

BEDFORD BOROUGH LOCAL PLAN 2040

RESPONSE from ELSTOW PARISH COUNCIL

OVERVIEW

This document represents the considered response of Elstow Parish Council to the strategic proposals set out by Bedford Borough Council (BBC) in their consultation conducted June to July 2022.

Parish Council Approach to the Consultation

Elstow Parish Council is experienced in understanding the due process relating to public consultations and is therefore mindful of the importance of presenting clear and robust evidence at all stages, but in particular at this part of the consultation process, to ensure that Elstow Parish Council makes clear its view as the first tier of local government. The Parish Council, has a further role as always, serving its electorate and ensuring they are supported throughout this phase, so considerable work has been done ensuring they are not only aware of the proposals and their direct impact on Elstow, but also in engaging effectively in the consultation process.

The Parish Council also feels at this stage in light of the Local Plan shortly being taken forwards to government inspection, that with such significant development earmarked for both employment and housing in the parish of Elstow within this strategy document, that it is important to reiterate items that have previously been expressed in earlier consultations relating to the Local Plan through to 2040.

Elstow Parish Council, as usual, has been extremely pro-active in attending BBC led consultation events directed at local parishes, as well as the various public engagement activities within the consultation run by BBC. There has been a thorough review of the consultation documents, throughout the consultation period, as Parish Councillors have strived to understand more about the many different technical and complex items being considered. This is in addition to a huge number of important accompanying planning policy documents which will shape the future of Elstow and communities across the Borough.

The Parish Council has facilitated a number of different ways to encourage Elstow residents to engage with this consultation process, whether directly to BBC representatives or through feedback to Elstow Parish Councillors. Throughout this consultation it has remained an absolute priority that all in Elstow are aware of the enormity of the proposals, and that they can have their say and their voice heard. This has included using a website publications, social media posts, information in local shops, in addition to multiple leaflet communications made to the village population through along with residents being welcomed to the June and July Parish Council meetings. The Parish Council also arranged a specific drop-in session on Tuesday 26th July at Elstow Playing Field Hall to enable residents who had questions understanding and/or required assistance with engaging to the consultation. The Parish Council knows the proposed allocations within this consultation are of interest to residents as the drop in session was so well attended.

It is also important to recognise that Parish Councillors are lay persons, volunteering their time, trying their best to review, consider and digest all the information relating to many different technical aspects of this Local Plan process. In addition, the volume of associated policy documents being consulted on, which again are also complex, however, are fundamentally crucial in the important role they play in the wider context of the development strategy.

As a result, it was important to Elstow Parish Council that they focus on the impact the proposed allocations have on Elstow and the surrounding areas - the area known best to Councillors.

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RESPONSE SUMMARY

The Council has developed comments relating to a number of different policies of the Plan document, these will be expanded upon later in this document under the requisite headings.

1. Fundamental unsoundness of the Plan

The Parish Council feel it is important to set out concerns relating to the soundness of the Local Plan which result in the Plan not being fit for purpose.

2. Misleading consultation representation

The Elstow community feel it is important to recognise that the document has been misleading in how the specific site policies have been presented which has resulted in misleading representation. The information has also been unclear as it is difficult to understand the site locations.

3. Specific Planning Policy relating to Elstow Parish

The Parish Council wish to highlight the importance of the character of Elstow, not only in terms of its unique historical character, but also in light of its planning policy management relating to the Urban Area Boundary.

4. Potential adverse effect of major development nearby to Elstow Parish

There have previously been expressed many concerns about the Plan generating large growth in Elstow, which would result in a complete change of character of the village. Reasons against any substantial development are many and listed under this heading later in the document with the main focus on Policy HOU5 Abbey Field West of Elstow, and Policy EMP5 Land at Pear Tree Farm, Elstow. This section focuses on HOU15 Land South of Wixams, Policy HOU16 Land at East Wixams, HOU17 Land at College Farm, Shortstown and Central Bedfordshire.

5. Coalescence

The increasing size of Wixams, Shortstown, Elstow and Cotton End threatens the separate identity of Elstow which needs to be clearly maintained.

6. Historic buildings and heritage assets

Development in such close proximity to such assets and understanding the rich history of Elstow which will be directly affected by the proposed allocated sites.

7. South of Bedford Policy Area Topic Paper

The Council will set out its response to this specific supplementary planning policy document.

8. Policy HOU5 Abbey Field West of Elstow, and Policy EMP5 Land at Pear Tree Farm, Elstow

This part of the response will focus on the issues and concerns relating to both Policy HOU5 Abbey Field West of Elstow, and Policy EMP5 Land at Pear Tree Farm, Elstow.

9. Mitigation measures

Without prejudice, the Parish Council feel it is necessary to include a comprehensive summary of adequate mitigation measures that must be provided and representation at all stages as a major key stakeholder, if Policy HOU5 Abbey Field West of Elstow, and Policy EMP5 Land at Pear Tree Farm, Elstow were to be taken forward.

10. Conclusion

This sets out the Parish Council overall feedback to the consultation.

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SECTION 1: FUNDAMENTAL UNSOUNDNESS OF THE PLAN

The Parish Council having reviewed the Local Plan and associated planning policy feel the document is unfit for purpose and unsound as it does not meet current National Planning Policy requirements.

The document is unsound as it fails to meet the fundamental requirement of achieving sustainable development, as set out in Section 2 of the NPPF 2021. The areas in particular which are not met, are the overarching objectives, *“which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

9. These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.

10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).

11. Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

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- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

Furthermore, para 16 of the NPPF expects that:

“Plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable development*¹
- b) be prepared positively, in a way that is aspirational but deliverable;*
- c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).”*

This non compliance shows the draft Plan is unfit for purpose.

¹ ¹¹ This is a legal requirement of local planning authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act 2004)

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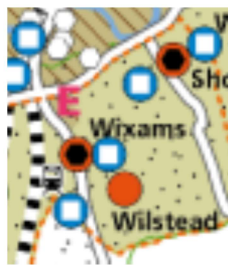
SECTION 2: MISLEADING CONSULTATION REPRESENTATION

It has been clear from resident feedback that throughout the formal consultation process the information has been challenging to fully understand and appreciate where exactly the strategic growth is being proposed. A number of the key documents which have been used to show overall growth, has been misleading which as a result has meant many local residents were not aware of any sites within Elstow being included.

The Parish Council would like to highlight a number of fundamental flaws to the consultation document relating to the misleading presentation of Policy EMP5 and Policy HOU5 which have not been helpful representations for the Elstow community.

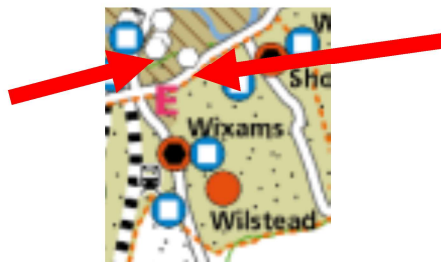
In general, it is reasonable that at most, members of the public will glance or briefly scan such a local authority document at best, whether that is the literature produced in text, or visual format. For many, on doing that it appeared that the draft Local Plan 2040 document showed no allocation for Elstow.

Figure 12 Key Diagram, Page 83 in the consultation document sets out an overview of proposed development for housing and employment sites. There was no reference of Elstow on the Figure 12: Key Diagram which the local authority used in their promotional information of the consultation. The marking of the map again is misleading in how it represents the sites – mainly due to its coarse scale which makes it a poor complement of the LP2040 document and it fails to identify Elstow as illustrated below.



The geographical misrepresentation of Wixams illustrated above and no Urban Area Boundary being shown it was even more unlikely that villagers could not understand the map as they could not relate to it. This was fed back to the Councillors by a significant number of residents.

