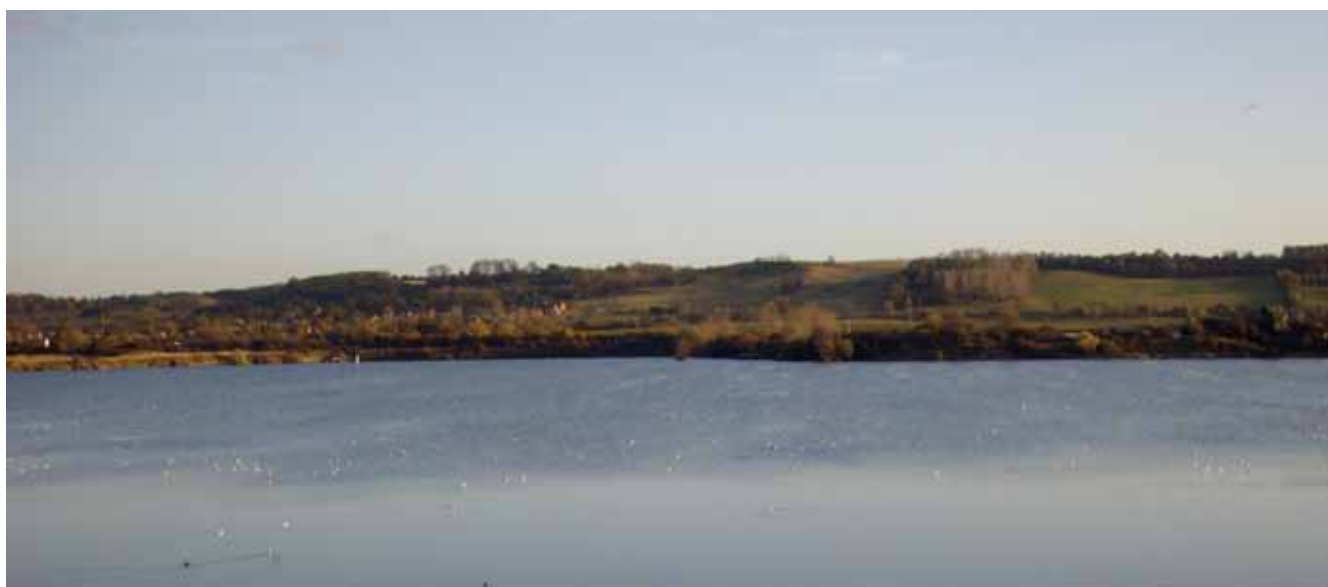


Living a Greener Future In the Marston Vale

Analysis of the proposal
by O&H Properties
for an 'ECO?' Town
Designed by
David Lock Associates

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Drafted by Iain Clapham on behalf of

Lidlington

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Overview

The Town and Country Planning Association

‘Best practices in Urban Extensions and New Settlements guide’ says
“Our mental maps of England retain the very clear idea that town and country can and must be clearly delineated, one from another. Urban sprawl, a half-hearted form of town, smeared carelessly across the countryside, is reviled by all. Our planning system was devised to stop it happening, and that remains one of planning's main objectives.”

We agree wholeheartedly with their statement.

The concept of outstanding design coupled with excellent innovation and careful delivery of a 'Zero Carbon self sustaining community' is how many people perceive the phrase “Eco-town”





Regrettably the “Living a Greener Future” programme has been diluted. Standards have been lowered to eliminate the obstacles in the way of unsuitable sites.

The Eco-town programme has become a competition among land hoarders to produce 'worthy words' to gain the valuable award of planning consideration.

The Marston Vale proposal is just another car-based 'eco aware' suburban town smeared carelessly across the countryside.

We urge this Government to cease manipulating the planning system. This is an attempt to rush through extra homes in a poorly considered way. It is bad for the environment and a threat to the carefully considered growth in the area itself.

