



Local Plan 2040

Have Your Say on the Future of Your Borough

Bedford Borough Council – Local Plan 2040 – CALL FOR SITES Draft Plan Consultation Response Form

We would prefer to receive your comments via our online system www.bedford.gov.uk/localplan2040

In particular, if you are a planning consultant or agent please help us to speed up the production of local plans by using the online system. If you require assistance, please contact us on 01234 718070.

Please only use this form if you cannot respond online and to make your comments on the Local Plan 2040 Draft Plan and its supporting documents. You will need to have the document you want to comment on to hand so that you can enter the appropriate references. Copies of the document are available to view on the Council's website www.bedford.gov.uk/LocalPlan2040 and in paper copy (**by 45 minute appointment**) at Bedford Central Library, Harpur Street, Bedford MK40 1PG (01234 718174). Subject to Covid restrictions being lifted on 19th July, paper copies will also be made available at all libraries in the borough, plus the key documents will be available at Rushden, St Neots, Biggleswade and Flitwick libraries during normal opening hours.

Please email this response form to us: **planningforthefuture@bedford.gov.uk**

Alternatively, responses can be sent by post. Please attach a stamp and send to:

Planning Policy Team
Bedford Borough Council, Borough Hall, Cauldwell Street
Bedford, MK42 9AP

PLEASE DO NOT SUBMIT COMMENTS IN MORE THAN ONE FORMAT OR SEND TO MORE THAN ONE EMAIL ADDRESS. If you have submitted comments electronically you do not need to print and post them. **All responses (electronic and paper) must be received by 5pm on 3 September 2021.**

Your contact information will be kept on the Planning Policy database so that we can keep you up to date about this and other planning policy documents. Personal data will be collected and processed in accordance with the Data Protection Act and the General Data Protection Regulations. Further information can be found on the council's Data Protection webpage and in the Privacy Notices for planning policy.

All responses will be made public.

CONTACT DETAILS

Personal details

Title

Name

Address

Postcode

Email

Your interest (Please mark X one box only)

Land owner

Resident

Consultant

Agent

Other

☐☒☐☐☐

Please use a separate form (this page) for each consultation document paragraph, policy or evidence base document you are commenting on.

Which paragraph number, policy number or evidence base document are you commenting on?

Bedford Borough Council – CALL FOR SITES

Please add your comments in the box below, and continue on an additional sheet if necessary.

Dennybrook Site 977

Land west of Wyboston (Dennybrook) Site 977

Land west of Wyboston (Dennybrook) is considered the least preferred option and should be discounted as a sustainable location for development by Bedford Borough Council. The following comments and observations relate to the Call for Sites submission by Taylor Wimpey for a 'new settlement'.

Under form ID: 977, submissions have been made for a new settlement covering around 725 Hectares of land, and providing between 7,500 – 10,150 dwellings (35 dph). BBC have identified the site as a potential 'new settlement' though providing around 2,500 new homes.

The proposed site at Dennybrook falls mostly within the Parish of Staploe. The parish is entirely rural with many narrow, single track roads (many of which are designated as unsuitable for HGVs) and no settlement policy area. It is all on grade 2 (high quality) agricultural land and it is highly valued for its peace, quiet, open countryside views and rural setting by its residents as evidenced by a Neighbourhood Plan survey conducted in early 2021. Clearly, any significant development within the Parish would make a permanent change to the landscape and the setting of the small hamlets and rural nature in the locality. Such physical changes cannot be reversed, and the Council would need to be satisfied through a thorough review of the supporting documents to the site submissions that adequately address the impacts, and in terms of achieving sustainable development – in line with Paragraph 16 of the NPPF and section 39(2) of the Planning and Compulsory Purchase Act 2004.

