

Bedford Borough proposed Local Plan 2040

Wilstead Parish Council's submission to the Hearing session on

Matter 5 – Spatial Strategy and Distribution of Growth.

Wilstead Parish Council continues to object strongly to the proposals for development contained within the proposed Local Plan 2040 for Bedford Borough.

Note: To avoid any confusion this submission uses the more commonly used village name of Wilstead. The parish name of Wilshamstead is used for the Neighbourhood Plan to ensure that any future development within the full Parish boundary is addressed. For this submission we use the name Wilstead as this aligns with that used in the Local Plan.

The Parish Council's objections fall into the following categories:

1. Uncertainty over Government requirements.
2. The process for determining the location of new development South of Bedford (including the Settlement Hierarchy process) is flawed. In this Section the Council addresses the relevant questions from the Inspector's Matters, Issues and Questions document particularly with regard to:
 - The number of new houses proposed would overwhelm the quiet rural community of Wilstead and result in coalescence of separate historic villages with insufficient definition of strategic gaps between them. (See map at Appendix)
 - The Plan does not address the provision of sufficient infrastructure to support the volume of new houses proposed.

A second submission covering Matter 8 'South of Bedford Area Housing and Employment' which is planned to be addressed at the Examination on 11th & 12th September will be submitted prior to the stated deadline of 12th August.

1. Uncertainty over Government requirements.

Now is not the right time for a new Local Plan, especially as Bedford now has a new Mayor, elected on 4th May 2023, who may have different ideas on the future of the Borough.

The proposed Plan is based upon the Government's Standard Method for calculating housing need which results in a figure of 27,100 additional houses over the period of the Plan.

- a. The Secretary of State for Levelling Up issued a letter to MPs in December 2022 stating that national planning targets should be seen as 'advisory' rather than mandatory and that it should be up to Local Councils to determine the number to be built. It is unclear from the draft Plan how there is a real need for 27,100 additional houses.
- b. The Levelling Up & Regeneration Bill is currently going through Parliament. After a number of amendments by MPs, it is expected to change planning policy in a number of areas, but three in particular are significant:
 - To confirm the abolition of national targets
 - To remove the requirement on Local Authorities for a 5 year land supply
 - To establish the principle of "Infrastructure First"
- c. The Government is currently undertaking a consultation on a revised National Planning Policy Framework (NPPF)

As a result of the ongoing process of change in this area, according to The Times on 7th April 2023, 55 Local Authorities have suspended their development plans.

Bedford Borough Council should suspend the Local Plan 2040 as it is not yet clear whether it is consistent with the latest national policy.

2. The process for determining the location of new development South of Bedford (including the Settlement Hierarchy process) is flawed.

Wilstead Parish Council has considered the questions raised by the Inspector under matter 5 and has the following comments.

Question 1 – are the four themes of the Plan appropriate?

Theme 1 - Greener

- the Plan will not create an inclusive local community in Wilstead Parish.
- It is not clear how it will minimise the effects of flooding.

Theme 2 – More Accessible

- The Plan will result in very much increased congestion in the area.
- The Plan relies upon easy access to an East West Rail line. The creation of this line is by no means agreed. It is too early to be basing development size and location on this proposal.

Theme 3 – More Prosperous

- The Plan does not deliver jobs in the Wilstead area.
- There is no provision for healthcare.
- There is no answer to poor transport links.

Theme 4 – Better Places

- The government requirement is questionable .
- Does not utilise previously developed land but intrudes upon valuable agricultural resource.
- Does not introduce high quality healthcare.

Question 3 – How was the Spatial Strategy arrived at?

- a. There were no additional houses allocated to Wilstead in the 2030 Local Plan. How can there now be justification for 2,300? This is in direct contradiction to the Wilstead Neighbourhood Plan which contains no development owing to the proximity of development in adjoining communities and the clearly demonstrated wish of parish residents to live in a rural community.
- b. There are clear arguments to suggest that traffic congestion in the area will be greatly increased (highlighted in the AECOM produced “Infrastructure Deliver Plan” ref para 4.3.43).
- c. National Highways made the following very valid point when responding to the draft Local Plan:

“The proposals are largely predicated on the delivery of East-West Rail (EWR) to provide sustainable connections. At this stage EWR is at a development stage, prior to the statutory process that would lead to a Development Consent Order. Thus, whilst government has indicated strong support of its provision, at this time there is risk with its delivery and implementation.”