Key Points

-  Largest bulk of proposed Development is not in the identified Growth areas for any of the Regional Plans
-  “Vision” is neither Urban extension or Distinct settlement just a sprawl of estates linked up by a NEW 'ECO? Road' through the vale
-  Subsumes local villages and joins Milton Keynes up with Bedford
-  Without massive job stimulus, it can only aggravate Bedfordshire's commuter problem

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Affordable Housing

The Affordable Rural Housing Commission defines this as :-
Whether or not market housing is on offer to buy at a level which people can afford, usually defined as 3.5 to 4 times earnings.

The cheapest form of housing is self build – yet the Eco? Town programme makes no mention or provision for it. The ECO? Town scheme cannot possibly deliver Affordable Rural Housing as the series of sites designated in the Marston Vale will be yet more Urban Sprawl.

Delivery of any Social Housing is dependent on speculative building of private homes, given the economic uncertainty and the large number of projects on hold this represents a VERY HIGH RISK.





O&H already have much social housing with planning approval for which there currently seems little prospect of delivery .

Should the project proceed there will be uncertainty on ratios of rented/shared ownership and variation in demand because of unknown migration patterns. This may well result in large tranches of unused new Social homes and increased long distance commuting.

Travel poverty – People occupying social homes tend to earn below the average wage or have high demands on their income (larger families etc.) This increases the proportion of their outgoings relating to travel costs. The remoteness of this ECO town is most likely to add to social exclusion as low-cost transport (walking & cycling) is not an option. With the price of public transport increasing in direct proportion to the number of people travelling , car travel is not a luxury choice – it is an economic necessity.

Bedfordshire pay rates for local jobs are acknowledged in the Sustainability Assessment as in line with average earnings. These exemplar homes will certainly be more expensive than average locally available homes

Key Points

-  No RURAL housing social housing will be created in an 'Urban sprawl'
-  No lower cost 'self build' plots or entrepreneurial 'green cooperatives'
-  Extremely HIGH RISK project – rewarding O&H's failure to deliver
-  Remoteness and poor transport will accentuate TRAVEL POVERTY

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Biodiversity & Green Infrastructure

The Forest of Marston Vale say :-

“Our challenge is to use trees and woodlands to transform 61 square miles between Bedford and Milton Keynes, repairing a landscape scarred by decades of clay extraction, brickmaking and landfill.”

Commuter housing estates do not appear in the list of recovery measures to be deployed by the Forest of Marston Vale.

The area has been recovering for over 50 years. There is now a far greater biodiversity on offer thanks to the natural vale basin plus the flooded extraction pits.

Any development near to these pits would involve 'concrete edging'. This is most likely to increase nuisance species such as gnats, Disturbance of the natural water edge is very likely to reduce the presence of wildlife.

Currently the area offers about 90% 'Green Space' the proposal to offer 40% Green Space will have a negative effect on the variety and volume of species in the area. The 40% promise is indicative of the barrage of 'weasel words' which have accompanied the governments “Living a Greener Future” programme.

Given that the Greensands Ridge runs adjacent to the site and is an Area of Great Landscape Value it is obvious that this important adjacent habitat will suffer air, light and noise pollution from the urban sprawl proposed. The need for this 'Green Lung' was acknowledged by government with a £3 million grant to the Greensands Trust who help to manage the area.

Whilst the site is in the East of England area, it is impacted by the the South of England Plan outcomes. However there is no responsibility to consider the cumulative effect of excessive development on rare species and their habitats.

Key Points



ECO? Town will create air, light and noise pollution



Recovery of this area as a 'Green Lung' is still in progress



A good range of diversity in habits is already on offer



NOT a 'Despoiled' landscape – it is a National Forest in the making

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Community and Governance

The vision for the eco-town will be 'owned' by the Marston Vale Development Company (MVDC), a free-standing property development company established by O & H Properties

Despite much protest from the local community, O&H Properties continue to permit the operation of a large car-boot sale. This activity was identified in the draft Lidlington Parish Plan as the cause of great traffic commotion and danger to villagers on foot. Furthermore it is the home of serious criminal activity.