Housing need has been identified through the Council's LHN. Using the process set out in the Planning Practice Guidance "Housing and economic needs assessment" (MHCLG – updated December 2020) the minimum annual LHN figure is 1,305 dwellings per annum. This equates to 26,100 dwellings across the period 2020 – 2040. However, existing committed sites and windfall provide a figure of 13,000 new homes. This provides a figure of 13,100 additional dwellings over the plan period. It is noted that Bedford Borough Council need to deliver 12,500 homes as a minimum. Regardless which of the figures proposed, the strategy of option 2b (including 2,500 homes at Little Barford) meets the Council's housing requirement and negates the need for Dennybrook as a new settlement.

When looking at the spatial approach to locating new development, the proposed site at Dennybrook would be located within close proximity to St Neots, with a possible merging into Wyboston and the hamlets of Honeydon and Begwary would be engulfed by the development. Given the scale of the proposed development at Dennybrook, even at 2,500 dwellings, there would be a potential coalescence to the existing settlement of St Neots. Spatially, this would be contrary to the Council's adopted Local Plan which seeks to prevent coalescence of settlements. In addition, policy 37 of the Council's adopted Local Plan makes clear that developments need to '*Protect the landscape setting and contribute to maintaining the individual and distinct character, and separate identities of settlements by preventing coalescence...*'. It should also be taken into consideration that St Neots is experiencing its own strategic growth with an eastern extension 3,265 dwelling and 20 Ha of employment land over the plan period. Therefore, a new settlement directly to the west of the existing settlement of 2,500 would significantly increase the size of St Neots and may affect delivery rates for housing due to competing sites.

The transport impacts are acutely felt for this proposed new settlement. It is clear that the proposed development at Dennybrook would be a car reliant settlement. The proposal will not benefit from a choice of sustainable modes of transport as opposed to other developments, such as urban extensions and the proposed development at Little Barford. Little Barford offers a varied choice of sustainable modes of public transport, including the possible linkage to the East West rail station south of St Neots. It is anticipated that there will be limited employment associated with Dennybrook with commuting considered necessary to nearby employment areas, for example, south of St Neots, Bedford or Cambridge via train. This would be contrary to sustainability objectives identified by BBC, and contrary to paragraphs 73, 104, 105, 106, and 110 of the NPPF, not to mention existing policies within the adopted Local Plan, namely Policies 2S, 87, 88, and 90S.

In addition, the Dennybrook site does not align with a strategic transport corridor growth strategy, including rail.

In highways terms, it has been identified previously that Parish of Staploe is rural in character, with most of the road network narrow and single track. The inclusion of 2,500 dwellings (or over 10,000 according to the site promoted) would require significant infrastructure interventions, including the substantial widening of existing roads and junctions, which would lead to an urbanised appearance it what is a tranquil and idyllic countryside setting. Bedford Borough Council confirm within their assessment of the site submissions, that junction or highway capacity issues are a 'serious capacity constraint'.

These representations are supported by a Highways Technical Note (Appendix 1) which has reviewed the Transport Modelling undertaken by AECOM in support of the strategic options in the Draft Local Plan 2040. The Technical Note considers that the Transport Modelling is fundamentally flawed. In summary, no validation or calibration of the traffic model has been undertaken, leading to significant discrepancies. Furthermore, within the Transport Model documents, it is quoted that average departing trips are 20 to 25 vehicles. When looking at the development scenario with the transport model of 2,500 – 10,150 dwellings, and using a departure rate of 0.25 departure trip rate, this results in 625 to 2,538 departing trips all of which would be home based departure trips. The model assumes 5 loading zones which therefore means there could be 125 to 508 vehicles per loading zone. This is significantly higher than the 20 to 25 outbound vehicles used by the AECOM model, assuming they have loaded it per node. AECOM may argue that the reduction is due to sustainable modes of transport being used. However, it is made clear within paragraph 4.6 that the site offers very little in terms of alternative sustainable means of transport. Accordingly, the Transport Modelling by AECOM cannot be wholly relied upon.