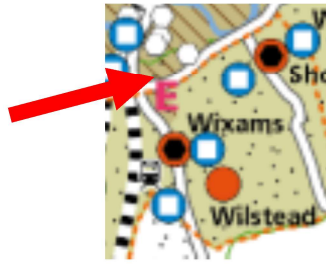
Also it is particularly unclear where the sizeable allocation known as Policy HOU5 is, it should be represented immediately adjacent in a north position to the 'E' shown below. Which white area is HOU5 supposed to be?



The above shows the apparent overlapping of housing allocation sites quite some distance from the crossing of the two highways routes, the A6 being represented by the north to south white

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line and the A421 Bedford bypass being represented by the east to west white line. The site sits in fact where the red arrow below is pointing to.



This misrepresentation of information will have resulted in many not understanding the proposals as often when individuals see no direct impact they do not go into a more in depth review of the consultation and therefore are unlikely to give feedback, or engage in the consultation process. This is relevant to those that live in Elstow, as well as those who live nearby in Wilstead, Wixams and other local communities, who also have been misled. The knock on impact of this will also spread beyond the nearest settlements.

By doing this it feels like an attempt from the local authority to disguise significant development for the village community.

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SECTION 3: SPECIFIC PLANNING POLICY RELATING TO ELSTOW

Village Overview

Elstow has seen change of a massive scale in recent years. There is the development of Progress Way/Hillesden and Abbeyfields estates [which quadrupled the number of residents living in Elstow], the huge Interchange Retail Park, which is expanding further with the B&Q and M&S additions, whilst the access road is nowhere near suitable. The development of the A421 bypass split the village and the construction of the BP station and hotel simply added to the police crime list. There have been a number of infill developments within the village with more in the “pipeline”, including the old school site. There is also the park and ride, the massive Health Care Logistics/Audi complex, in addition to the large retirement complex.

Apart from the re-location of the school to its current site, and increased size, in Abbeyfields, there has been no increase at all in the facilities in the parish as a result of these changes, in fact there's been a decrease following closure of the Swan pub, a middle school, and shop at Peartree View.

There has continued to be significant increases in through traffic and their speed in the village, to the disadvantage of local residents, and clearly this would increase if further development were to come to Elstow or the surrounding area.

Elstow is a rural community, which is vitally important to retain, through securing its rural feel by maintaining a large number of green spaces, such as through strategic gaps between settlements and important views into the surrounding open countryside.

Site EMP5 earmarked for ‘a modern research campus-style development, primarily for research and development with elements of manufacturing, warehousing and distribution’ in terms of local context does not sit naturally alongside a linear rural settlement.

Site HOU5 earmarked for residential use sits a substantial distance from any existing rural settlement, in fact being quite detached from the Elstow community.

Both EMP5 and HOU5 are not sensitive to the local landscape and setting which will be detailed greater below.

Current Local Planning Policy applicable to Elstow

Elstow has always been recognised as being unique in all previous framework and development strategy documents. This is even documented in the Borough Council's planning framework document, Allocation and Designation Local Plan 2013 which in Section 15 deals with the urban area boundary and local gaps. Policy AD42 specifically deals with coalescence between settlements and the importance of local gaps, aiming to prevent ‘*coalescence between the urban area and nearby villages*’. This 2013 Plan document has not been superseded by the adoption of the more recent Local Plan 2030 strategy framework document, so it is important to be aware of the policy as it is still relevant.

Furthermore, Policy AD42 (Local Gaps) with its supporting text clearly sets out that:
'In this respect local gaps will be protected, not only from development that would lead to a physical joining of settlements, including that which might normally be considered to be

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acceptable development in the countryside, but where possible also from an increase in levels of activity which would reduce the distinction between leaving one settlement and arriving in another. This policy takes account of the principle that the essential feature of the gaps can be purely the absence of development and activity rather than necessarily its landscape quality.'

Paragraph 15.9 goes on to also explain that the policy “*also takes into account that local gaps are generally narrow and limited in extent such that any development could seriously affect their openness and could be seen as contributing to visual or physical coalescence. The appropriate width of a local gap is likely to be no more than 1 mile (1600 m) in extent and may be much less.*”

This is further reinforced by the reference that recognises Elstow

2.37 The settlement of Elstow can be considered in two parts (apart from the area south of the A421 which has been considered earlier in this project as a potential addition to the urban area). The northern part comprises an historic core along the High Street and around Elstow Abbey, together with later areas of housing along West End and at Bunyans Mead on the east side of the High Street. Most of the development in this area is currently within a defined settlement policy area. Open land separates this northern part from other areas of development to the west and east, however to the north it immediately abuts development within the main part of the urban area.

2.38 The southern part, between Elstow Brook and the A421 comprises development which primarily fronts Wilstead Road. This area does not currently have a defined Settlement Policy Area. Open land separates it from other areas of development to the west and east.

2.40 From this analysis, in terms of visual attachment it can be seen that the selected areas within the northern part of Elstow are distinct from the selected area south of Elstow Brook. The northern part is itself varied, with the Bunyans Mead area very similar in density, built form and type of building to the nearby built-up area, with both having a suburban feel. Conversely, the West End and High Street areas are quite different from nearby built-up areas to the north and east. The historic core of north Elstow, around Church End and the High Street retains a village-like character consisting largely of closely spaced individual dwellings in the High Street and a distinctive open character around Church End and Abbey Close. Nevertheless, this is only a small part of the current settlement and overall the northern part of Elstow can be considered to be primarily suburban in character.

2.41 The southern part of Elstow is completely different from the built-up areas to the east in terms of density, built form and type of building. It has a distinctly rural-like feel.

The extracts above show that Elstow manages in its current form to retain its rural nature. Paragraph 2.44 goes on to highlight: *Looking at the land use and character of the open land in the northern part of Elstow, to the west the open land is used for agriculture between the Abbeyfields road and the A6. Between Abbeyfields road and the settlement the open land is variously rough grassland, woodland and mown grass. The character therefore changes from being distinctly rural in the west to becoming more managed and enclosed closer to the settlement.*

Focusing on the policy wording, it would therefore be totally contradictory to place HOU5 in this pocket which is described as being a *distinctly rural* part of the village.

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The AD41 Policy document goes on in Paragraph 2.47 to detail that *the southern part of Elstow can be considered to be rural-like in terms of visual attachment*. It would therefore be totally contradictory to place EMP5 in this area which is described as being rural and also contains ribbon like development along Wilstead Road which runs alongside the EMP5 site boundary.

During the preparation of the document previously known as Local Plan 2035, which went on to be adopted as the Local Plan 2030, at no point did it include any intended changes to the Urban Area Boundary policy AD41.

Located on Bedford Borough Council's Development Plan documents webpage is a link to the Bedford Borough Local Plan 2030 document that was adopted on 15th January 2020. On Page 189 of the document, it clearly shows that AD41 are current.

Allocations and Designations Local Plan Policies (2013)	Status – Delete, replace or save	Proposed policy in Local Plan 2030
AD39 Cycling	Save	
AD40 Village Open Spaces and Views	Save	
AD41 Urban Area Boundary	Save	
AD42 Local Gaps	Save	
AD43 Urban Open Spaces and Gaps	Save	
AD44 Former Land Settlement Association Area	Save	

Important Local Planning Information

The Parish Council would like to draw the Inspectors attention to recent planning application for development of 34 houses at Village Farm, which is along Wilstead Road. The application was recommended for refusal by Borough Officers. This again re-enforces the supporting planning policy reasons as to why these areas are so important in terms of Elstow's character and history. Below is the extract from the 2015 report prepared by Planning Officers:

The Urban Gap was identified in the Urban Area Boundary Review as a means of preventing coalescence and to contribute to the separate character and identity of the settlement. The quality of the landscape is not considered in the designation of an Urban Gap. Whilst the Urban Area Boundary Review states that the green spaces cannot be considered countryside due to being surrounded by development, it does identify this particular area of Elstow as having a rural-like character, which is contributed to by the historic farm buildings that front onto Wilstead Road. It notes generally that the Urban Gaps in this area provide a separation between the historic core of Elstow village and the more suburban character of more recent surrounding development.

