

**BEDFORD BOROUGH LOCAL PLAN 2040**  
**DRAFT PLAN: STRATEGY OPTIONS AND DRAFT POLICIES**  
**RESPONSE from WILSHAMSTEAD PARISH COUNCIL**

**OVERVIEW**

This document represents the considered response of Wilshamstead Parish Council to the strategic proposals set out by Bedford Borough Council in their consultation conducted June to September 2021.

**Parish Council Approach to the Consultation**

Wilshamstead 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 even at this consultation stage, to ensure that Wilshamstead 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 in ensuring they are not only aware of the proposals and their direct impact on Wilstead, but also in engaging effectively in the consultation process.

The Parish Council also feels at this stage of drafting such a significant development strategy document, that it is important to reiterate items that have previously been expressed.

Wilshamstead Parish Council, as usual, has been extremely pro-active in attending Bedford Borough Council led consultation events directed at local parishes, as well as the various public engagement activities within the consultation run by Bedford Borough Council. 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 has become apparent during this consultation, given that the local authority is looking at so many different strategic options, in addition to a huge number of important accompanying planning policy documents which will shape the future of Wilstead and communities across the Borough.

The Parish Council has facilitated a number of different ways to encourage Wilstead residents to engage with this consultation process, whether directly to Bedford Borough Council representatives or through feedback to Wilshamstead Parish Councillors. Throughout this consultation it has remained an absolute priority that all in Wilstead are aware of the enormity of the proposals, and that they can have their say and their voice heard. This has included using a village electronic circulation list, website publications and social media posts. This is in addition to multiple communications made to the village population through the village magazine along with residents being welcomed to the July Parish Council meeting. The Parish Council also arranged a specific drop-in session on Wednesday 18<sup>th</sup> August at Wilstead Village Hall to enable residents who had questions and/or required assistance with understanding to engage in responding to the consultation. The Parish Council is very grateful to members of the Borough Planning Department who assisted in providing help and information for this session.

Consultation on the above challenges has been difficult due to anxiety, related to the changing Covid restrictions, and in addition due to the volume of documents being consulted on.

As a result, it was important to Wilshamstead Parish Council that they focus on Wilstead - the area known best to Councillors. Local communities around the Borough area will be better equipped to represent the area(s) they serve.

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**RESPONSE SUMMARY**

The Council has developed arguments in each of the following categories. These arguments are expanded upon later in this document under the requisite headings.

**1. Location of future development in the Borough**

After extensive review and consultation within the village, the Parish Council agree with the selection of Option 2 within the Strategy Options put forward.

A preferred option is identified later in this document together with a ranking of other identified strategies.

**2. Potential adverse effect of major development in Wilshamstead Parish**

There have been many concerns raised about the possibility of the Plan generating a large number of additional houses in Wilstead, 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.

**3. Settlement Hierarchy**

The Parish Council recognises that some development may be unavoidable but would wish this to be restricted to that suited to a Rural Service Centre and to be consulted on any location. Assumptions made in the Bedford Borough draft Settlement Hierarchy may be based on inaccurate data.

**4. Coalescence**

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

**5. Capacity of Existing Resources**

Any further development threatens the ability of existing resources to cope as these are often inadequate for existing residents.

**6. Neighbourhood Plan**

The village has been preparing a Neighbourhood Plan since February 2017 and has had problems with support for the process during the Covid pandemic. Consequently it would not wish the Local Plan to pre-empt the important proposals already in draft form which include the allocation of Important Green Space designation to many of the sites identified under the "Call for Sites" process.

**7. Conclusion**

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

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**SECTION 1: LOCATION OF FUTURE DEVELOPMENT IN THE BOROUGH**

The Parish Council makes the following comments on Bedford Borough Council's preferred Option 2 (all sections) and then addresses the other options contained in the Plan consultation.

These comments are made against the reported requirement of 12,500 dwellings in the Local Plan and the Council would wish to be given the opportunity to amend these comments if this quantity is adjusted in the future.

Specifically, The Parish Council was surprised to read in the CPRE's Bedfordshire Briefing Document that the planned allocation by Bedford Borough Council is larger, and in most cases much larger, than surrounding Local Authorities. The Parish Council seek confirmation that all these Local Authorities are using the same Government data in order to derive their particular housing needs. In light of the CPRE Bedfordshire data comparisons, the Parish Council feel it is reasonable for the Borough Council to explain why Bedford Borough's strategic growth is so much higher. This is important for not only Parish Councillors, but equally valuable when responding to queries from residents regarding the perceived Borough housing need and its allocation.