O&H Properties recently warned homeowners regarding the use of land which has been their gardens for many many years. It is widely believed that the land in question was actually promised to the community as a result of aggregate extraction granted in 1994.

O&H have a poor record of community engagement; their roadshow provided more questions than answers. David Reavell (O&H's Property Director) said "Plans for the Eco-Town are evolving throughout the summer and we are going to make sure that residents are kept up-to date with the latest news." He clearly failed as their Bid-Update (August 2008) was not available at the October Roadshows. His promise of delivering details of their planned ECO? Town to "every home and business in the Marston Vale" did not happen.

O&H Properties' ownership of land in the Vale is strictly commercial. It was sold to them by the Hanson Group, to avoid London Bricks' commitments to restore the area – a transaction known locally as the SOAP !

The prospect of this company acting with powers similar to a duly elected council sends shudders down the spine of every right thinking local resident.

Key Points

-  "Vision" lacks commitment to Community – NEW or OLD
-  Sprawl of sites will lack vital heart and fail to foster sense of Local Community or Civic pride.
-  There is little trust of O&H within existing communities
-  No evidence that developer will provide 'quality green lifestyle'

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Consultation

DCLG say “It is important for local communities to have their say on individual schemes and community engagement is a vital part of the process for delivering eco-towns successfully.”

The lack of consultation and information for local residents has not enabled this engagement to take place. During Phase 1 of the “Living a Greener Future” consultation, the Department for Communities and Local Government(DCLG) asserted that it was the promoters (O&H) responsibility to engage the local community.

Prior to the first consultation deadline of 30th June 2008, the ONLY public meetings held were organised by Action Groups. It was they that warned the bulk of local residents of the massive scale of the proposal – not O&H or DCLG





O&H promised to make amends for their failure to meet with government consultation requirement by delivering 15000 leaflets “to every home and business in the Vale”. These leaflets were never delivered.

When O&H finally ran their Roadshows in October they were reluctant to provide any up to date information yet they had already completed an Update in August 2008.

DCLG started Phase 2 of the eco-town consultation on 4th November 2008. Just FOUR days later they held a Roadshow at the Marton Vale Forest Centre. This venue has no public transport. The event was not advertised in public. Once again the Action Groups notified the local people, however DCLG refused to discuss 'individual schemes' with attendees.

O&H should have made their Transport Plan public at the end of October 2008. To date this document remains a secret – we believe this is because the truth of their proposal is too akin to any other housing development to even deserve the devalued “eco” mark.

Key Points

-  DCLG Consultation process has been very poor – lacking standards
-  Vision plan has been a smoke screen for O&H to hide behind
-  Access to information assumes people have computers and Internet
-  General public would be 'in the dark' without Action Groups

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Employment

DCLG said “Eco towns can harness the employment potential of local areas and the opportunity for expansion of eco-town technology to enable the provision of high quality employment opportunities and lifelong learning.

All projects look great as clean sheet “vision”. However the current situation in the area must be fully understood. When Yvette Cooper MP. Was the Housing Minister she said “ We need to learn the lessons too from both the successes and the mistakes of previous generations.”

Historically, Mid Bedfordshire has had very few major employers. It was an agricultural economy. For a short while, it benefited from substantial employment at the brickworks and Vauxhall motors in Luton. Neither industry survived.


For the past decade 'Out-commuting' has become the major source of employment for people living in this area. Most journeys are to London, Luton, Milton Keynes and Cambridge. Many rush-hour mainline train services are close to breaking point.

The small growth of local employment has been based upon the availability of major road links – the M1 , A1 with the A421 providing links to both.

Unfortunately these jobs are mainly in high footprint, distribution businesses which only require small numbers of lower skilled workers. In fact many of the jobs are so lowly paid that many of these business have to “bus-in” workers from outside the county. Even these 'new' employers are showing signs of contraction.