The proposal does not allow for the retention of any green corridor to the northern Urban Open Space, occupying as it does the entire space between the rear of the buildings on Wilstead Road to the west and Elstow School to the east. The proposal includes an area of open space between the southern and northern parcels, but this does not address the reasons for the Urban Open Space and Gap designations. The site assessment that was completed as part of the Allocations and Designations Local Plan acknowledged that the site would represent

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development into an open space that provides a buffer against coalescence, a point backed up by the reason for the Urban Open Gap designation. In its present form the proposed development would conflict with the rural “feel” of the area. It would effectively remove the green corridor linking in to urban open space in the north as well as the gap between the suburban development of Abbeyfields and the more rural feel of Wilstead Road and it is considered that this compromises the purpose of the Urban Open Space and Urban Gap. - 83 - Heritage Issues.

Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a statutory duty on LPAs to have special regard to the desirability of preserving listed buildings, their settings and any features of special architectural or historic interest they may possess; and preserving or enhancing the character or appearance of a Conservation Area. Saved Local Plan Policies BE11 (setting of Conservation Areas), BE21 (setting of listed buildings) and Policy CP23 of the Core Strategy reflect those duties. Chapter 12 of the NPPF sets out the Government's national policies on the conservation of the historic environment. The site lies to the southeast of the designated Elstow Conservation Area and the Grade I listed Hillersdon Manor, also a Scheduled Monument. There are numerous listed buildings along Wilstead Road, including Acacia Cottage, Village Farm and curtilage listed barns, 193 Wilstead Road, Merrick Cottage and Lynn Farmhouse, all listed Grade II.

Part of the significance of these listed buildings is their historic interest. The character of the road, including both the settings and contexts of the above heritage assets, is the semi-rural nature of this ribbon development. This road distinguishes the change in character on entering and leaving Elstow Conservation Area. Therefore, the retention of the semi-rural character of this area is important both to the context of the Elstow Conservation Area and the setting of the identified listed buildings.

A development of 34 dwellings on the site would undermine the semi-rural character of this area and would thus create a much more urban setting to the identified listed buildings. The semi-rural setting of Village Farmhouse and associated traditional agricultural buildings is important to the historical development of the original farm complex and further erosion of the setting would be considered harmful to this identified significance. Two access points into the development have been proposed, in particular that adjacent to Village Farm barns has the potential to over formalise this area through the hard landscaping required. This could further undermine the semi-rural character of the settings of the identified barns and Village Farmhouse. The historical significance of the ribbon development pattern along Wilstead Road would also be further undermined by the infill of land to the rear of the properties to the east of Wilstead Road.

The Conservation Officer therefore advises that that the application would fail to preserve or enhance the setting of the identified listed buildings.

The proposed development site is located in an area of cropmarks comprising a number of ring ditches and linear features some of which have been previously investigated both as part of the bypass investigations and also the school to the east. The investigations identified remains of Late Neolithic/Early Bronze Age ring ditches, an Iron Age settlement, and settlement from the Saxon through Medieval period also. In addition to this the HER records the presence of a possible small Quaker burial ground within the site, traces of gravestones are recorded as being visible possibly as late as the 1950s in local newspaper articles.

In conclusion, the proposed built development would result in a significant incursion into the urban open space and gap which would be harmful to the character and appearance of the area. The development would also undermine the semi-rural character of the area and would thus create a much more urban setting which would be detrimental to the setting of the Grade II Listed Buildings at Acacia Cottage, Village Farmhouse and barns, 193 Wilstead Road, Merrick

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Cottage and Lynn Farmhouse. It would thus fail to meet the statutory duty under s66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to preserving the setting of listed buildings.

RECOMMENDATION: *Refuse Permission for the following reasons:-*

1. The proposed built development would result in a significant incursion into the urban open space and gap which would erode the visual break between the historic core of Elstow village and the more suburban character of more recent surrounding development and result in the loss of the green corridor linking in with the urban open space to the north. The development would therefore compromise the purpose of the urban open space and urban gap and be harmful to the character and appearance of the area, contrary to saved Policy BE30 (i) of the Bedford Borough Local Plan 2002; Policy CP21 (iii, vii) of the Core Strategy and Rural Issues Plan 2008; and Policy AD43 (viii, ix) of the Allocations and Designations Plan 2013. - 90 -

2. The proposed development, by virtue of its scale, siting and layout would undermine the semi-rural character of the area and would thus create a much more urban setting which would be detrimental to the setting of the Grade II Listed Buildings at Acacia Cottage, Village Farmhouse and barns, 193 Wilstead Road, Merrick Cottage and Lynn Farmhouse. The development would therefore be contrary to saved policy BE21 of the Bedford Borough Local Plan 2002 and policy CP23 of the Core Strategy and Rural issues Plan 2008.

Summary

This clearly shows that the allocation of HOU5 and EMP5 are in breach of the Borough Council own planning policy, that aspects of Elstow and its immediately surrounding open countryside must be protected in order to retain its character, setting and separate identity.

Whilst the Parish Council have made their desire very clear on multiple occasions to Planning Policy Officers, to see greater protection for all local green and open space areas within Elstow that lay between the various ribbon areas of the village. It is understood that there is no intention for the Urban Area Boundary to be changed that affects Elstow parish, however, policy AD41 makes it clear what a rural community Elstow is.

Also referenced on the above diagram is Policy AD42 which also remains relevant regarding Local Gaps.

The above planning policies remain in situ, valid reasons as why development in Elstow would contravene the existing policies.

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SECTION 4: POTENTIAL ADVERSE EFFECT OF NEARBY MAJOR DEVELOPMENT TO ELSTOW PARISH

Proposed Allocations Objections

Substantial development has been included in the Local Plan document with EMP5 and HOU5 both within Elstow parish. On review of Document 52 Changes to the Policies Map it further highlights the encroachment from Policy HOU16 Land at East Wixams in particular. In light of this very sizeable allocation, the Parish Council is also mindful of the large allocation for Policy HOU17 Land at College Farm, Shortstown which will be addressed as well in this response as it virtually adjoins HOU16.

If HOU16 and HOU17 allocations were taken forwards as strategic growth options by the local authority, they would most likely consist of estate-type development which would be out of character with the rural, multi-age and mixed style of the current range of dwellings and rather worryingly create a broad swathe of dense development in the immediate area.

In addition for site HOU5 if it were to be developed it would mean it would be totally necessary for people to have to travel by car into other communities, as these resources are not nearby in light of the isolated location of the pocket of housing.

- Schooling (insufficient places available locally)
- Shopping (local store cannot supply the range of goods required)
- Health facilities (limited locally)
- Onward bus or train travel (limited services, considerable travel time due to insufficient highways network capacity)

Policy HOU16 Land at East of Wixams

In addition to the Parish Council objecting to HOU5 and EMP5 proposed allocation for the planning policy reasons set out above, the Parish Council wish to highlight in particular that for HOU15 for this site, the detrimental impact in terms of coalescence with Elstow village, in particular the South Avenue part of the village.

The location of this site is a real concern as it sets total precedent for high density estate development east of the A6 within Elstow parish. For many years land that side of the A6 and the village road into Elstow has been put forward for planning, and refused, rightly so. Such an allocation with Policy HOU16 is going to have a significant knock on effect.