The landscape setting for the Parish of Staploe is one of a rural character, containing small hamlets, interspersed agricultural buildings, small holdings and arable agricultural land. As mentioned above, the roads are narrow and winding, and contribute to the rural setting. This form of land extends from the A1 to the east to Church End, Colmworth to the east, down to Colesden to the south, and up to the Bushmead Road to the north. The landscape character is depicted within the Council's Landscape Character Assessment (LCA), updated October 2020. The wider Parish of Staploe falls within the Thurleigh Clay Farmland character area (1D). Within the 'evaluation' section at page 55 of the LCA it notes that potential future change could include Small scale development in villages which could lead to loss their distinctive character/ 'Ends'; Road upgrades affecting rural road character; Suburbanisation of villages. This would suggest that even relatively small changes would affect the rural setting of the area. Moreover, the proposed landscape strategy for the area as identified within the LCA is to 'enhance' elements of the landscape. The introduction of 2,500 new dwellings would significantly and permanently erode the rural character of the Parish, contrary to Paragraphs 20, 153, 174, and 175 of the NPPF and policy 37 of the adopted Local Plan. The Dennybrook area includes a number of roadside nature reserves which contain the rare Bath Asparagus, sulphur clover and crested cow wheat. In addition, the hedgerows are a haven for birds and wildlife such as the rare Small Eggar Moth. The fields are valued breeding sites for corn buntings, skylarks and partridge and there are a very high number of apex predators such as badgers, foxes, red kites etc. which suggest that wildlife is thriving.

There are also several Grade II Listed Buildings located within the Parish of Staploe, and would be affected by the proposed development at Dennybrook. It is evident that the Council's assessment to Call for Site states *'The proposal has the potential to cause harm to heritage assets. This harm may range from low to high. There may be options to avoid, reduce or mitigate this harm and where sites have not been ruled out altogether for other reasons, further assessment will be undertaken to more fully explore impacts on significance and options for harm reduction and mitigation. This further assessment may ultimately lead to the conclusion that the site should not be allocated.'* It is assumed by the above comments that further assessments are required before the site can be considered further as an allocation. It is clear that the existing Listed Buildings are dispersed throughout the area of the proposed development, causing potential impacts to their setting.

A further point to consider is that most of the land covered by the Parish of Staploe is Grade 2 agricultural land as identified by the Agricultural Land Classification. Paragraph 174 (b) of the NPPF makes clear that planning policies should contribute to and enhance the natural and local environment by: *'recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the **best and most versatile agricultural land**, and of*

trees and woodland...’. Grade 2 agricultural land is considered to be the best and most versatile agricultural land and would be applicable in this instance.

In addition to the above, the Sustainability Appraisal scoring for the proposed new settlement of Dennybrook identifies it as scoring lower than Spatial Option 3a. this spatial option was effectively discounted at the ‘Issues and Options’ consultation stage.

Staploe Parish Council believe that such a large development would increase the flood risk in St Neots because there are several brooks which feed into the rivers just upstream of St Neots. St Neots has experienced significant flooding – most recently in August 2020 and December 2020. The brook in Honeydon and Colmworth Brook both flooded at these times. Building on this large area of land would increase the surface water runoff and increase the flood risk in Honeydon and in St Neots.

The residents of Honeydon and Begwary would be engulfed by this development. These small hamlets would entirely lose their identities. Residents chose to live in these locations for their peace and quiet and rural character. Many keep livestock and are concerned that this may no longer be possible adjacent to a new town. Valued local views would be lost – across towards Colmworth and the church but also between Begwary and Tithe Farm and many other valued open rural views.

Residents of Staploe and Duloe would be affected by a huge increase in traffic through their hamlets and on the Bushmead Road. The Bushmead Road is not suitable for the existing level of traffic.

