visual impact. The area of restricted building height should extend along the whole of the edge of Brogborough Country Park. Overall, building heights needs much greater consideration in all locations.

Build density seems particularly high at 60 dwellings per hectare at Brogborough Lakeside We are concerned that high density in this location will adversely impact the tranquillity and wildlife on Brogborough lake.

Green Infrastructure(Parameters Plan Q)

Woodland planting in the Brogborough Country Park area requires careful consideration so that long reaching views out of the park and from the Ringwork scheduled ancient monument can be maintained or improved. There are amazing views along the length of the Marston Vale and over to both the Greensand Ridge and the Cranfield Ridge already from footpaths on the slopes of the Greensand Ridge in what will become the park area and from the Ringwork complex itself. In particular careful consideration should be given to the wide sweep of trees proposed to the northwest, west and southwest of the Ringwork site as trees in this location might harm the openness of the Ringwork setting.

The new proposal for bus route B through the country park is not supported.

We are also concerned that 'other green infrastructure' such as playing fields located west of Primary School P5 will be urban or suburban in character and not fulfil the requirement of a 'green buffer' to protect Lidlington.

There should be advance planting at least several years in advance of development to secure the green buffering between the new & existing housing as promised at the January 2022 meeting of the Stakeholder Group by the Applicant. This needs to be secured as part of the outline application.

Governance (5h Governance Strategy)

The MVSG objects to the governance strategy as outlined in 5h Governance Strategy. This strategy cannot proceed on granting of an outline planning permission for the following reasons.

The strategy does not acknowledge or involve at any stage this stakeholder group which was set up as the main interface between the Council and O&H as the development progresses. This must be the starting point for any new governance arrangements.

There has been no consultation or discussion with the stakeholder group about possible governance arrangements. This is a significant omission that could have been addressed at any stage since the group was established in 2019.

The strategy does not acknowledge that the development is taking place within 3 existing parish council areas. The Parish Councils have not even been invited to express a view on how they wish to proceed with governance arrangements within their own parish boundaries.

The proposed 'Marston Valley Voices' group, (which incidentally, sounds like a choir) could have a legitimate role in, for example, the development of community activities however it is not the right forum for discussions about governance arrangements which must involve the host communities. Furthermore, the proposed make up of the group seems somewhat random, ignoring the parish councils and ward councillors who are the elected representatives for the area and has a strange emphasis on representation from Wootton Upper School which isn't even in Central Bedfordshire and won't be the secondary school for the development. It feels like O&H are trying to create a company centric community group. This may have worked in the Hamptons, where there were no host communities but is not appropriate here.

The governance proposals feel very much at the exclusion of the host communities. This is wrong and must be reworked in full consultation with the host parish councils, ward members in consultation with the Local Authority and cannot proceed as outlined.

Ecology

The following points have been made by an ecologist who has kindly reviewed the ecology evidence on our behalf:

The field cow-wheat, which is in the south of the site and which appears from the plans to be under a road. At the very least it's at risk. This is the only site in the county for this species. It's not a 'BAP Priority' species nationally but it is a local BAP priority. It's considered an 'Important Arable Plant' by Plantlife and is endangered in England. So it's pretty

special. What are the plans for its retention or translocation, assuming translocation is even possible (which it often isn't)?

The otter activity appears to have become more spatially restricted since the previous surveys in 2015/16. Why is this? The previous surveys found an otter holt, which again appears to be under a road in the masterplan. Before neighbourhoods are designed in otter territory the MVSG would like to know how and why the pattern of activity seems to be changing so it can be accommodated in the site design. Annual surveys might help but depending on the results some specialist advice might also be useful.

The badger reports have been redacted but they also will need to be considered in the overall design. Where are the setts, where are the clan boundaries and how will those be addressed in the design? A contingency plan should also be made (so far as it's possible when dealing with badgers) in case they go reoccupying old setts which they're prone to doing. In some cases badgers have effectively become trapped by development where all the minor setts have been closed and houses built all around.

Site-wide there will need to be some detailed consideration of road design. In addition to the otters and badgers (and other small mammals) which need to get from A to B the best GCN area is to be an employment site. You can provide all the habitat you want but if you don't provide things like mammal underpasses, proper gullies, dropped kerbs, otter ledges etc the result will simply be isolated individuals and populations. And roadkill of course. There's a project here in itself: simply looking at the patterns of where species are and where they forage and commute to, and making sure the grey infrastructure is designed to allow them to do that safely. Animals tend to use the same paths to get places so these need to be accommodated.

