

Part B – Please use a separate sheet for each representation

Name or organisation: St Neots Town Council

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text" value="no"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="no"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="no"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see attached document.

The strategy of developing Little Barford as a location for potential Bedford Borough Council housing fails three of the four tests under NPPF paragraph 182 Tests of Soundness.

SNTC feels that the inclusion of policy HOU19 within the current proposed Bedfordshire Borough Council Local Plan fails:

the "justified test" (the plan should be the most appropriate strategy, when considered against the reasonable alternatives)

- option 2a is a viable alternative (without the associated impact relating to Little Barford)

the "effective test" (the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities)

- limited if any cross boundary joint working in relation to the risks to St Neots ranging from flood risk to demands on an already stretched infrastructure.

the consistent with national policy test (the plan should enable the delivery of sustainable development in accordance with the policies in the framework)

- fails to meet NPPF chapters:

- (section 13) protecting green belt land
- (section 14) meeting the challenge of climate change and flooding
- (section 15) conserving and enhancing the natural environment
- (section 16) conserving and enhancing the historic environment

The majority of SNTC's concerns remain as vocalised within the earlier St Neots Town Council response document (September 2021) and the related queries remain unanswered.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The plan should use 2a rather than option 2c

(Continue on a separate sheet /expand box if necessary)

Please note. In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

 Yes

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Bedford Borough Council have failed to consider the impact that Little Barford (HOU19) will have on St Neots and for that matter the area around Little Barford. Comments were raised along with questions back in September 2021, these remain unanswered.



St Neots
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St Neots Town Council Representation to the Bedford Borough Local Plan 2040: Plan for Submission (Regulation 19 publication stage)

July 2022

During the earlier stages of the development of this plan, St Neots Town Council requested cross boundary cooperation with Bedford Borough Council to ensure that proposals that directly or indirectly affected the town were adequately investigated to mitigate or minimise the impacts felt on the town and the residents.

St Neots Town Council is concerned that this Local Plan preempts the OxCamArc consultations, and goes against this spirit of "region-wide planning". SNTC are disappointed that no attempt has been made by Bedford Borough Council to engage with St Neots Town Council during the consultation phase for the 2040 plan.

“To realise the full opportunities – and overcome the challenges – will require coordination of planning functions across the region. Local councils cannot do this on their own because of the level of coordination needed across the area, and because they do not have all the levers needed to develop a genuinely integrated plan. Government needs to play a supporting role to bring together a strategic approach at the Arc level to support better planning and ultimately better outcomes for the economy, environment and communities.”

The proposed new settlement of Little Barford makes reference to the proposed upgrade of the Caxton Gibbet to the Black Cat section of the A428 in isolation along with the proposed East West Rail again in isolation. Nowhere are these entities combined to understand how the area and therefore the proposed development would be impacted. If you then exclude areas of the site at risk to flooding the site becomes less attractive.

There still remain too many unknowns relating to HOU19, the majority of these have been left to be written and or developed after the consultation process and therefore too late in our opinion (see comments within policy wording in later section: NPPF Paragraph 182).



NPPF PARAGRAPH 182

The NPPF states that the local plan will be tested by the Planning Inspectorate as follows:

"NPPF paragraph 182 Tests of Soundness

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound", namely that it is:

- ***Positively prepared*** – *the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*
- ***Justified*** – *the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*
- ***Effective*** – *the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and*
- ***Consistent with national policy*** – *the plan should enable the delivery of sustainable development in accordance with the policies in the Framework."*

SNTC feels that the inclusion of policy HOU19 within the current proposed Bedfordshire Borough Council Local Plan fails:

the "justified test" (the plan should be the most appropriate strategy, when considered against the reasonable alternatives)

- option 2a is a viable alternative (without the associated impact relating to Little Barford)

the "effective test" (the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities)

- limited if any cross boundary joint working in relation to the risks to St Neots ranging from flood risk to demands on an already stretched infrastructure.

the consistent with national policy test (the plan should enable the delivery of sustainable development in accordance with the policies in the framework)

- fails to meet NPPF chapters:
 - (section 13) protecting green belt land
 - (section 14) meeting the challenge of climate change and flooding
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The majority of SNTC's concerns remain as vocalised within the earlier St Neots Town Council response document (September 2021) and the related queries remain unanswered.