Residents of Staploe Parish currently benefit from access to services in St Neots. We have been able to use the schools, doctors, leisure centre, recycling centre (until very recently), and library. Residents are concerned that if large scale development occurred we would no longer be permitted to use these services because they would become overwhelmed with people from Bedfordshire. In addition, the Council along with the County or Unitary authorities, need to fully consider any infrastructure requirements that would support the level of growth that may arise from such large scale developments. The Parish Council would expect there to be an updated Infrastructure Delivery Plan that supports the Regulation 19 Pre-submission Draft Local Plan, with such updates to ensure that existing provision of services can still be relied upon by existing residents within the Parish.

Overall, the land west of Wyboston (Dennybrook) does not offer a truly sustainable form of development, and thereby contrary to policies contained within the NPPF and of the Council’s adopted Local Plan. Accordingly, the proposed new settlement should be discounted when considering sites for allocation going forward to the pre-submission draft Local Plan.

100 Word Summary Dennybrook Site 977

Dennybrook is unsuitable because: there is a risk of coalescence with St Neots, it would engulf Honeydon, the location is high quality agricultural land, it is valued as a rural location by its residents, there are no services, the roads are very narrow, it is too far from the new E-W rail station to offer sustainable transport, there are many nature reserves and listed buildings and a large development could cause flooding in St Neots. The transport modelling is flawed and underestimates the number of trips.

Cobholden Site 997

The land at Cobholden is not considered a suitable site by Staploe Parish Council and should be discounted as a sustainable location for development by Bedford Borough Council.

The proposed site falls within the Parish of Staploe. The parish is entirely rural with many narrow, single track roads (many of which are designated as unsuitable for HGVs) and no settlement policy area. It is all on grade 2 (high quality) agricultural land and it is highly valued for its peace, quiet, open countryside views and rural setting by its residents as evidenced by a Neighbourhood Plan survey conducted in early 2021.

Clearly, any significant development within the Parish would make a permanent change to the landscape and the setting of the small hamlets and rural nature in the locality. Such physical changes cannot be reversed, and the Council would need to be satisfied through a thorough review of the supporting documents to the site submissions that adequately address the impacts, and in terms of achieving sustainable development – in line with Paragraph 16 of the NPPF and section 39(2) of the Planning and Compulsory Purchase Act 2004. Housing need has been identified through the Council’s LHN. Using the process set out in the Planning Practice Guidance “Housing and economic needs assessment” (MHCLG – updated December 2020) the

minimum annual LHN figure is 1,305 dwellings per annum. This equates to 26,100 dwellings across the period 2020 – 2040. However, existing committed sites and windfall provide a figure of 13,000 new homes. This provides a figure of 13,100 additional dwellings over the plan period. It is noted that Bedford Borough Council need to deliver 12,500 homes as a minimum. Regardless which of the figures proposed, the strategy of option 2b (including 2,500 homes at Little Barford) meets the Council's housing requirement and negates the need for a development at Cobholden.

When looking at the spatial approach to locating new development, the proposed site at Cobholden would be located within close proximity to St Neots. Given the scale of the proposed development there would be a potential coalescence to the existing settlement of St Neots. Spatially, this would be contrary to the Council's adopted Local Plan which seeks to prevent coalescence of settlements. In addition, policy 37 of the Council's adopted Local Plan makes clear that developments need to '*Protect the landscape setting and contribute to maintaining the individual and distinct character, and separate identities of settlements by preventing coalescence...*'. It should also be taken into consideration that St Neots is experiencing its own strategic growth with an eastern extension 3,265 dwelling and 20 Ha of employment land over the plan period. Therefore, a new settlement directly to the west of the existing settlement of 4000+ homes would significantly increase the size of St Neots and may affect delivery rates for housing due to competing sites. The transport impacts are acutely felt for this proposed new settlement. It is clear that the proposed development at Cobholden would be a car reliant settlement. The proposal will not benefit from a choice of sustainable modes of transport as opposed to other developments, such as urban extensions and the proposed development at Little Barford. Little Barford offers a varied choice of sustainable modes of public transport, including the possible linkage to the East West rail station south of St Neots. It is anticipated that there will be limited employment associated with Cobholden with commuting considered necessary to nearby employment areas, for example, south of St Neots, Bedford or Cambridge via train. This would be contrary to sustainability objectives identified by BBC, and contrary to paragraphs 73, 104, 105, 106, and 110 of the NPPF, not to mention existing policies within the adopted Local Plan, namely Policies 2S, 87, 88, and 90S. In addition, the Cobholden site does not align with a strategic transport corridor growth strategy, including rail.