The proposed Settlement Policy Area for HOU16 also extends a long way eastwards, again a concern given the large land masses nearby in Elstow which have received planning applications for housing development. Whilst they have been refused previously, it does bring concern that this allocation could bring precedent.

The policy wording makes a brief reference to a long term buffer between Wixams and Elstow, however, this is not reflected in Figure 8 of the consultation document within the site boundary. This is concerning as in many other site maps illustrating proposed allocations there has been distinct reference already included of important areas identified as key open spaces even at this strategic level. Such safeguarding of areas can be included at this stage of the Local Plan, again this omission is concerning for the Parish Council.

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Equally for this Policy HOU16 site the Council feel in light of the landowner/site agent representations within the 'Call for Sites' process it is clear the site can hold significantly more than the 1800 proposed allocation. Given recent experiences of sites that have come forward, the Parish Council are mindful it is often the wish of the developer when bringing a site forwards to place as many houses on as possible to maximise revenue output. It is therefore reasonable that if this site remains included that it must have written into the strategic policy robustly a definite number of houses, along side the key earmarked open space areas to act as a strategic buffer. Without this change and inclusion within the policy there is no safeguard or protection for the site to not be fully developed and given the site has capacity to hold enough for a new town this is really a concern for the Parish Council.

Again the Parish Council feel that Policy HOU16 wording is not clear enough on a number of important factors that must be stated within the overarching policy if this site goes forward. There are again too many 'lose' words which during the development of Wixams resulted in so many expectations not being met, alongside with the limited local authority powers, it caused a lot of distress that facilities were not being progressed in a timely manner and many ultimately never were delivered.

Paragraph 4.87 makes no reference of the site within Elstow parish or its proximity to Elstow, these omissions are not acceptable.

The Metrological Research Unit at Cardington is referenced, having tried to better understand the impact this has on the site, in terms of planning policy, this is not clear. It would be reasonable for such an item considered to be so significantly important to be mentioned in the planning policy that somewhere there is clarity on what such a reference actually means along with the types of mitigation that will need to be factored in. The reference is made in both paragraph 4.87 as well as Policy number i. so it must be an important item.

Item iii. references transport improvements are required, in fact the development is dependant on it. Again the policy wording is insufficient and unclear, this needs to be defined.

The Parish Council feel that there needs to be more included with the Transport Assessment point number iv. it seems illogical that a site for 1800 houses has less requirements stipulated in the associated policy that Policy HOU15 which is to have 300 houses. Surely as a bare minimum the four bullet points contained within HOU15 should be referenced in HOU16. Along with, as mentioned previously, the local authority needing to have higher expectations and aspirations for further enhancements to the local network to maximise more sustainable methods of transport.

Policy HOU17 Land at College Farm, Shortstown

The local community will be able to offer comments on this proposed allocation for significant growth, however the Parish Council feel it is important that within the Policy HOU17 wording it makes reference not just to Wixams but the detrimental impact and clear need for mitigation in Elstow.

Central Bedfordshire

Elstow Parish Council do not feel assured that Bedford Borough are working with other Local Authorities to ensure a coordinated approach. The Parish Council have always been mindful that that Central Bedfordshire are growing with significant growth in many local areas. There is enormous growth only just a short distance along the A421 corridor with 5,000 houses currently

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at planning application stage for a strategically allocated site known as Marston Valley. But there is also more worrying continued large-scale development on the edge of the village (e.g. south of Wixams) which would further impact on the unique character of Elstow village as the local rural highways network is at full capacity.

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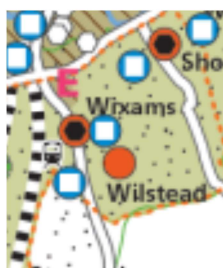
SECTION 5: COALESCENCE

The Parish Council can not reiterate how this aspect of the Local Plan as proposed allocations on multiple sides within and adjacent to Elstow are closing in, which bring increased worry over the rural village being totally engulfed. It is fundamental to safeguard the rural historic nature of Elstow that it does not become lost into Bedford and end up as an urban suburb.

There really needs to be a distinct difference between Elstow village and Bedford (to prevent “coalescence”) with the urban town, as well as between the very distinct communities of Elstow, Wilstead, Wixams, Cotton End and also Shortstwon so that their historically separate identities are preserved. The potential size of major development would threaten the very heritage of a village that is described in the Domesday Book.

The existing very stretched parish of Elstow would not tolerate further development on its edges without these developing into separate, isolated, communities in themselves, or necessitating car journeys to the centre. This is a concern to the Parish Council, as well as Elstow residents who have first hand experience of some of the challenges that developing like this already have. It has taken a number of years to integrate Abbeyfields, a new area of the community in with the older part of Elstow village. Growth in the wrong parts of a rural community will be damaging for not just the short term, but also for future generations to come.

Figure 12 Key Diagram, Page 83 in the consultation sets out an overview of proposed development for housing and employment sites. It shows a clear distribution of allocations heavily around the area south of the A421 now being defined as the South of Bedford Policy Area. However, the marking of the map again is misleading in how it represents the sites as it places Wixams and Elstow on the section of the map on the same side of the A6.



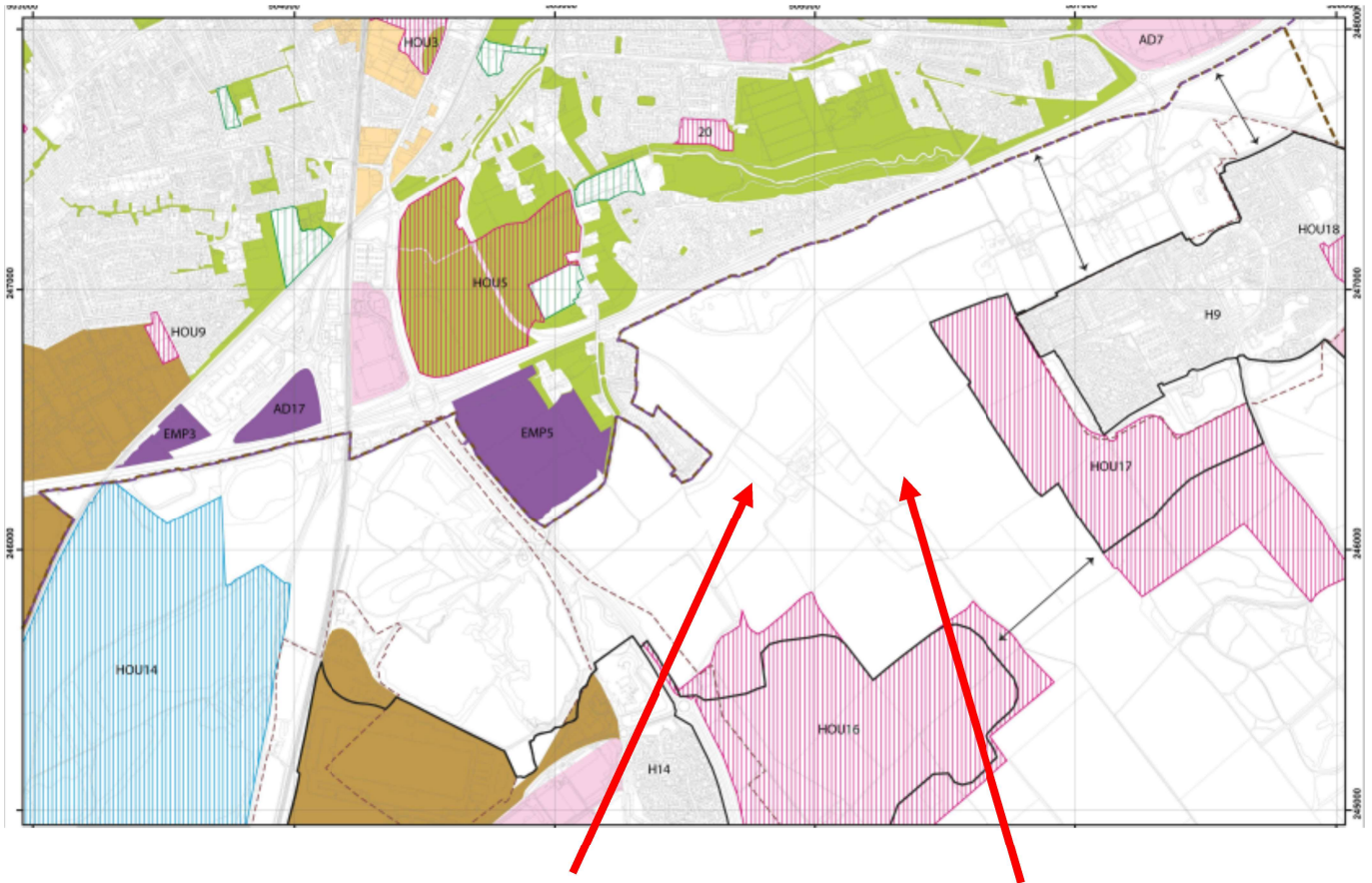
This is factually incorrect and is inaccurate.