POLICY WORDING (HOU19)

Little Barford (extracted from proposed local plan)

4.92

*Land at Little Barford is allocated as a new settlement, contributing to the delivery of the Bedford Local Plan's spatial growth strategy. The development of Little Barford will make a key contribution towards the additional homes required to be delivered across the borough by 2040, delivering **at least** 4,000 new homes overall, of which an estimated 3,800 will be within the current plan period.*

SNTC: described as a 'key contribution' but is this 'justified' (NPPF paragraph 182) due to the remote location in relation to Bedfordshire Borough Council as a whole. Option 2a of the earlier consultation documents contains similar numbers of housing but delivered in a more logical form.

St Neots is already straining under the demands of historical growth (the town has grown significantly since the post war period). It is currently undergoing expansion to the East of the town (well outside the influence of the River Great Ouse) a core strategy within Huntingdon District Council's local Plan. Development of the green field site at Little Barford would see additional strain put on St Neots and the infrastructure.

4.93

The new settlement is located to the north east of Bedford, close to the neighbouring town of St Neots. The East Coast Main Line railway line runs north to south through the site and the proposed A428 Black Cat to Caxton Gibbet relief road runs through the site providing an opportunity for a strategic road junction. In addition, EWR will be crossing in the vicinity, possibly through the site, and will include a station offering the opportunity of a highly sustainable site accessible by rail and the strategic road network. In addition to the allocation site there is further land within the same ownership which is identified as a contingency area, should land be required to facilitate the EWR route and / or station within the site. The allocation site and contingency land are illustrated by the plan below.

SNTC: EWR route and planning is not confirmed and therefore policy HOU19 is somewhat premature.

4.94

The proximity of the site to the existing Little Barford employment area to the north offers the opportunity to locate new employment development by way of extension and / or in other areas of the site to benefit the local economy and provide further employment opportunities.

SNTC: Little Barford employment area to the north of the proposed development is landlocked by the river to the west, the county border to the east and St Neots to the north. Therefore new employment development is not possible due to these constraints.

4.95



The site has unique locational strengths and qualities which, if properly realised and guided by appropriate design principles, will enable it to be an exemplar for low carbon living and innovation.

SNTC: Part of the unique locational strengths stem from the fact that this is good quality farming land, sat adjacent to the Great River Ouse and on the flood plain of the same. There are a number of historical assets within the proposed development and the area is used as a local 'recreational asset'.

4.96

The potential to designate a conservation area at Little Barford is being investigated by the Local Planning Authority.

SNTC: Surely this should have been investigated and confirmed prior to submission of the local plan.

Policy HOU19 Little Barford New Settlement

*As identified on the Key Diagram and Policies Map, land at Little Barford is allocated as a new settlement to create a landscape led beautiful, healthy and sociable community located in close proximity to the proposal for a new station on the East West Rail line delivering **at least** 4,000 new homes and in the region of four hectares employment. It will provide all the key services and facilities to address its own needs, including health, education, retail, culture and community components, and will foster a strong local community based approach to the ownership and long-term stewardship of assets.*

SNTC: Zoning of good quality farming land as potential employment (i.e. extending the existing employment zone situated between the railway lines to the east and river to the west) does not sit comfortably with the proposed ethos of "a landscape led beautiful, healthy and sociable community".

The new settlement will have a distinct identity based on a landscape led approach which values and enhances the natural environment and responds directly to its context. The settlement will be developed to a high design quality achieved through a process of master planning and design coding and will incorporate a range of homes, employment, an integrated and multi-purpose green infrastructure network lending context and character to walking neighbourhoods which will enable residents to meet the majority of their day to day needs locally and achieve access to the new East West Rail station by active travel modes. A strategic masterplan and design code is to be prepared by the Council in conjunction with the landowners, stakeholders and local community and adopted as a Supplementary Planning Document.