This concern throws the whole plan for the South of Bedford into doubt and is another reason why a decision on the Plan's proposals should be suspended until more information is available.

There is no evidence of consultation with other local authorities. For example in their response to the consultation on the proposed Plan developers O & H have commented "Consideration should be given to the impact of this allocation on the local landscape as well as the functional relationship with planned development in Central Bedfordshire Council. Wixams is a cross-boundary new settlement and it should be shown in its entirety on Figure 8. This small change would allow all parties to assess the impact of further growth at Wixams." Wilstead Parish Council has put together a map of proposed development (including that already agreed) which shows the Parish would be surrounded by housing, (see Appendix). Within the parish itself the number of houses would treble. Wilstead is proposed to sit in an arc of Key Service Centres / major developments south of the A421 stretching from Kempston Hardwick to Shortstown.

This would be the first and dominant view of this area as you pass over the Greensand Ridge travelling north towards Bedford along the A6, A600 and B5131. An area that was previously a green landscape will appear as an urban adjunct to the town of Bedford.

- d. The Local Plan 2040 Key Diagram on page 83 shows Wilstead as a Key Service Centre without any 'Strategic Allocation' or any 'Strategic Housing Commitment'. There is an assumption within the proposed Plan that Wixams can take further growth without problem. Hence Policies HOU15 and HOU16 refer to land "South of Wixams" (HOU15) and land "East of Wixams" (HOU16). Both of these proposals lie solely within the Parish of Wilstead, yet Wilstead is not mentioned. The Parish Council is concerned that this is an attempt to hide the effect on the village and avoid the obvious contradiction to the Wilstead Neighbourhood Plan outlined above.
- e. Development in the Wixams area is clearly the main basis for achieving the target of new housing proposed – witnessed by the fact that the name occurs 33 times throughout the draft Plan. Wilstead appears 7 times and in each case is not associated with any development. Yet Wixams lies largely within the boundary previously prescribed for Wilstead and was only created as a separate Parish when the number of houses in Wixams grew to be incompatible with the historic small village of Wilstead. Wilstead has conceded enough development in the past and should now be left with a substantial green buffer to maintain its countryside location and local community.
- f. See the arguments against the Settlement Hierarchy process used to designate Wilstead as a Key Service Centre in the response to Question 17 below.

Question 4 – How does the chosen spatial strategy relate to or differ from the strategy in the Local Plan 2030? Can the two co-exist?

There is no allocation of housing to Wilstead Parish in the Local Plan 2030 after over 200 people objected to the imposition of 500 new houses in the original 2030 proposal. The proposal in the draft Plan 2040 for 2,100 homes in the Parish is completely contrary to what was agreed then and takes no account of the objections raised to the proposed 2040 Plan. The responses to the Local Plan 2040 draft have been collated in one document by the Council. In this document Wilstead is mentioned no less than 953 times. This shows the strength of feeling against the proposal for development within the Wilstead Parish boundary.

Question 5 – Does the chosen spatial strategy promote effective use of land,? Has the loss of agricultural land been adequately considered?

None of the development for Wilstead would occur on brownfield land. Wixams was originally agreed partly because it made use of such land but these proposals would mean the loss of pure agricultural land and views to the countryside from existing rights of way.

Question 6 - How have decisions relating to the principle and general location of new settlements been considered? Is the approach justified?

The approach taken for Wilstead is not justified. The village will be overburdened. As an example it already suffers from a doubling of through traffic as a result of the expansion of Wixams and the need for commuters to travel east. Cotton End Road in Wilstead is the only east-west route in the vicinity and offers an alternative to the congested A6 junction at Clophill.

Question 7 - How have strategic infrastructure improvements influenced the chosen spatial strategy? What are the main strategic infrastructure dependencies? What assumptions have been made about the timing and delivery of each strategic infrastructure dependency?