Showing vague, poorly located blobs of roughly where allocations are is not helpful. Having spent more time looking at local policy maps relating to Elstow parish it has shown the clear issue with the allocations EMP5, HOU5, HOU15, HOU16 and HOU17 in terms of coalescence. It has already been raised there is noticeable development closing in on Elstow and looking at the local maps it is really evident, please see below.

The Parish Council feel that there needs to be more done to protect the parishes otherwise it will be one large swathe of development.

Map 8 in Policy 52 Changes to the Policies Map shows the level of coalescence.

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This will lead to the areas highlighted by the red arrows which are vulnerable, and them being lost along with the rural village identity of Elstow.

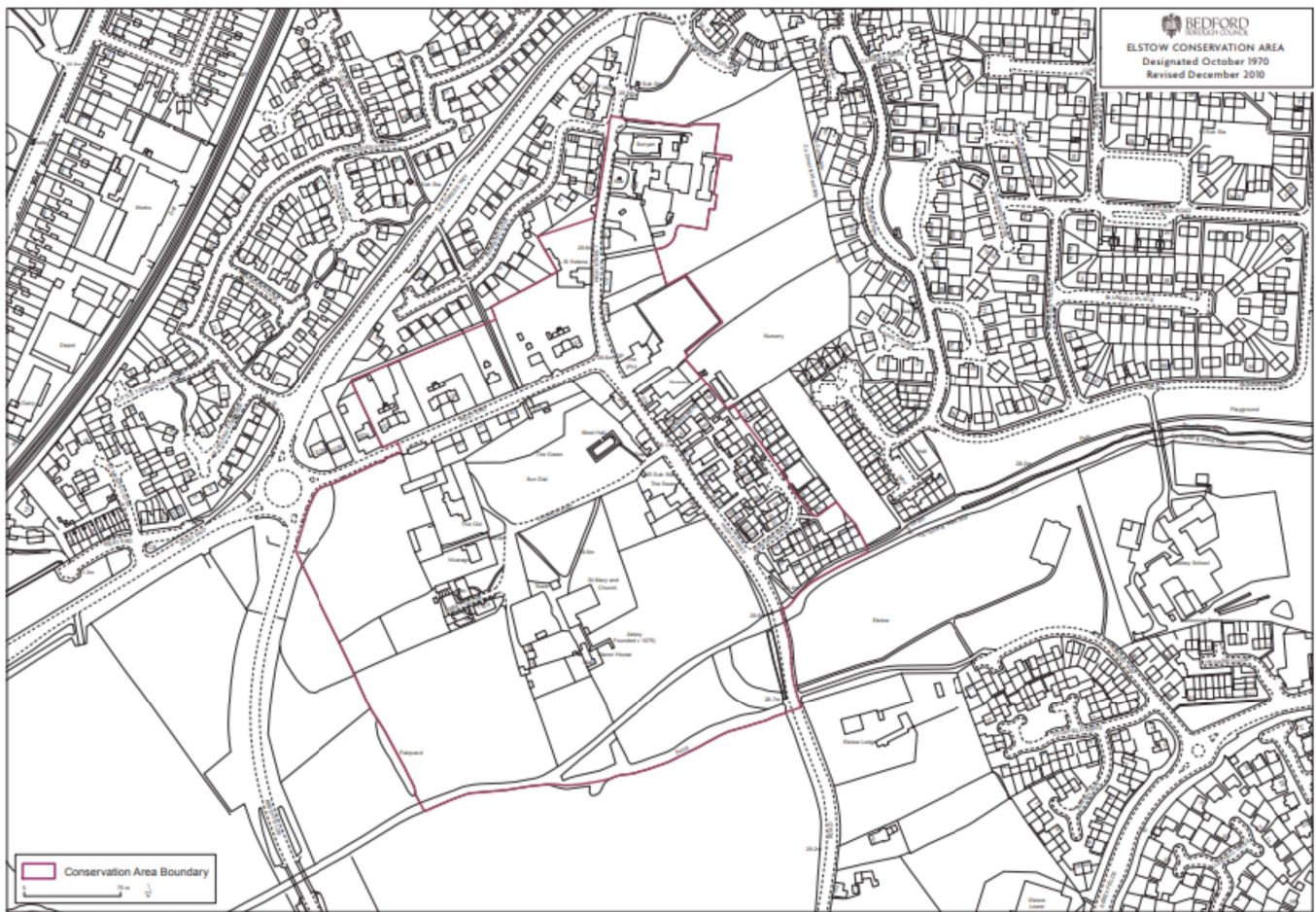
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SECTION 6: HISTORIC BUILDINGS AND HERITAGE ASSETS

The Parish Council feel it is important to outline some vital, important local factors, which will enable the Inspector(s) to be more aware of the issues within the parish when reviewing potential sites. In addition to the Conservation area, historic architecture of both Moot Hall and Elstow Abbey Elstow has a rich and diverse historic environment comprising archaeological remains, historic buildings, settlements and important local landscapes.

Elstow is proud of its heritage and has a conservation area, as identified on the map below which can be found on the local authority website at the following link

https://bbcdevwebfiles.blob.core.windows.net/webfiles/Files/CA_Elstow.pdf



HOU5 abuts the conservation on two sides, effectively enclosing the conservation area. Any proposed allocation on this site at HOU5 will detrimentally impact this uniquely recognised designated area. Absolutely, any level of development will significantly harm and risk the historic heritage assets.

There are numerous buildings which are within the area allocated, who would have there setting impacted not just in terms of local landscape or environment but many would also become impaired with a limited sight line being available to the listed asset.

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The Parish Council would like to reference Appendix A which clearly illustrates the high number of heritage assets, please see attached Appendix A Elstow_CAA_FINAL LOCAL PLAN EPC 2022. The document can also be found at:

https://bcdevwebfiles.blob.core.windows.net/webfiles/Files/Elstow_CAA_FINAL.pdf

With such rich evidence of so many historically recognised assets in close proximity, but in particular with Elstow Abbey, Moot Hall being adjacent/so close to the proposed site boundary, it is reasonable that these, and their respective settings, are afforded the highest level of protection and preservation. There is also clearly evidenced on the site assessment submissions by the land agent for both HOU5 and EMP5 there are a number of significant buried archaeological assets and standing assets within both site boundaries. Therefore, any such allocation will result in irreplaceable damage to the asset setting.