Many of the job opportunities the developer refers to are in the the dying auto sector. An enormous investment program in Environmental Technology is vital to correct the current jobs imbalance BEFORE any more stress is placed on the local job market by an ECO? town.

Key Points

-  ECO? Town will worsen already high levels of 'Out-commuting'
 -  Unemployment is already rising in the area – extra breadwinners will stress a fragile local job market
 -  New town will compete with Milton Keynes new 'Growth Area' jobs
 -  “Made in the Vale” is nothing but developer hyperbole
- where are the 'Green technology' jobs ??

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“Eco-towns should offer exemplary reductions in carbon dioxide emissions and ecological footprints to a globally sustainable level”.

There is little wind in the Marston Vale; on site wind turbines would not be viable. The O&H energy consultants, ENTEC, suggest that the turbines could be situated on ridges 10-20 miles from the vale. The 17MW of power being considered would have to be transferred away from the communities closest to the source of power into the Marston Vale. If these turbines are viable, let them be built for the benefit of their own local community.





Kitchen and garden waste is already collected and used for anaerobic digestion by the local authority. There would be little or no impact from the suggested food-waste collection.

The volume of biomass from garden waste would be low and is already used elsewhere; ENTEC suggested that “Bio fuel crops would be grown locally and the displaced food crops could be replaced by importing food from Russia: “as they have scope for improving the efficiency of their agriculture” This shows the ridiculous nature of the O&H claims. In fact the eco town would destroy large swathes of local agricultural land.

The energy from waste plant on O&H land “is no part of the eco town bid” and yet they are coupling the two. O&H have started to promote trebling the size of the plant. This would require importation of large amounts of additional waste into the heart of the eco town. It is believed that most of this imported waste would come by road.

The quality of housing proposed is exactly that which will be required for all new housing built at a similar time. Furthermore there is no commitment to reduce the carbon footprint of materials or methods for erecting the eco-town.

Key Points

-  **Sprawl of housing will make District Heating prohibitively expensive**
-  **ECO? Town will only be at Building Standards Code Level 4**
 - well below the norm for 2016 at Code Level 6
-  **Importation of wind power & Energy from waste is `Green Wash`**
-  **Destruction of local farming will add FOOD miles and national IMPORTS**

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Housing need

**O&H say “The Marston Vale has capacity
for about 15000 dwellings”**

Our established planning system is a complex arrangement designed to couple the needs of both society and the individual needs of communities and balance the avaricious nature of property tycoons.

There is demand for reasonable organic expansion spread throughout the Vale and Bedfordshire, the existing Local Development Framework and Regional Plans are matching that demand up to 2021.



The government sponsored eco-town is supposed to start building in 2012. This timescale is in conflict with well established process and will invalidate all the good works of decades of proper planning rigour.

O&H have outstanding planning permissions for over 1000 homes in the Vale. They could deliver 300 social homes. This would satisfy local need within the Vale for affordable housing.

The imposition of 15,500 homes in the rural district of Mid Bedfordshire is on top of the East of England Plan target. There is no proven demand for such a massive development in the area.

The House of Commons Environmental Audit Select Committee is a cross party committee of MPs who met in late October. Their conclusion to their extensive report said “ In the light of the dramatic financial events of the last few weeks, we recommend that the Government revisits the extent to which a target of 3 million new homes by 2020 is realistic and viable. In revising its targets, the Government should not seek to water down its environmental ambitions, but should rather seize the opportunity to strengthen them, at the same time helping the economy by investing in the skills and supply chains needed for a step-change in environmental construction standards.”

Key Points

-  Empty homes could quickly yield 1.2m of the “Three Million Target”
-  Environmental Audit Select Committee considers ever increasing housing number as unsustainable and calls for reappraisal of targets
-  Delivery of well planned homes and infrastructure in the Northern Marston Vale is under threat from rushed through 'ECO? Town' plots
-  Area already has largest East of England housing growth target of 26%

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Land Use and Landscape

The Community Forest programme will cover a 40 year period to 2030 but some improvements are already tangible. We will not reap all the advantages in one lifetime, but significant benefits will flow from the early years. Community Forests will be a legacy for the future, to be used, cherished and enjoyed by our children and future generations.