**Option 2.**

***2a. Development in and around the Urban Area, plus A421 transport corridor with rail-based growth - south***

This option concentrates development outside of the Urban Area to a relatively small area to the south of Bedford putting great pressure on existing infrastructure, which is already under pressure. The Parish Council's view is that the housing needs should be shared around the Borough, which should include **eastern and northern** parishes. This would also align with rail-based growth to the north of Bedford plus along the A6 corridor.

This is the Council's **least favoured** option within Option 2.

***2b Development in and around the Urban Area, plus A421 transport corridor with rail-based growth – south, plus one new settlement***

Whilst the inclusion of a new settlement reduces the allocation to the south of Bedford it still means a large amount of development in a relatively small area. The Parish Council's view expressed earlier in this response is that the housing needs should be shared around the Borough, which should include eastern and northern parishes. This would also align with rail-based growth to the north of Bedford plus along the A6 corridor.

This is the **third favoured** option, although the Parish Council recognises that it is less challenging than Option 2c it should also include eastern and northern parishes.

***2c Development in and around the Urban Area, plus A421 transport corridor with rail-based growth, plus two new settlements***

This option requires two new settlements to be completed by 2040. Wilstead's experience with Wixams shows this would be a hard target to meet.

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The Parish Council's view expressed earlier in this response is that the housing needs should be shared around the Borough, which should include eastern and northern parishes. This would also align with rail-based growth to the north of Bedford plus along the A6 corridor.

This is the Parish Council's **second favoured** option. Although it recognises that the provision of two new settlements would be challenging, it should also include development in eastern and northern parishes.

***2d. Development in and around the Urban Area, plus A421 transport corridor with rail-based growth - south and east, plus one new settlement***

This represents the option that best shares development within the Borough. **However**, this sharing is not all around the Borough but concentrates on the south of Bedford. There should be some dwellings allocated to parishes to the north. Rail-based growth should also apply to the East West Rail route known to be north of Bedford, as well as the north of Bedford being served by the A6 and Midland Mainline rail. On this basis, strategic growth should be placed north of Bedford. The Parish Council refers to this enhanced option as **Option 2d Plus** throughout this response.

The Parish Council's preferred option is **2d Plus** with some limited allocation of dwellings north of Bedford for the reasons set out above.

**Option 2 Conclusion**

Whilst Option 2d Plus is the preferred option and Option 2a is the worst option, the differences between Options 2b and 2c are not large and dependent on the probability of the timely provision of a lot of dwellings in the new settlements towards the end of the Plan period.

Whilst Wilstead is one of the 12 parishes identified to share the 1500 dwellings suggested under Option 2d, because of its proximity to Wixams, it should not be allocated more than 125 dwellings (i.e. 1/12 of 1500). Indeed, if Option 2d Plus was adopted, the figure for these parishes could drop to below 100, which could probably be achieved without the need for additional infrastructure.

Below are the Wilshamstead Parish Council's comments on the other options put forward:

**Option 1**

***1a. In and around Urban Area only***

The Parish Council would agree that this option is not viable as it only provides 3,000 dwellings. It is not clear in the consultation document what is defined as 'around the Urban Area' as there was no indication of this illustrated on the 1a map.

***1b. Sites within the Urban Area at enhanced density***

The Parish Council believe it is unrealistic for the Borough urban area to provide all the dwellings needed in the time period 2020-2040. It should make a significant contribution, but not be the sole area that sees development.

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**Option 3**

***3a. Development in and around the urban area, plus four new settlements***

The Parish Council believe it is unrealistic for four new settlements to come to fruition in the timescale of the Plan. If this option was selected then it would mean that the vast majority of dwellings would be provided at the end of the time period which does not give an even provision to keep up with population growth and demand over time. It also creates a lot of uncertainty throughout the period of the Plan as to whether the 12,500 target would be met, which is likely to result in speculative applications being made and developers taking the local authority to challenge through the Planning Inspectorate appeal process.

The Parish Council also again note within this option there is no definition of 'around the urban area'.

***3b. Development in and around the Urban Area, plus two new settlements, plus Key Service Centres (KSC)***

The Parish Council believes that although two new settlements is more realistic than four new settlements it will still be difficult to bring two new settlements to completion within the timescales. If chosen, then one new settlement from Wyboston and Little Barford, and one from Colworth and Twinwoods should be selected and not both from the north (Colworth / Twinwoods), nor both from the north east (Little Barford / Wyboston).

Again there is no definition of 'around the urban area' within this strategy option.

The Parish Council believes that any Key Service Centre should be distant from any other Key Service Centre, so that coalescence is avoided. (See Settlement Hierarchy Designation comments below).