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SECTION 7: SOUTH OF BEDFORD POLICY AREA TOPIC PAPER

In light of the disproportionate strategic growth being focused on the south of Bedford area, the Parish Council feel it is important to comment on the subsidiary policy document, Policy 10. The document sets out a designation of an area based purely on it being known as the Marston Vale. The Parish Council feel this is a restrictive statement which is short sighted. It would be more logical to include other settlement areas, which are also allocated growth in the lifetime of this draft Plan, for example, Willington to be included as well given the River Valley Park asset and how Willington sits geographically alongside this area.

Going forwards it would be more logical if the policy designation is based on the Marston Vale area only, for the Developing in the Forest of Marston Vale: Design Guidance SPD to be fully incorporated into this document, rather than having it as a separate policy document.

Paragraph 4.3 makes no reference to the planted community woodland which covers an expansive area situated along Duck End in Wilstead parish, this appears an omission and the Parish Council would seek the same level of designation for this woodland as any others.

Paragraph 5.6 refers to the surface water run up from the new Kempston Hardwick settlement Policy HOU14 will go through Elstow Brook, this is a concerning statement not just in the knock on impact as the watercourse flows through Elstow, but also in how the surrounding wildlife and habitats will be impacted.

Map 5 shows an extensive flood zone classified as 3a going right through the HOU16 Land at East of Wixams, which reads therefore that the flood implications in this area are currently very high. So this would not be expected for an area allocated for 1,800 houses.

Maps 8 and 9, along with the accompanying Paragraphs in this part of the document are not explained very well at all. It is difficult to understand the point of all the different mapping which ultimately concludes that the main highways network routes are the where the biggest opportunities lie in terms of developing biodiversity and ecosystem growth. This seems an illogical conclusion.

Map 11 represents within the key Item 5 – Elstow South, showing the surface water run off. What is unclear and appears to be missing is any appreciation of the significant two planning applications currently in which refer to the permission that means the enormous water expanse at this location which if it were no longer to be there would impact the local watercourse network management hugely, appears to not have been taken into account.

The Parish Council feel it is very important that there be further challenges be made on the data provided by the local authority to make sure there is a full understanding of the water course levels and flood risk areas in particular with the very close proximity of not only the new settlement at Kempston Hardwick for Policy HOU14, but also the HOU16 allocation. More information and data is needed in light of 21/03307/AOC Discharge of Conditions Application PROPOSAL: Details for infilling and restoration pursuant to condition b (8) & 10 of planning permission 4/1980 for New brickworks at Stewartby to replace existing Stewartby Works and the excavation of clay for the new and existing brickworks and landscaping works at Elstow Pit South, Wilstead Road as well as for 21/03308/AOC Discharge of Conditions Application PROPOSAL: Details for infilling and restoration pursuant to condition b of planning permission 1913/9/1 to develop for excavation of minerals at Elstow Pit South, Wilstead Road.

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Paragraph 5.23 suggests that Wixams station is part of the East West Rail phasing work which is misleading. As Wixams community has grown for so many years with the promise of a new station which has not been delivered for so many years, needs to be clearer that in no way is the Wixams station reliant or connected in any way to the East West Rail route.

Again in Paragraph 5.28 it would be expected that there would be reference to the planted community woodland at Duck End, Wilstead.

Figure 2 as part of Paragraph 5.29 appears to identify a number of issues with the strategic allocated sites that lie within this policy area. With so many issues identified on so many of the sites it is a concern for the Parish Council.

Infrastructure

The Parish Council feel it is important also to again reference the poor modelling that is contained within other subsidiary planning policy documents, which does not take into account the effect on A6 traffic has been poorly researched. There has been no coverage of the increase in traffic likely from the Central Bedfordshire Local Plan which currently looks to be substantial in the northern part of their region. The growth located adjacent to the Wixams development as well as the 5,000 houses currently in for Marston Valley an allocated strategic growth site, not having been taken into consideration is short sighted.

This also includes pressures on bus service, GPs, hospital, primary and secondary Schools, which along side significant highways improvements will require enormous levels of funding and, from experience at Wixams, which Elstow Parish Council were involved in from inception, it is incredibly difficult during the sizeable growth of the area to meet the needs of the increased community. Like seen at Wixams it simply fails to meet the amounts required. This will result in compromises that will put extreme pressure on existing infrastructure which is already at capacity.

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SECTION 8: POLICY HOU5 ABBEY FIELD WEST OF ELSTOW, AND POLICY EMP5 LAND AT PEAR TREE FARM, ELSTOW

General Issues applicable to both HOU5 and EMP5

The village is an established 'rat run' which is well documented, as traffic comes into the village travelling in huge volumes during peak times. The most popular route is from the A6 travelling in both directions, along Wilstead Road, onto the High Street, then West End, through to the Cowbridge junction which even after numerous redesigns still suffers from monumental levels of congestion. There is also the Progress Way traffic flows which are significant as a popular route on the local network. The cumulative impact of both these makes highways a real issue in the local area throughout the week.

The popularity of Elstow Primary School attracts pupils from a wide area. It is located in Abbeyfields many travel to the school by car and on regular occasions cars are parked and there is total grid lock at the end of the school day. There has been a number of incidents in recent years involving pedestrians being knocked down. The school has been extended by two additional forms to create a primary school which has resulted in further pressure for parking. Elstow is rightly proud of its local environment, wildlife and heritage assets found throughout the village.

The abundant wildlife along Elstow Brook, in the meadows along Abbeyfields through to its infamous connection to John Bunyan. The Parish Council have a range of resources evidencing this which all act as further proof that Elstow is a unique parish. To change the setting of these world renowned connections that really are at the centre of Elstow would be devastating.

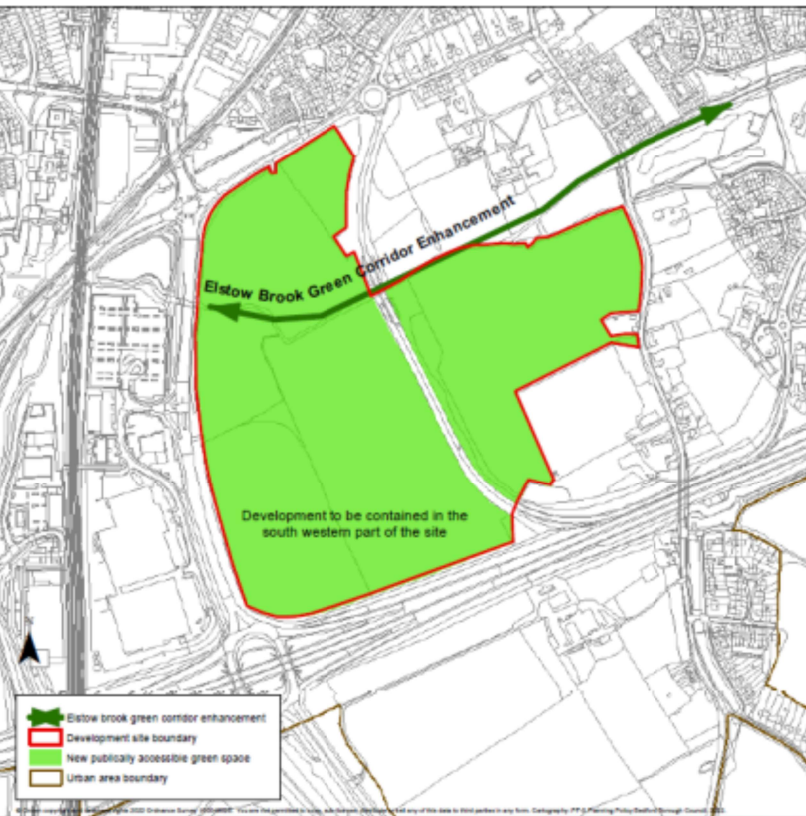
As mentioned earlier within this response, Elstow sits in a very rich local landscape, any development would impact negatively, in particularly in regards of visual impact. For example any current open spaces or green areas in the parish, if development were to be sought then it would have a visual intrusion on either the John Bunyan Trail, Cardington Air Sheds or Elstow Abbey. In addition to this, there is the heritage asset of the Medbury medieval village earthworks.

