

Part B – Please use a separate sheet for each representation

Name or organisation: *CONSERVATIVES GROUP*

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

No

4.(2) Sound

Yes

No

4 (3) Complies with the Duty to co-operate

Yes

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

(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.

PLEASE SEE ATTACHED

(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, 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:

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

BEDFORD LOCAL PLAN 2040

RESPONSE OF CONSERVATIVE GROUP OF BOROUGH COUNCILLORS

Introduction:

1. As we said in our response to the Draft Plan: Strategy Options and Draft Policies consultation we believe that the consultation process referred to in Para 1.4 of the Introduction to the Draft Plan was fundamentally flawed by the absence of the full range of options from the only document, the "Development Strategy Topic Paper", that would have been seen by the majority of residents.
2. We have previously commented on the absurdity of not permitting the Council to delay the preparation of this plan until the long promised but still delayed Spatial Framework for the Oxford-Cambridge Arc has been published. We remain of that view and do not share the Council's apparent confidence (1.16) that the implications for economic growth and strategic housing will be unaffected should the Framework ever emerge.
3. We are equally sceptical about the significant dependence of the plan on the eventual completion of the proposed EWR route to Cambridge (1.23 – 1.28). At the time of writing the future of this part of EWR looks at best uncertain yet several irreversible fundamental aspects of the plan are predicated on the existence of the railway.

Vision and Objectives:

4. The aspirations as set are laudable but not always matched by the specific policy decisions set out subsequently. In particular, as we said in our response to the Draft Plan, the proposals crucially fail the test of sustainability and the requirements of Policy D1(S) for reasons which are set out below, and the Plan is unsound for that reason alone.
5. The Council's own Sustainability Appraisal clearly states that urban growth is the most sustainable on virtually all criteria yet this Plan, despite that, is a lost opportunity.
6. We believe that properly planned urban expansion, including some areas on high density housing but inevitably entailing some expansion would not only be more sustainable but more closely meet the needs of the main growth sectors as noted in the Local Housing Needs Assessment. The failure to follow up that initial option (and to put it forward for consideration at the draft stage) means that again we are presented with a plan which will lead to sprawling development, merging of communities and landscape degradation with the resulting loss of amenity for all residents.

Spatial Strategy and Site Allocations:

Transport Strategy

7. We support the objectives of the Transport Strategy although as stated do not agree with its dependence on EWR. However, there is no reference to the need for a comprehensive network of safe cycle routes. There has been some unstructured and piecemeal efforts made by the Council but nothing that meets the existing need or will encourage more people to use cycling as an option to car travel.
8. Similarly the reliance on current rural locations for over 10,000 of the proposed new dwellings also does nothing to encourage a reduced dependence on the car.

Housing Sites

9. We have a number of specific concerns about some of the proposed sites as set out immediately below:

Gibraltar Corner: this proposed development is opposed by virtually all local residents who have had an additional 1200 home and almost continuous warehousing developments. The addition of a further 500 houses will finally destroy the rural nature of Kempston Rural Parish. This proposal will mean a loss of yet more agricultural land, destroying the character of the area and will mean that there is a continuous sprawl of housing and warehousing from Kempston Town to Wootton contrary to the Council's own policies on coalescence and the NPPF s174.

Wixams East: this will similarly result in the effective merger of two distinct communities, Wixams and Wilstead, and lead to a what is in effect a continuous area of development from Stewartby, Wootton, through Kempston Hardwick and Wixams to Wilstead, Elstow and Shortstown. It will be an uncoordinated and unstructured urban sprawl with no oval coherence, grossly inadequate infrastructure and again will be dependent on car use.

Shortstown: The 1500 houses on College Farm allied to the 250 houses on the DVSA site at Shortstown also raises the issue of the inadequate infrastructure including the problems of the A600, school provision and health provision. It will again lead to a sprawling development, dependent on car use, that will link Shortstown and Old Harrowden and with implications for Cotton End.

Employment Site: EMP6 Business Park: While this site has the advantage of access to the A421 its impact on the landscape will be disproportionate. The site is relatively elevated and will lead to effective coalescence with the proposed new development of 500 in what is to be called Great Barford West. This will have a disproportionate impact on both Water End and Green End, Renhold and lead effectively to continuous development from Great Barford to Bedford.

Town Centres:

- 10.** We support the aspirations for the town centres but believe that the unambitious and passive proposals listed remain as aspirations only rather than constituting robust policies.

We suggest that this section falls well short of the requirements set by the NPPF s86 in particular with reference to adaptation and residential development.