An allocation of 500 additional houses would be totally opposed by village residents, as was the public representation made to this proposal in the last Local Plan. In addition, it is not strategic to allocate such significant housing growth to a village without due context and understanding the impact for that village population. (See "Potential adverse effect of major development on the character of Wilshamstead Parish" - comments below)

***3c. Development in and around the Urban Area, plus two new settlements plus Key Service Centres, plus Rural Service Centres (RSC)***

Whilst the Parish Council agrees with the principle of sharing the housing need around the Borough it believes that including the Rural Service Centres with their allocation of 35 houses over 20 years will make very little difference to demand elsewhere.

The Parish Council believes that although two new settlements is more realistic than four new settlements it will still be difficult to bring two new settlements to completion within the timescales. If chosen, then one new settlement from Wyboston and Little Barford, and one from Colworth and Twinwoods should be selected and not both from the north (Colworth / Twinwoods), nor both from the north east (Little Barford / Wyboston).

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The Parish Council believes that any Key Service Centre should be distant from any other Key Service Centre so that coalescence is avoided. (See Settlement Hierarchy Designation comments below).

An allocation of 500 additional houses would be totally opposed by village residents, as was the public representation made to this proposal in the last Local Plan. In addition, it is not strategic to allocate such significant housing growth to a village without due context and understanding the impact for that village population. (See “Potential adverse effect of major development on the character of Wilshamstead Parish” - comments below)

**Option 4**

***A421 transport corridor with rail-based growth, plus Key Service Centres, plus Rural Service Centres***

The Parish Council would look to the Urban Areas to take some of the housing allocation and therefore the Parish Council would not support this option.

The Parish Council believes that any Key Service Centre should be distant from any other Key Service Centre so that coalescence is avoided. (See Settlement Hierarchy Designation comments below).

An allocation of 500 additional houses would be totally opposed by village residents, as was the public representation made to this proposal in the last Local Plan. In addition, it is not strategic to allocate such significant housing growth to a village without due context and understanding the impact for that village population. (See “Potential adverse effect of major development on the character of Wilshamstead Parish” - comments below)

**Option 5**

***A421 transport corridor with rail-based growth, plus two new settlements***

The Parish Council believes that although two new settlements is more realistic than four new settlements it will still be difficult to bring two new settlements to completion within the timescales. If chosen, then one new settlement from Wyboston and Little Barford, and one from Colworth and Twinwoods should be selected and not both from the north (Colworth / Twinwoods), nor both from the north east (Little Barford / Wyboston).

The Parish Council’s view expressed earlier in this response is that the housing needs should be shared around the Borough, which should include southern, eastern and northern parishes. This would also align with rail-based growth to the north of Bedford plus along the A6 corridor.

The Parish Council would look to the Urban Areas to take some of the housing allocation and therefore the Parish Council would not support this option.

**Option 6**

***A421 corridor with rail-based growth, plus two new settlements, plus Key Service centres, plus Rural Service Centres***

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The Parish Council would look to the Urban Areas to take some of the housing allocation and therefore the Parish Council would not support this option.

The Parish Council also believes that although two new settlements is more realistic than four new settlements it will still be difficult to bring two new settlements to completion within the timescales of the Plan.

The Parish Council believes that any Key Service Centre should be distant from any other Key Service Centres so that coalescence is avoided. (See Settlement Hierarchy Designation comments below).

An allocation of 500 additional houses would be totally opposed by village residents, as was the public representation made to this proposal in the last Local Plan. In addition, it is not strategic to allocate such significant housing growth to a village without due context and understanding the impact for that village population. (See “Potential adverse effect of major development on the character of Wilshamstead Parish” - comments below).

### **Option 7**

#### ***Developments in two new settlements, plus Key Service centres, plus Rural Service Centres***

The Parish Council would look to the Urban Areas to take some of the housing allocation and therefore the Parish Council would not support this option.

The Parish Council believes that although two new settlements is more realistic than four new settlements it will still be difficult to bring two new settlements to completion within the timescales.

The Parish Council believes that any Key Service Centre should be distant from any other Key Service Centre so that coalescence is avoided. (See Settlement Hierarchy Designation comments below).

An allocation of 500 additional houses would be totally opposed by village residents, as was the public representation made to this proposal in the last Local Plan. In addition, it is not strategic to allocate such significant housing growth to a village without due context and understanding the impact for that village population. (See “Potential adverse effect of major development on the character of Wilshamstead Parish” - comments below).