This conclusion from the Forest of Marston Vale talks about a legacy for future generations.

Government stresses the need to cope with climate change in the “Living a Greener Future” documentation. However one of the greatest ramifications will be preserving the availability of land suitable for growing food.





The Government's own planning policy statement (PPS7) values Grade 3 land nearly as highly as the 'Top' two grades. For some reason the Sustainability Assessment for the Marston Vale site claims there is NO farmland of value, however the document contains many other serious flaws.

Given the high levels of Air pollution and nuisance suffered as a result of Brick-making and Landfill we believe that to immediately impose new development upon the area is both unjust and environmentally unsound.

Nature has shown its great power in recovering from Man's excesses during the last half century. However the period to 2030 should be a peaceful reward for the communities that have 'done their bit' and also enable the Community Forest time to take hold.

There is little opportunity reduce the quantity of contaminated land as the bulk of Brownfield land is in the North of the Marston Vale. Furthermore the developers have no plans to restore the areas which were flooded after clay extraction.

Key Points

-  Existing landscape is no longer 'Despoiled'
-  Sustainability Assessment contains too many errors and bias
-  Local residents have suffered all the pollution and inconvenience of the brickworks then landfill – some consideration is long overdue
-  Agricultural heritage of the Vale will be devastated

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Planning

David Lock Associates state “The Marston Vale remains one of the few parts of the Eastern Region with significant tracts of land with no strategic planning designations”

The inference of this statement is that the whole of the UK is up for grabs. That is not a sustainable state of affairs and flies in the face of a very well developed and sophisticated planning consultation system.

Much of this proposed development is on land rejected by the proper planning processes. The “Vision’ of using farming land, has not even been put to the current MBDC Local Plan.

All regional plans clearly identifies five URBAN areas including Bedford/Kempston and the Northern Marston Vale. While O&H refuse to give detailed information regarding the detail of their “Vision”, Mid Bedfordshire is the target for the bulk of the “series of sites”





Outside of GROWTH AREAS and nothing more than a SPRAWL even David Locks' own Town and Country Planning Agency 'Best practices guide' acknowledges the danger “that the latest town expansion is so removed from the heart of the place that it might as well not be part of the place at all.”

The Southern Marston Vale is identified for regeneration as the Forest of Marston Vale. Only organic development has ever been proposed as part of that initiative.

The Mid Bedfordshire District Councils' Local Development Framework is on target to match all of Central Governments highly ambitious housing demands by 2021.

The ARUP report for East of England highlights the cumulative effect of diverting investment from planned development and concludes many of these are now 'at risk'

Key Points

-  O&H “Vision” is neither Urban extension or Distinct settlement
-  'ECO?' Town puts existing growth and regeneration 'at risk'
-  Sprawl of commuter estates is out of character with county traditions of Market Towns and Rural villages – lacks any heart
-  Subsumes local villages and coalesces Milton Keynes with Bedford

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Transport

The DCLG Sustainability Appraisal is proposing “that more than 50% of trips originating in the Marston Vale eco-town will be by sustainable modes of transport.

Or, expressed slightly differently, up to half of journeys can be by car !

Even the most successful European schemes have found great difficulty in parting people from their cars. By building these estates so close to Junction 13 of the M1 the government is making their task of 'realigning attitudes' doubly difficult.





O&H's “Vision” persists with the concept that the Canal 'could be' a major transport route, this is plainly nonsense as little or no low-value bulk needs to be moved around the Vale along the possible line of the canal.

The Bedford to Bletchley line cannot possibly provide a 'turn-up and go' service and yet this is still shown in the O&H “Vision”

The developers have fallen back on one of the oldest forms of public transport – the bus.