In highways terms, it has been identified previously that Parish of Staploe is rural in character, with most of the road network narrow and single track. The inclusion of large numbers of homes (the site could accommodate up to 4,200 homes at a density of 35 dph) would require significant infrastructure interventions, including the substantial widening of existing roads and junctions, which would lead to an urbanised appearance in what is a tranquil and idyllic countryside setting.

The landscape setting for the Parish of Staploe is one of a rural character, containing small hamlets, interspersed agricultural buildings, small holdings and arable agricultural land. As mentioned above, the roads are narrow and winding, and contribute to the rural setting. The landscape character is depicted within the Council's Landscape Character Assessment (LCA), updated October 2020. The wider Parish of Staploe falls within the Thurleigh Clay Farmland character area (1D). Within the 'evaluation' section at page 55 of the LCA it notes that potential future change could include Small scale development in villages which could lead to loss their distinctive character/ 'Ends'; Road upgrades affecting rural road character; Suburbanisation of villages. This would suggest that even relatively small changes would affect the rural setting of the area. Moreover, the proposed landscape strategy for the area as identified within the LCA is to 'enhance' elements of the landscape. The introduction of 4000+ new dwellings would significantly and permanently erode the rural character of the Parish, contrary to Paragraphs 20, 153, 174, and 175 of the NPPF and policy 37 of the adopted Local Plan.

The Cobholden area includes a number of roadside nature reserves which contain the rare Bath Asparagus. In addition, the hedgerows are a haven for birds and wildlife such as the rare Small Eggar Moth. The fields are valued breeding sites for corn buntings, skylarks and partridge and there are a very high number of apex predators such as badgers, foxes, red kites etc. which suggest that wildlife is thriving.

There are also several Grade II Listed Buildings located within the hamlet of Duloe and these could be affected by the proposed development at Cobholden. It is evident that the Council's assessment to Call for Site states '*The proposal has the potential to cause harm to heritage assets. This harm may range from low to high. There may be options to avoid, reduce or mitigate this harm and where sites have not been ruled out altogether for other reasons, further assessment will be undertaken to more fully explore impacts on significance and options for harm reduction and mitigation. This further assessment may ultimately lead to*

the conclusion that the site should not be allocated.’ It is assumed by the above comments that further assessments are required before the site can be considered further as an allocation.

A further point to consider is that most of the land covered by the Parish of Staploe is Grade 2 agricultural land as identified by the Agricultural Land Classification. Paragraph 174 (b) of the NPPF makes clear that planning policies should contribute to and enhance the natural and local environment by: *‘recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the **best and most versatile agricultural land**, and of trees and woodland...’*. Grade 2 agricultural land is considered to be the best and most versatile agricultural land and would be applicable in this instance.

Staploe Parish Council believe that such a large development would increase the flood risk in St Neots because there are several brooks which feed into the rivers just upstream of St Neots. St Neots has experienced significant flooding – most recently in August 2020 and December 2020. Duloe Brook flooded at these times. Building on this large area of land would increase the surface water runoff and increase the flood risk in St Neots.

The residents of Duloe would be engulfed by this development as it only contains around 40 homes and the hamlet would lose its identity. Residents chose to live in these locations for their peace and quiet and rural character. The hamlet of Duloe is currently a ribbon development with houses usually only on one side of the road. This gives each home a rural outlook on both sides. A large development such as this would fundamentally change the character of the hamlet.