### **IN ADDITION**

Wilshamstead Parish Council would also need to be assured that Bedford Borough was working with other Local Authorities to ensure a coordinated approach. The Parish Council would not want to discover, for instance, that Central Bedfordshire was proposing large-scale development on the edge of the village (e.g. south of Wixams) which would further impact on the unique character of Wilshamstead village.

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**SECTION 2: POTENTIAL ADVERSE EFFECT OF MAJOR DEVELOPMENT IN WILSHAMSTEAD PARISH**

There are only approximately 900 houses in the village (plus 196 park homes), therefore any substantial development would completely alter the character of the community.

Wilstead is a rural community. It is vitally important to retain its rural feel by maintaining a large number of green spaces, strategic gaps between settlements and important views into the surrounding open countryside.

The village has consisted for centuries of separate “Ends” (e.g. Duck End, Church End, Littleworth). These should remain separate to preserve that heritage, not only in the timeline of this Plan but for future generations to come.

In addition, the existing, very stretched, “Ribbon Development” of Wilstead would not tolerate further development on its edges without these developing into separate communities in themselves or necessitating car journeys to the centre. Wilstead is a settled community and the Parish Council do not wish development to introduce separation. Meaning therefore, that any development to the village would have to be more central.

If a significant housing allocation were to be included for Wilstead in the strategic growth option taken forwards by the local authority, it 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.

Major development in Wilstead would necessitate people travelling by car into other communities, as these resources do not exist locally. Examples include:

- Schooling (insufficient places available locally)
- Shopping (local store cannot supply the range of goods required)
- Health facilities (none locally)
- Onward bus or train travel

**SECTION 3: SETTLEMENT HIERARCHY**

Both Wixams and Wilstead are included in the draft Local Plan as “Key Service Centres”. These Key Service Centres are in general spread around the perimeter of Bedford with gaps between them. There are only two Key Service Centres located next to one another with no gap between them, Wixams and Wilstead.

Wilshamstead Parish Council have for many years consistently highlighted this anomaly with the local authority. To reiterate, again, Wilstead should not be a Key Service Centre. Its facilities are suited to the existing size of the village – not to any expansion – given there is no Primary School capacity, only one small shop and the bus service only covers part of the village and passes more than 800m from most residents.

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It is believed that the designation of “Key Service Centre” to Wilstead is based upon incorrect assumptions. For example the village is shown in the Settlement Hierarchy document as having 3200 residents. This must be incorrect, as there are only approximately 1100 dwellings in the village and, of those, 196 are park homes for people over the age of 50. It is possible that the figure of 3200 relates to a population size including residents of Wixams; therefore allocating Key Service Centre status to both Wixams and Wilstead is **double-counting some of the residents and some facilities**. It is recognised that Option 2 does not take into account Key Service Centre designation but, nevertheless, the size of Wilstead vs other communities (and therefore its capacity to accept further development) must be more accurately assessed.

Another incorrect assumption is the presence of a part-time GP surgery. This facility no longer exists. A written statement received by the Parish Council from Oliver Street Surgery in Amphill has been received as follows: *“We unfortunately had to close the branch surgery we used to hold at the Methodist Church last year (2020) as the facilities are not fit for the purpose of a GP surgery.”*

Also the bus service in the village is very limited and should not rate a high score: there is no East to West or West to East service despite the village stretching nearly 2 miles in that direction. In addition, bus stops for the service to Bedford are located more than 800m from the majority of residents.

The above should mean that Wilstead be given Rural Service Centre status.

The Parish Council wish to highlight again, that Wilstead is in a similar situation to Oakley, which is considered to be a Rural Service Centre and sits in open countryside between Bromham and Clapham, both Key Service Centres.

This incorrect classification of Wilstead has been presented to Bedford Borough Council Planning Policy Officers on multiple occasions. What is further challenging for the Parish Council at the time of responding to this current consultation for the Local Plan 2040 document is that the Settlement Hierarchy supporting policy document, which sits alongside the strategic growth options being considered by the local authority, is currently under review. Consequently, it is not possible for the Parish Council at this time to fully convey the further areas it wishes to review in the document, given that the accompanying policy document has not been issued as part of this consultation. This is disappointing as for the Parish Council the subsidiary policy document relating to ‘Settlement Hierarchy’ is especially important.

#### **SECTION 4: COALESCENCE**

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

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The village has consisted for centuries of separate “Ends” (e.g. Duck End, Church End, Littleworth). These should remain separate to preserve that heritage, with it being expected that more detail on how this be managed should be included in the next stage of the Local Plan to reassure these rural communities.