This document will need to be produced ahead of the submission of any planning application and will demonstrate how the new settlement will deliver the policy principles below and will include:

- *A Natural Capital impact assessment and biodiversity study with appropriate mitigation and enhancements;*
- *A Green Infrastructure strategy;*



- *A transport and movement strategy including infrastructure needs and the relationship to East West Rail;*
- *A phasing strategy to ensure that infrastructure investment is provided in tandem with or ahead of the development it supports;*

SNTC: what infrastructure investment is being proposed

- *An infrastructure delivery plan setting out the timing, funding, and provision of green, social, and physical infrastructure, including schools, community facilities and local centres in tandem with housing development;*
- *Character assessment and master planning;*
- *Design coding;*
- *A strategy for sustainable long-term governance and arrangements for the stewardship of community assets;*
- *A detailed assessment of the mineral resource within the Mineral Safeguarding Area to examine quantity, quality and feasibility of extraction;*
- *A site specific flood risk assessment including identifying opportunities to reduce surface water run-off and flood risk on and off site;*

SNTC: the site is located on the flood plain of the Great River Ouse. Bedfordshire catchment drains into the Cambridgeshire catchment of the Great River Ouse at St Neots just to the north of this site. It is not acceptable that a flood risk assessment would be restricted to the red line of the site but rather should include the potential to increasing the existing risk of fluvial flooding to St Neots.

- *A detailed heritage impact assessment.*

SNTC: see 4.96 above

In order to ensure that the new settlement is brought forward in a high quality, strategic and comprehensive manner, planning permission will only be granted following the adoption of the strategic masterplan and design code. Development must demonstrate how it has been holistically planned to accord with the objectives of the Local plan and the specific principles below:

GREENER

- The provision of high quality planning, design and place-making, and management of built and public realm so that the Little Barford new settlement is characterised as a distinctive place that capitalises on local assets and establishes environments that promote health, and wellbeing;*
- The provision of a multifunctional green infrastructure which: retains, enhances, connects, and increases accessibility to the green infrastructure network including the River Great Ouse and on site woodland areas; provides well-integrated green space (formal, natural and allotments); and provides environmental net gains;*

SNTC: the existing area is high quality countryside with existing access and rights of way. The proposals do not retain and enhance these

- As part of the green infrastructure network, cycle and pedestrian links to facilitate active travel within the neighbourhoods and surrounding areas*



iv. Integration of Sustainable Drainage Systems into the network of open spaces, to mitigate potential flood risk, and measures to ensure resilience to climate change including measures to ensure the efficient use of energy and water in accordance with Policy 93;

SNTC: flood risk cannot be looked at in isolation as a site risk, but required to be integrated with the broader area.

v. The Council will consider whether any areas of the Little Barford settlement merit designation as a Conservation Area. In the event of its designation, development must preserve and where opportunities arise, enhance its special interest.

vi. The protection and / or enhancement of heritage and biodiversity assets within and surrounding the site, to include:

- *Any new development should contribute positively to local character and distinctiveness and enhance or better reveal the significance of any designated heritage assets affected,*
- *Pre-determination archaeological evaluation in all areas which will potentially be impacted by development and where the nature and significance of the archaeological resource does not necessitate preservation in situ,*
- *Development should also seek to sympathetically reuse built heritage and retain those non-designated heritage assets of archaeological interest in situ, including above ground settlement and associated earthworks, which make a positive contribution to the appearance, understanding, appreciation and interpretation of the historic settlement,*
- *Submission of a biodiversity report with appropriate mitigation and enhancements.*

SNTC: development of this site would be detrimental to both heritage and biodiversity within the site.