Much work, effort and volunteer time has gone into improving and strengthening the visual appearance of the village. The manicured grass at the Playing Field, the award winning Abbeyfields Roundabout Group with their colourful floral displays, through to the popular tourist attraction destination of Moot Hall. Growth within a community evolves over many years, it is a concern of the Parish Council that if both these sites were allocated then they would not sit naturally in the village setting.

In recent years, Elstow has seen a significant change in the local landscape in terms of flooding and drainage. Reports of issues with watercourses within Elstow have not only become more noticeably frequent but also more wide spread, these have been reported to and followed up by the Internal Drainage Board as well as the Environment Agency. Also there needs to be consideration the different, but exceptionally characterful parts of Elstow which differ greatly. For example, the area off Wilstead Road, around South Avenue has no street lights, there is a strong sense within that community that if this were to change it would totally alter the setting.

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HOU5 ABBEY FIELD WEST OF ELSTOW



Precedent

A huge concern for the Parish Council, shared by the residents are regarding the issue of precedent if there were to be any allocation of housing on this site. Once a site has been included in an accepted strategic growth document it allows a principle of development being acceptable. At this point it then relies on the local planning process as a site goes forward with a planning application. Having left the inspection process it then falls to BBC as the local planning authority to implement the planning policy set out in the Local Plan 2040, and in reality the site boundary for HOU5 is extensive and could clearly take a much larger development.

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The landowner and their agent have been working together for multiple decades regularly presenting housing proposals in various different parts of the village. The Parish Council will continue to challenge these alongside the HOU5 allocation in order to safeguard the historic and uniqueness of Elstow.

Subsidiary planning policy Document 52 titled 'Changes to the Policies Map' Page 18 shows the HOU5 within the whole parish setting, as illustrated below with the red hatchings. The area within the marked red arrows below is the part of Elstow known as Abbey Fields, this diagram is to highlight the size of Abbeyfields and the size of the HOU5 in that the site could take a significantly higher number of dwellings which has been set out in the Call for Sites supporting documentation supplied by the land owner and their agent. Again, a real concern for the Parish Council and Elstow residents.



Viability

As already mentioned above there is a worry about this site allocation not being restricted to growth of up to 200 dwellings. The Parish Council have seen on multiple occasions in recent years and over time the strategies used within the local planning system in regards to planning gain to enable more houses and therefore more profit from a site. If the precedent is lost with the allocation then there would be further concerns about whether the site is viable with up to 200 houses on. The proposed location of development being restricted to the south west corner of HOU5 means all site infrastructure will be required at the furthest point of the site, therefore costing the most to implement. For example, building a highways access, connecting utilities etc which because of the increased distance to service the south west corner will cost significant more as it is the furthest location from any existing such local infrastructure.

This then enables through the local planning process for viability to be sited as a reason as why the site can not be delivered. More houses therefore being proposed with a the threat to the local authority that they may fall behind with their strategic housing need supply being delivered. This again leaves the site vulnerable over time.

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Infill

Once the site infrastructure has been put in place, it leads to opportunities for this site within the Urban Area Boundary even with the special classification of Elstow being a historic rural village, it is highly likely that the site would in the life time of the Plan grow and the density of housing within the site if it were to grow would again bring a swathe of urbanisation and the risk of Elstow being submerged into Bedford Town.

Isolation

Communities take time to grow, this is a process that evolves over time. Elstow has had first hand experience of how when development comes it can not immediately be integrated into the local village. The proximity of the pocket of houses within the site is a great concern for the Parish Council and again Elstow community as it is effectively distinctly located well away from any exiting housing settlement and the village centre. In order to do anything it will require the inhabitants to have to get in their vehicle(s) to access services or facilities, this therefore does not feel like sustainable growth which is now the understandably favoured direction for growth.

Wildlife and habitat

Loss of wildlife, habitat, the wider ecological network, and valuable landscaping (trees and hedgerows), failing to conserve and enhance the natural environment, as required by the NPPF 2021. It is important to understand that there are protected species on this site such as red kites nesting.

EMP5 LAND AT PEAR TREE FARM, ELSTOW

EMP5 Policy Wording

Types of Employment

Throughout the Local Plan document Bedford Borough Council have draft allocated employment sites with the wording 'a modern research campus-style development, primarily for research and development with elements of manufacturing, warehousing and distribution'. This is a very generic statement for a number of significant areas of land within the borough. By having made such a sweeping statement of uses (ranging from Use Classes B2 and B8 to Use Class E) enables a site to potentially come forward with any one of those or all of those outlined. Such a large site being used for research and development, differs hugely from such a large site being used for warehousing and distribution, including physical and technical requirements and space together with associated demands and consequences.

Planning policy words that are so broad are subjective, in that if it is not concise and clear on what the purpose of the site is, that it becomes unmanageable at masterplanning and outline planning application stages. What may be intended by Planning Policy Officers in reality is then broadly something quite different, and it is the local residents who have to live with that adverse changes and impact for generations to come.

The evidence within the subsidiary planning policy document (Employment Land Study 1 and 2) of there being a need for such a large site not only at EMP5 but also other sites to take 'modern research style development' is weak and imprecise, failing to meet the golden rule, which is that policies should be clear, concise, positive, relevant and capable of being delivered.

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Site History

As local authority Officers know, the site known as Medbury Farm within the parish, was allocated in the Allocations and Designations Local Plan 2013 as a 31ha B1 business park. Elstow Parish Council were throughout the Plan consultation phase strongly in objection to this.

It is understood that despite discussions since allocation, no site-wide masterplan was forthcoming, no planning application was ever made and therefore, thankfully no planning permission was issued for this enormous site. Unsurprisingly, yet still very disappointingly, the site was submitted through the 'Call for Sites' 2020 process as a potential housing site with capacity up to 1400 dwellings. This has always been a great worry that this site would receive an employment allocation, that was clearly never going to be delivered, to then reappear as a site for housing.

Elstow Parish Council wish to make it abundantly clear that this site which has not in the last twenty years been so much even attempted to be progressed must not be considered for any type of allocation, employment or housing. Not just to the over-riding factors listed previously, also contained within this response, but in addition to the fact this site is clearly undeliverable. The Parish Council were concerned as well that the loss of such a large employment site previously allocated would put pressure on the local authority to meet the required deliver of such land in the immediate and near future.

As a result Officers have found themselves needing to allocate an exceptionally high number of employment sites to meet the lack of the former allocation at Medbury Farm coming forward. It is weak, that the site remains in situ again in the draft Local Plan given the poor history of the site. The effectively 'lost' employment allocation from Medbury Farm not being delivered appears to have now resulted in very high numbers of employment sites all being given a generic designation for research use. Surely if the need for such research was rampant in Bedford borough then the Medbury Farm allocation would have been snapped up.

Environment

The sites are best and most versatile (BMV) agricultural land as defined in the NPPF and should be protected from significant, inappropriate or unsustainable development proposals.

Building height

Any structures and associated infrastructure constructed on the proposed sites, particularly large distribution and warehouse units, would have an unacceptable height and scale, be imposing on nearby residential units and prominent within its rural landscape context, particularly given the elevated topography and openness of the land. The proposals would be visually intrusive on the local landscape, harmful to its character and qualities.

There is only some small linear housing settlement on Wilstead Road which would look totally out of keeping with a range of employment buildings, regardless of use.