The existing very stretched “Ribbon Development” of Wilstead would not tolerate further development on its edges without these developing into separate communities in themselves or necessitating car journeys to the centre. This is a concern to the Parish Council, as well as Wilstead residents who have first-hand experience of some of the challenges that developing like this already have. The parish is rightly proud to be a close-knit community, able to support one another, however, 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.

### **SECTION FIVE: CAPACITY OF EXISTING RESOURCES**

The village has already had to accept development of 105 houses as its contribution to the Local Plan 2030. This is an increase of over 10% which has already threatened to overwhelm local facilities – such as the local village school and the secondary school at neighbouring Wixams, both of which are at full capacity.

Development cannot be in the direct path of water draining from the Southern escarpment (Greensand Ridge) or in the lower levels north of the village centre, which are shown on Water Authority documentation as at risk of flooding from drainage ditches.

Any increase in traffic would overwhelm the existing busy rural roads which already 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 are mindful that development would therefore be contrary to saved Policy 31 of the Bedford Borough Local Plan 2030.

A recent police survey of Cotton End Road, which is becoming increasingly congested by a combination of parked vehicles and speeding traffic, concluded that the number of vehicles in a week travelling at 35mph (the prosecutable limit) was 24.6% or 4,720 vehicles. It is understood that a large proportion of this 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.

### **SECTION SIX: NEIGHBOURHOOD PLAN**

The Neighbourhood Plan for Wilstead is being prepared to be in general conformity with the adopted Bedford Borough Local Plan 2030.

The Neighbourhood Plan has been in preparation since 2017 and has undergone extensive consultation with the community and stakeholders. The Draft Submission Neighbourhood Plan has undergone formal consultation from April to June 2021 and the comments received are currently being assessed and the final Submission Neighbourhood Plan is being prepared.

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The Neighbourhood Plan includes policies to retain and protect the rural character of the Parish, to safeguard open spaces and prevent coalescence with Wixams, to ensure that new development is sensitively designed and that housing is suitable, to retain historic features and community facilities, to encourage local businesses and to tackle parking and traffic issues.

Almost all of the sites identified within the village under the “Call for Sites” process have been listed as Important Green Spaces within the draft Neighbourhood Plan and the Parish Council would be extremely concerned if any of these were suggested for development.

In addition, a large number of other neighbouring sites have been identified as important to maintain as “Strategic Gaps” to prevent coalescence with neighbouring communities. Comments against individual sites will be shown against all sites in our response to the “Site Assessment” document.

It is envisaged that the Neighbourhood Plan will be submitted to the Borough Council for publication and examination later in 2021. Referendum is likely to take place in early 2022 with the Neighbourhood Plan being made (adopted) shortly thereafter.

No housing allocations are being proposed in the Neighbourhood Plan, partly because the Local Plan 2030 did not require any allocations to be made, and partly because Wilstead has been subject to recent housing developments (over 100 houses). During consultation, residents reacted strongly against the notion of allocating any new developments of 10 houses or more, probably because of the existing level of new housing and a number of planning appeals that had been lodged in the Parish over recent years.

The Parish Council recognises that it is important to monitor the Neighbourhood Plan and check that progress is made towards meeting its objectives and policies and to respond to changes in the planning policy background. The Parish Council will consider

- if progress is being made to achieve the vision and the objectives of the Plan,
- if progress is being made towards the implementation of the policies in the Plan,
- if financial contributions available to the community arising from development are being targeted towards the identified plans and projects,
- if the Plan remains based on the most up to date information,
- if the Plan is being taken into account by Bedford Borough Council when determining planning applications.

The Parish Council will seek to work in partnership with Bedford Borough Council to liaise on future development of the Parish and will monitor progress on the Local Plan review and will consider whether to review the Neighbourhood Plan in line with the emerging Local Plan Review 2040.

If the emerging Local Plan is likely to require Wilstead Parish to accommodate further housing development in the period from 2030 to 2040, the Parish Council would prefer this requirement to be dealt with locally through a review of the Neighbourhood Plan which would allow much more local and focussed input from residents as to the location and type of development.

## **SECTION 7: CONCLUSION**

Wilshamstead Parish Council believes that all of the Borough should contribute to the housing need identified in Bedford Borough Council’s Local Plan 2040.

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The Parish Council are supportive of sharing some development across the rural communities surrounding Bedford, together with development within the urban area. 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.

The 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.

Wilstead 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 affected by large-scale development in the future. In particular it is asked that the Settlement Hierarchy review takes into account the anomalies in what has been produced so far, and this is reflected in the settlement classification now Wilstead is a relatively small size village now that it is separated from Wixams.