PLACEMAKING

vii. Place making based on a landscape led approach to creating a vibrant place which is sensitive to local character and creates distinctive neighbourhoods;

viii. The provision of a range of house types and tenures in accordance with the most up to date assessment of housing need, including affordable housing in accordance with required levels as set out in Policy DM1(S) to meet the needs of the wider community including the ageing population;

ix. The provision of a mix of beautifully and imaginatively designed homes at a range of densities reflecting the context and character of different parts of the site, in particular lower densities in accordance with the historic character of the western side of the site and higher densities in areas with higher accessibility to the East West Rail station and local centres;

x. The provision for a wide range of construction opportunities, offering prospects for a variety of house builders and developers including small and medium sized



- enterprises and including the provision of serviced plots for self-build and custom homebuilding in accordance with Policy DM5;*
- xi. The provision of serviced sites for secondary and primary schools including early years facilitates at the heart of the local neighbourhoods to serve the new development, (2 x 5.5ha 4FE primary and 1 x 10.1ha 8FE secondary schools); Due to the lack of capacity in existing schools, additional capacity will be required to be open prior to the occupation of the first dwelling. Financial contribution towards secondary school provision;*
- xii. The provision of pitches for Gypsy and Travellers and plots for travelling show people where need is identified in a Gypsy and Traveller Accommodation Assessment;*
- xiii. The provision of leisure and sports facilities at accessible locations in line with current standards to serve the settlement;*
- xiv. The provision of multi-functional community space and healthcare facilities within local centres at the heart of walkable vibrant sociable neighbourhoods;*
- xv. The fostering of healthy living through access to green space as a key driver of the settlement design and opportunities for local food production;*
- xvi. The establishment at an early stage in the development of the new settlement of appropriate and sustainable long-term governance and stewardship arrangements for community assets including green space, public realm areas and community and other relevant facilities. Such arrangements are to be funded by the development and include community representation to ensure residents have a stake in the long-term development, stewardship and management of their community;*
- xvii. Layout and design of the new settlement should incorporate appropriate mitigation measures in relation to high pressure gas pipelines, overhead power lines and noise sources including railway lines.*

ACCESSIBLE

- xviii. In accordance with the transport and movement strategy, the provision of a balanced package of measures to encourage smarter transport choices to meet the needs of the new development including the integration of technology to deliver 'on-demand' travel information and measures to reduce the number of single occupancy car trips;*
- xix. Measures should maximise the opportunities for active travel through the provision of a network of footpaths, cycle ways and bridleways to enhance permeability within the site and to the adjoining area and will include:*
- connections between communities across the East Coast Main Line at a minimum of two locations,*
 - new footway and cycle routes including the integration of National Cycle Network (NCN) route 12 through the site*
 - links to the East West Rail station including the provision of a dedicated shuttle bus service from the site,*
 - measures to facilitate access by bus services across the site,*



- *provision of charging points for electric vehicles,*
- *car clubs and mobility hubs,*
- *appropriate measures to facilitate autonomous vehicles,*

SNTC: no details of integration into the existing infrastructure of St Neots nor the issues relating to the existing A428 running west east to the north of the site, potentially limiting integration with existing routes.

xx. A programme of measures to facilitate accessibility and minimise and mitigate the traffic impacts on the local and strategic road network to include:

- *widening of Barford Road and any necessary new junctions,*
- *widening of the existing footway and conversion to a cycle / pedestrian route on Barford Road up to the A428 roundabout,*
- *provision of a multi-user route alongside River Great Ouse and potential to cross the river,*
- *The development is dependent on the delivery of transport improvements which will need to be secured before development can take place in accordance with an agreed Infrastructure Delivery Plan.*

SNTC: major transport improvements are still in planning stages and are yet to be confirmed, again it seems premature to be implementing a local plan policy for Little Barford prior to understanding the impact of these on the potential development.

PROSPEROUS

xxi. The delivery of new neighbourhoods that are sociable, vibrant, and walkable (20 minutes) neighbourhoods with equality of access for all. The new settlement will provide a range of community services and facilities including health, education, retail, culture, community meeting spaces, multifunctional open space and sports and leisure facilities;

xxii. Approximately 3.6 ha of industrial and warehousing employment land, to be located adjacent to and act as an expansion of the existing Little Barford employment area;

SNTC: clause xxii. is in direct conflict with earlier statements of "a landscape led beautiful, healthy and sociable community"

xxiii. Installation of super-fast broadband for all businesses and community facilities and also for all dwellings to support home working, at the outset of each phase of development.