Transport/Highways

A full study was commissioned by the Borough Council for the current Local Plan 2030 on the effect of proposed additional traffic on the A6 approaching from the North into Bedford. This was the main reason that large developments north of the town have been ruled out. The research carried out by AECOM on the effect of the increase in traffic approaching from the South if these developments were to go ahead is inadequate and does not show the effect of so much more traffic being generated by the proposed developments in Elstow, by the cut-through traffic from

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and to the A600 and the large developments proposed close to the A6 by Central Bedfordshire Borough Council. The build up of traffic approaching the A421 or the new Wixams station would be extreme and no proposals are evident of mitigating road changes.

The biggest cumulative impact that will be seen within the parish will naturally be around highways and further increases in traffic on the already overwhelmed existing busy rural roads which have become very congested at school opening and closing times throughout the rush hour period as the village is used as a 'rat run'. The Parish Council have extensive data from local surveys, Police and local authority survey with the problems experienced particularly along Cotton End Road. Traffic originates from outside the village and is an indication of how development outside of the Parish Council's area has in turn adversely affected the resources within the village.

Technology advances and changes to industry/Pandemic

There have been a number of changes to how the population now work from home, with fundamental changes to the workplace environment. Is additional formal workspace really required when there are already so many vacant office and employment sites in the borough? There also over time been, as there will be also going forwards, the evolution of technology.

Need/demand

Direct competition with the other nearby allocations including the proposed new settlement and related employment provision at Kempston Hardwick.

In November 2020, there were 68,916 sqm of office units and 90,760 sqm of industrial units available in the Borough. Instead of allocating more 'strategic road network' employment sites, the Council should focus on managing and encouraging the development of the 3 already allocated sites, land at Medbury Farm (AD11, land west of B530 (AD17) and Bedford River Valley Park (AD23), totalling 72 ha, where development has not yet started. This would assist in meeting part of the identified additional B-class employment land between 118 and 142 ha.

Whilst the draft allocated site may be in proximity to a junction with the A421, they currently have no direct access to it, nor do they meet the Council's requirement of being in a location with good access to existing or planned rail stations (para 10.22 of the Employment Land Study May 2022).

Para 10.23 of this study clearly identifies two sites:

"Sites at Broadmead and Kempston Hardwick offer an opportunity to provide a location with particular potential for an innovation hub and business / science campus primarily focussed on innovation, research, development and education in conjunction with significant residential growth centred on a proposed new station as part of East-West Rail in the Stewartby / Kempston Hardwick area."

No other new sites are recommended in this study.

The EHH (England's Economic Heartlands, where Bedford is located within) strategy sets out to focus on decarbonisation of the transport system by harnessing innovation and supporting solutions which create green economic opportunities; and promote investment in digital infrastructure as a means of improving connectivity, in order to reduce the need to travel. These proposals contradict this strategy and fail to:

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- *Support the delivery of low carbon transport by working towards reduced congestion, digital connectivity, and a net zero carbon system by 2040/27*
- Promote connectivity and accessibility in new development, and link new and existing communities
- Support opportunities for active travel and green infrastructure
- Promote and support infrastructure development which reflects the ambitions of the three preceding principles.

Sustainability

Anything from electric charging points, solar panels or enhancement of the cycle and pedestrian routes could be included. Brownfield sites should be considered first before proposing development on greenfield sites. Previously developed land in or immediately adjoining the urban area of Bedford should be utilised in the first instance, with the opportunity to adapt against climate change, rather than encroaching into the open countryside.

Light pollution

The site will be lit and therefore dramatically change the local landscape for the residents in this part of Elstow community which currently have no street lighting and welcome the 'dark skies' policy in this rural setting.

Wildlife and habitat

Loss of wildlife, habitat, the wider ecological network, and valuable landscaping (trees and hedgerows), failing to conserve and enhance the natural environment, as required by the NPPF 2021.

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SECTION NINE: MITIGATION MEASURES

The purpose of this section is to outline the Parish Council's comments, having engaged with parishioners, to understand what mitigation measures would in their opinion be needed. The Parish Council would like to reiterate that these comments are being made without prejudice in terms of Policy EMP5 and HOU5 and should not be taken that the Parish Council support the proposed employment allocation but are following feedback from residents:

POLICY HOU5 ABBEY FIELD WEST OF ELSTOW

1. Ensure that Elstow Parish Council takes an active role and is fully engaged and identified as a key stakeholder in the preparation of the Masterplan.
2. Policy amendments to include clear, robust wording within HOU5 that states 'the number of dwellings up to', so the size of growth within this site is restricted.
3. Traffic management must be robust and measured given the ongoing issues Elstow has with speeding, volume of traffic and the use of the village highways network as a 'rat run' with large volumes of congestion stationary for long periods at peak flow times. Along with particular attention to the Elstow Primary entrance located on Abbeyfields Road which has a number of regular highways safety issues well documented.
4. Strong protection, with extensive mitigation measures for the numerous heritage assets as identified within the Elstow Conservation Area Management Plan.
5. Environmental considerations include tree/hedgerow planting; creation of wildlife opportunities.
6. Sensitive lighting that recognises the position of the site being some distance from any other settlement area.
7. Community assets created and enhancements to recreational facilities, local amenities, cycle paths, safe footpaths, safe access to the site.
8. Enhancement of PROW and bridleway networks.

Given that the sites' developments are meant to be in a landscaped setting/environment, a significant proportion of the sites should therefore be identified for meaningful landscaping and enhanced opportunities for biodiversity net gain noticeably beyond the minimum requirements

POLICY EMP5 LAND AT PEAR TREE FARM, ELSTOW

1. Ensure that Elstow Parish Council takes an active role and is fully engaged and identified as a key stakeholder in the preparation of the Masterplan.
2. Policy amendments to include clear, robust wording within Figure 10 to safeguard the settlements in closest proximity to the development.
3. Policy amendment to include clear identification of protection for the site and growth coming of EMP5 from HOU16 located in close proximity to the south of the site.
4. Traffic management must be robust and measured given the ongoing issues Elstow has with speeding, volume of traffic and the use of the village highways network as a 'rat run' with large volumes of congestion stationary for long periods at peak flow times.
5. Environmental considerations include tree/hedgerow planting; creation of wildlife opportunities.
6. Sensitive lighting that recognises the dark sky policy within the southern part of the village.
7. Sensitive operational hours of work recognising the needs of the local community.

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8. Community assets created and enhancements to recreational facilities, local amenities, cycle paths, safe footpaths, safe access to the site.
9. Noise control recognising the needs of local residents.
10. Enhancement of PROW and bridleway networks.

Given that the sites' developments are meant to be in a landscaped setting/environment, a significant proportion of the sites should therefore be identified for meaningful landscaping and enhanced opportunities for biodiversity net gain (beyond the minimum requirement of 10%).

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SECTION TEN: CONCLUSION

Elstow Parish Council recognises that the A421, A6, East West Rail and Midland Mainline railway are travel corridors which would support development along part of their routes south of Bedford but would also point out that the A6, East West Rail and Midland Mainline all go north from Bedford as well, and therefore should attract a fair share of development along this part of their routes. This sharing should include some development in the communities north of Bedford and should not concentrate solely on development along the A421 corridor to the south of Bedford.

Elstow is a relatively small village with a rich history and heritage and local residents are attracted to the village by its proximity to the countryside. This rural character must not be detrimentally affected. Whether it is the threat of being urbanised or the threat of coalescence as Wixams again extends across the fields in the direction of Elstow.

There has been representation within the consultation done in a misleading way to all stakeholders in this consultation process as set out earlier in this document.

With a number of areas where the Parish Council has highlighted HOU5 and EMP5 are against existing planning policy. In addition to raising the weak planning policy wording within the draft local Plan 2040 which will not safeguard and protect the existing local communities.