The biodiversity net gain seems to be achievable, largely because so much retained habitat is within the red line boundary so there are on-site opportunities for enhancement.

We make the following additional comments:

The ecological surveys found only one Common Buzzard flying over the survey site through the entire survey period. There are at least two breeding pairs of Common Buzzard to the south of Brogborough Lake and Buzzards are a regular sight all over the development area at any time of the year. The Red Kite is also now a very common bird and likely to be breeding around Brogborough Lake and at other sites within the development area. Areas of Open Mosaic Habitat around Brogborough and south of Brogborough Lake seem to have been completely missed off the habitats survey. These habitats contain important populations of nationally declining Dingy and Grizzled Skipper Butterflies. This needs to be addressed.

Disturbance of wintering wildfowl on Brogborough lake during and after the development period is unacceptable due to the irreversible effect any disturbance will have on wintering wildfowl numbers. Many birds like Pochard and Tufted Duck are already suffering long term declines in the UK and undisturbed wintering sites are vitally important for these and other wildfowl. Development pressures and increased water sports activities will disturb these wintering birds. Pochard have been found to be the most sensitive to human disturbance.

Many breeding birds around Brogborough lake will be displaced through the development encroaching on lakeside habitats and increased disturbance around the lake edge.

Increasing use of the water for activities/sports and pleasure will no doubt further degrade the number of breeding birds around the lake, added predation pressures from domestic cats will have further impacts on breeding success. These above mentioned impacts have the potential to degrade Brogborough lake as a County Wildlife Site.

The loss of several large grassland and Meadow habitats from within the development area will further add to the shocking decline in the UK wildflower meadows and natural grassland habitats, this will also directly impact on birds such as the Barn Owl, These grassland habitats are vital as the Barn Owl's main food source is the Field Vole. Barn Owls are present within the development area and no mitigation to replace this habitat has been put forward by the developer. Road design needs to be a consideration as owls fly low and will be at risk of collision. It is observed that there are several pairs of Barn Owls and Tawny Owls around the Millbrook station area.

At least 5 pairs of Nightingales has been observed in the Millennium Park.

Declining species such as the Skylark will become extinct as a breeding bird from within the development area and again no plan has been put forward to mitigate this loss by the developer.

Due to habitat loss Yellowhammer will likely also become extinct as a breeding bird within the development area along with Lapwing and Grey Partridge.

Polecats and Mink are also observed within the development site.

As part of the biodiversity net gain can the developer make room within the scheme for a large wildflower meadow, or make Brogborough Lake a nature reserve along with Lidlington Lake?

Aspiration for the development

The governance statement (5h) says:

'The inspiration for Marston Valley comes from the lessons learnt from the Garden City movement: creating places that people are proud to live in and would be of such architectural merit that they could become future conservation areas. These sound design principles are blended with the demands of contemporary living – our aspirations to be part of a thriving and connected community, to better balance home, work and leisure time, to travel more efficiently and to access high-quality services. The vision for Marston Valley also plans for our growing societal challenges – the rising cost of energy, how we look after the older generations, more flexible types of housing tenure and the way in which our communities are diversifying. Marston Valley will be a unique place. Its ethos is borne out of an appreciation for the existing natural features within the Marston Vale. The aim is to create an exceptional living environment where people will be inspired to live, work and visit.'

It feels like these ideals are not borne out in the reality of the planning application. We note the substantive changes to the design and access statement and the parameters plan since the original submission are limited and principally relate to the education model. There is no analysis of how the development meets the principles in the Development Brief which was

endorsed last year long after the outline application was originally submitted. The outline application needs to be tested against the Development Brief, which the Stakeholder Group contributed to significantly over a 2 year period.

The Forest of Marston Vale Supplementary Planning Guidance should also be a material consideration in the assessment of this application.

Conclusion

As the outline application stands there are many critical issues that remain to be addressed. We object as outlined above.

Yours sincerely

Sue Clark

On behalf of the Marston Valley Stakeholder Group: Marston Moreteyne, Lidlington, Brogborough, Cranfield, Hulcote and Salford and Ridgmont Parish Councils, Millbrook Parish Meeting, Marston Moreteyne Action Group and Lidlington Action Group.

Sue Clark, Ward Councillor for Cranfield and Marston. Cranfield Court, Wood End Cranfield MK43 0EB