SNTC response to Bedfordshire Borough Council Local Plan 2040

Draft Plan: Strategy options and draft policies consultation 2021



St Neots Town Council Response to Bedford Borough Council's 2040 Plan

The plan is predominantly inward-looking and does not adequately address cross border planning issues. Settlements of the scale proposed at Wyboston and Little Barford cannot exist in isolation. These settlements will be located only a kilometre from the St Neots border and about 3km from the town centre. For comparison, they will be over 10km from the Bedford Town Border. Despite this the proposed Bedford Borough Local Plan 2040 makes no mention of St Neots, neither has Bedford Borough Council made any effort to engage with the Town Council or our residents.

The projections for the Wyboston development in this plan also appears to significantly underestimate the eventual size of the settlements. While the plan states that Wyboston development has a size of 2500 homes, the same site is openly [being marketed by Taylor Wimpey as "Dennybrook Garden Village"](#) with an eventual size of 10800 homes.

[Central Bedfordshire Council's Draft Local Plan also includes a 7000 home development in Tempsford](#) in addition to the new Wyboston and Little Barford settlements proposed here.

It is the view of St Neots Town Council that building up to 20,000 new homes this close will have a far-reaching impact on St Neots residents and services but without the economic benefits such as community infrastructure levy and council tax receipts.

This planning process also seems premature regarding the considerable uncertainty due to the ongoing OxCamArc Spatial Framework and East-West Rail consultations. Given that one of the high-level objectives of the OxCamArc is:

"To realise the full opportunities – and overcome the challenges – will require coordination of planning functions across the region. Local councils cannot do this on their own because of the level of coordination needed across the area, and because they do not have all the levers needed to develop a genuinely integrated plan. Government needs to play a supporting role to bring together a strategic approach at the Arc level to support better planning and ultimately better outcomes for the economy, environment and communities."

St Neots Town Council is concerned that this Local Plan pre-empts those consultations, and goes against this spirit of region-wide planning. We are disappointed that no attempt has



been made from Bedford Borough Council to engage with St Neots Town Council during the consultation phase for the 2040 plan.

In addition to a written response to the points raised here, St Neots Town Council requests that a presentation is made to councillors to further discuss the points raised here and what mitigations will be introduced to both reduce impact and realise the benefit to St Neots.

Summary of points raised:

- There is no reference to the additional services which will be provided to support the new population, assurances that it will be sufficient, or guarantees that it will be delivered.
- Projections of the impact on emergency services are not provided, projections of crime levels in the Eatons and across St Neots, and the planned policing enhancements required to meet that risk.
- Projections of the impact on the London rail link from St Neots station which is already overcrowded and causes significant problems with commuter parking on Loves Farm.
- Assumptions are made around the potential road and rail links being considered, without commentary on mitigations if those plans change
- There is no consideration to the St Neots economy or view on how the settlement will be beneficial to local businesses.
- There is also no reference to any specific steps being taken in housing planning to address the climate emergency.
- The flood risk is also not addressed, the impact of replacing green fields with concrete and tarmac and how the increased flood risk to St Neots will be mitigated.
- The area currently used by St Neots residents for dog walking, running, cycling and other recreational activity will be lost.

IMPACT ON ST. NEOTS SERVICES

Our most significant concern relates to the impact of the proposed Wyboston, Little Barford (and Tempsford) developments, the residents of which are likely to rely heavily on services



provided for St Neots, Huntingdonshire and Cambridgeshire taxpayers, without contributing financially to their provision. It seems unlikely that the needs of these new residents will be completely met by the developers of these settlements.

St Neots Town Council is concerned that the town's schools, doctors, care facilities, recycling facilities etc will feel the effects of the new population by virtue of the fact that the town is closer than Bedford.

– Please provide details of the local facilities and assurance from Bedford Borough Council that all planned facilities will be delivered.

St Neots Town Council also requests that projections of the impacts on emergency services are also provided, in particular, community policing. St Neots local policing has been defunded and reduced over many years and is not in a position to effectively manage undesirable elements which will inevitably arrive with such an expansion in population. County Lines operations show that crime does not stay within the local area and so it's a realistic prospect that if not properly managed in Bedfordshire that St Neots residents will feel the effects.