The Infrastructure Delivery Plan upon which the Proposed Plan is based does not adequately address the need to support such a large community. Experience of the promises made before the development of Wixams shows that, 15 years later, the area is still lacking resources that were promised originally e.g. train station, health centre, large supermarket, adequate schools. The developments proposed for Wilstead would only add to the demand for resources which still do not exist. See also the comments made under Question 14 below.

Question 10 - How have impacts beyond the Borough boundary been considered and reflected in the choice of spatial strategy?

As indicated under the response to Question 3, paragraph c, there is no evidence of consultation with other local authorities. There is a huge coalescence of development proposed around Wilstead (see Map attached as an Appendix to this hearing statement.).

Another example would be consideration of the capacity of the A6 trunk road for the additional traffic heading South for Bedford Borough.

Question 11 - Have the specific sites allocated for development in the plan been appraised and selected, including in comparison to alternatives, using a robust and objective process? Has the Council taken an appropriate approach to identifying the capacity of sites?

As indicated above the process of selection for land South of Bedford is flawed for the many reasons listed.

Question 13 - How has flood risk influenced the choice of spatial strategy? Is the approach to assessing risk robust and consistent with national policy?

Policy HOU 16 proposes the build of houses in the one area of the greatest risk of flooding in Wilstead Parish. The fact that the proposed development is split so that water may run between the two halves does not take away from the fact that drainage of water from the split sections of the development would no longer be absorbed by agricultural land and would be channelled into existing ditches, thus increasing the risk of flooding in other areas of Wilstead that have not previously experienced it.

Question 14 - How has the availability of key public services influenced the spatial strategy, including emergency services, wider medical, and schooling?

Wilstead has a very successful Primary School which attract many residents from Wixams who prefer its friendly atmosphere and past educational successes. This school would be overwhelmed by

applications from the large number of additional residents proposed and has little room for expansion. Longer term, any additional schools built would, with their newer facilities, then threaten the viability of the existing school.

The lack of an adequate bus service to and from Wilstead is referred to below.

There has been a medical facility promised (including initial S106 funding which has since expired) since the very first days of Wixams development. No-one from the Borough has been able to tie this down and the lack of medical facilities is still one of the most contentious subjects for new Wixams residents. The latest situation is that the NHS is refusing to fund the £190k per annum needed to run a facility even though a new location has been discussed. The addition of a further 2,100 homes in Wilstead would exacerbate the problem even further.

The location of proposed development away from the centre of Wilstead, although still within its Parish, would create separate communities and detract from the integrated, friendly and crime-free village that exists today.

Question 17 - Is the settlement hierarchy, and reasoning relating to choices and boundaries, clear and well founded?

Wilstead Parish Council has consistently challenged Wilstead being designated as a Key Service Centre which implies it is able to sustain greater development than other villages in the Borough:

- Due to recent expansion, Wixams, Wootton, and Shortstown are also designated as Key Service Centres. To include Wilstead as a KSC is to create a string of four KSCs in one broad area, effectively creating a coalescence of urban environment where once it was attractive countryside. This also contradicts former Borough policy which ensured that KSCs would not be located together. At its narrowest point Wilstead would be only 800 metres from Wixams, **nothing like the size of Strategic Gap that would emphasise the inherent difference between the two communities.**
- Employment opportunity is a key factor which is not evaluated.
- The scoring system within the Settlement Hierarchy is flawed in that it puts undue emphasis on the availability of one general store/post office.
- The village no longer has a doctor's surgery.
- The re-routing of the no 81 main bus service through the village has made the service very erratic and a large number of residents live over half a mile from the nearest bus stop.
- The local church has lost its vicar and vicarage meaning there will be limited local service in future.

Question 19 - Overall, is the spatial strategy sound, having regard to the Borough's assessed development needs and the requirements of national policy?

Refer to the comments responding to Question 3 above.

Conclusion

Bedford Borough Council appears to be pursuing the adoption of a new Local Plan despite the opposition from local communities and when there is currently no Government pressure to do so. The targets are unclear and the Government strategies regarding the Oxford/Cambridge Arc and East West Rail are not clearly determined. The proposed Plan should be suspended for the present.

Appendix