CarFreeUK's guide to developers say “Public transport should provide direct links to all of the principal destinations surrounding the neighbourhood or settlement and enable onward journeys to other destinations, bearing in mind that bus-to-bus interchange is likely to be viewed as the option of last resort for many people.” Yet O&H are now proposing bus-to-bus interchanges at the ends of their housing estate circles.

Key Points

-  Local Traffic Plan (LTP2) has no provision for the ECO? town
-  No innovative 'Eco Technology' proposed for alternatives to cars
-  Most homes will be close to 'New A421' and Junction 13 of the M1
-  Plan relies on the building of a brand new major 'ECO? Road' through the middle of the Marston Vale

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Waste

O&H say “Eco-towns are expected to be exemplars in sustainable waste management and recycling at the community level.”

O&H have stated that Energy, Water and Waste are the three novel technologies their attempt at an eco-town will provide.

Their originally envisioned 'Envac' system is based upon 500mm diameter carbon steel pipes. It is used in high density developments with small geographic spread to encourage compliance with recycling targets by offering user convenience. 'Envac' requires energy to operate and is likely to reduce the local availability of jobs. It would be cost prohibitive for the 8Km long building sprawl proposed by the developer. The installation and operation of 'Envac' is therefore of no environmental benefit and will be rejected.





Mid Bedfordshire has achieved high levels of recycling through excellent community cooperation at low carbon cost including the 'BioGen' kitchen waste scheme.

The David Lock Associates “vision” for waste is therefore severely flawed in that it is at best identical to current standards for ordinary housing estate developments within Mid Bedfordshire and hence not visionary; merely compliant with current building requirements.

The Energy from Waste scheme(s) O&H are attempting to engineer on their land at Rookery Pit are an aside from the ECO? Town proposal.

The outputs from the plant are thermal energy (Heat) and the greenhouse gas carbon dioxide (CO₂). Given the absence of committed industry, civic or agricultural demand this represents the least environmentally sustainable solution. The only prospect is to make the highly inefficient conversion into electricity – this clearly demonstrates the developers and DCLG's lack of 'eco' commitment .

Key Points

-  Waste to Electricity is inefficient use of resource
-  Envac system is costly and unsuited to a sprawl of housing estates
-  Extra homes will create extra waste
-  Without “innovation” the proposals are merely commuter suburbs

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O&H `Update of the Vision - Aug 2008` promotes the concept of “The Marston Vale Broads”

There is no commitment by the developers to fund the provision of the Grand Union to Bedford link. Yet their documents appear to be promoting the area as a “Mini-Venice”. This may do much to enhance the potential price of land, and hence property values, but provides an unrealistic view of the likely provision of infrastructure.

If there was a serious attempt to make this area “ZERO WATER self-sustaining” the purity of the water in the Lakes would be paramount and no Fuelled craft would be permitted.

This typifies the “hoped for” best of all worlds, pie in the sky 'visions' which are promoted. Very little will be delivered – other than the standardized “Yet another car based 'eco-aware' suburban town”

The Environment Agency themselves in their document `Hidden infrastructure` acknowledge the difficulty of seeking a less well established solution to a well established problem :-
“An alternative approach to surface water drainage, known as SUDS, can reduce and slow down runoff at the same time as improving water quality. The systems mimic the natural drainage pattern of each site as much as possible, incorporating features which prevent or delay runoff, like permeable surfaces, artificial wetlands or ponds. These can help to prevent large flows of often dirty runoff that characterise urban drainage. Instead cleaner water is returned more gradually to the natural drainage system.

The SUDS approach generally costs about the same as traditional systems, but drainage legislation is complicated. It is not clear who will take ownership and who will be responsible for ongoing maintenance. This has made their incorporation into developments difficult in the past”

Key Points



Sustainable URBAN drainage systems in a RURAL clay soil location ?



No commitment to funding of end to end CANAL extension



Area has “Already stressed “ water delivery systems



Innovation will be difficult with competing uses of “BLUE CORRIDOR”

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