– Please provide emergency service impact projections, including additional detail on projected crime levels and mitigation.

ROAD AND RAIL LINKS

We acknowledge that there is an opportunity for the Wyboston development to address the long-standing issue of HGVs coming through the Eatons from Staughton Airfield, which have posed a danger to St Neots residents for many years. It is expected that the new development will give an alternative route for these lorries to take, the present objections to weight limits on Bushmead Road will be removed and the way clear for Bedford Council to take the right action.

– Please can Bedford Council confirm that this will be the case and that the long-requested weight restrictions on Bushmead Road can be implemented.

Another long-standing issue for residents of the Eatons is the lack of pedestrian access to the industrial estates near the A1/A428 roundabout. Given that this is likely to be a key employment area for residents of the Wyboston and Little Barford developments, serious consideration needs to be given to access to employment in St Neots. It is not in line with the Town Council's declaration of a climate emergency (2019) to assume that anyone employed



in this area will drive, the plan needs to include pedestrian and cyclist access to this area.

– Please provide assurance and plans to meet pedestrian requirements crossing the A1/A428 roundabout.

The most important topics under review at the moment are East-West Rail (EWR) and the A428 upgrade. The 2040 Local Plan document is unclear on:

– how either of these major infrastructure projects works with the development, especially considering uncertainty about the EWR route selection.

– what dialogue is being had between the three programs or the impact of potential changes to (or cancellation of) either transport link.

– How access from the new development to the existing St Neots station, or the potential new St Neots South station will be managed in terms of projected volumes of commuters and the handling of the additional transport burden.

– Please address all three of these points in full.

ST. NEOTS ECONOMY

It is the view of the council that it is essential that any new development brings benefit to the town and supports the growth of the local economy. Central Government and Huntingdonshire District Council are investing heavily in the high street in the coming years making the town a cultural, retail and hospitality destination in the region.

Section 5 of the plan describes the hierarchy of town centres in the area in some depth but fails to acknowledge the significant presence of St Neots Town Centre - which is significantly larger than that of any of the settlements listed with the sole exception of Bedford.

– Please provide projections of the impact and benefit to the St Neots High Street and local businesses.

CARBON NEUTRALITY

St Neots Town Council declared a climate emergency in 2019 and through various initiatives under the banner of Neot Zero, is striving to help local businesses and residents cut their



carbon emissions by 2030.

While the proposed Wyboston and Little Barford developments do not fall under our jurisdiction, it is not in keeping with the spirit of the town's objectives that new developments are built so close without reasonable facilities to ensure that all the new homes are able to be run carbon neutral.

– Please provide full details of all housing specifications that support carbon neutrality and evidence that the development will aspire in its entirety to be maintained carbon neutral or carbon negative.

FLOODING

In 2020 St Neots suffered three significant flooding events with a considerable loss of property to many residents. There is a concern that replacing farmland with hard surfaces would risk surges into the River Great Ouse and increase the flooding risk to St Neots. Locally Loves Farm and Wintringham have both been built with this in mind using balancing ponds and other measures to offset the risk, the council would like to understand more about the flooding risks identified, the potential impact to St Neots and the mitigations in place.

– Please provide a full environmental risk assessment covering St Neots.

LOSS OF RECREATION SPACE

The most noticeable immediate impact on St Neots residents will be the destruction of large swathes of the natural area which is presently enjoyed by dog walkers, runners and cyclists all year round. The public rights of way will no longer provide what our residents currently have access to, although the 2040 plan describes the importance of health and wellbeing from outdoor exercise it seems to be taking a popular facility away from those who use it today for precisely that purpose.

Presented above are the initial thoughts of the Town Council in relation to what is clearly an early document, however, we trust that the views of the council will be taken into consideration. We look forward to both your responses to our comments and being part of future consultation on the project.

Submitted under delegated powers on 3 September 2021

Sketch Plan of HOU19 overlaid with A428 upgrade and EWR data



uloe

Eaton Ford

St Neots

Eaton Socon

Eynesbury

BBC BOUNDARY

Little Barford

SITE

Wyboston

Eynesbury

EWR ROUTES

A428 UPGRADE