Valued local views would be lost across open farmland.

Residents of Staploe, Duloe and Eaton Socon would be affected by a huge increase in traffic through the hamlets and on the Bushmead Road. The Bushmead Road is not suitable for the existing level of traffic and the approach to St Neots is past a primary school.

Overall, the land at Cobholden does not offer a truly sustainable form of development, and is thereby contrary to policies contained within the NPPF and of the Council’s adopted Local Plan. Accordingly, the proposed new development should be discounted when considering sites for allocation going forward to the pre-submission draft Local Plan.

100 Word Summary Cobholden Site 997

Cobholden is unsuitable because: there is a risk of coalescence with St Neots, it would engulf Duloe, the location is high quality agricultural land, it is valued as a rural location by its residents, there are no services, the roads are very narrow, it is too far from the new E-W rail station to offer sustainable transport, there are listed buildings and a large development could cause flooding in St Neots. The transport modelling is flawed and underestimates the number of trips.

Manor Farm Site 455

The land at Manor Farm is not considered a suitable site by Staploe Parish Council and should be discounted as a sustainable location for development by Bedford Borough Council.

The proposed site falls within the Parish of Staploe. The parish is entirely rural with many narrow, single track roads (many of which are designated as unsuitable for HGVs) and no settlement policy area. It is all on grade 2 (high quality) agricultural land and it is highly valued for its peace, quiet, open countryside views and rural setting by its residents as evidenced by a Neighbourhood Plan survey conducted in early 2021. Clearly, any significant development within the Parish would make a permanent change to the landscape and the setting of the small hamlets and rural nature in the locality. Such physical changes cannot be reversed, and the Council would need to be satisfied through a thorough review of the supporting documents to the site submissions that adequately address the impacts, and in terms of achieving sustainable development – in line with Paragraph 16 of the NPPF and section 39(2) of the Planning and Compulsory Purchase Act 2004. Housing need has been identified through the Council’s LHN. Using the process set out in the Planning Practice Guidance “Housing and economic needs assessment” (MHCLG – updated December 2020) the minimum annual LHN figure is 1,305 dwellings per annum. This equates to 26,100 dwellings across the period 2020 – 2040. However, existing committed sites and windfall provide a figure of 13,000 new homes. This provides a figure of 13,100 additional dwellings over the plan period. It is noted that Bedford Borough Council need to deliver 12,500 homes as a minimum. Regardless which of the figures proposed, the strategy

of option 2b (including 2,500 homes at Little Barford) meets the Council's housing requirement and negates the need for a development at Manor Farm.

When looking at the spatial approach to locating new development, the proposed site at Manor Farm would be located within close proximity to St Neots. Given the scale of the proposed development there would be a potential coalescence to the existing settlement of St Neots. Spatially, this would be contrary to the Council's adopted Local Plan which seeks to prevent coalescence of settlements. In addition, policy 37 of the Council's adopted Local Plan makes clear that developments need to '*Protect the landscape setting and contribute to maintaining the individual and distinct character, and separate identities of settlements by preventing coalescence...*'. It should also be taken into consideration that St Neots is experiencing its own strategic growth with an eastern extension 3,265 dwelling and 20 Ha of employment land over the plan period. Therefore, a new settlement directly to the west of the existing settlement of 300 would increase the size of St Neots and may affect delivery rates for housing due to competing sites.

It is clear that the proposed development at Manor Farm would be a car reliant settlement because it would not be within walking distance of sustainable transport. The proposal will not benefit from a choice of sustainable modes of transport as opposed to other developments, such as urban extensions and the proposed development at Little Barford. Little Barford offers a varied choice of sustainable modes of public transport, including the possible linkage to the East West rail station south of St Neots. It is anticipated that there will be limited employment associated with Manor Farm with commuting considered necessary to nearby employment areas, for example, south of St Neots, Bedford or Cambridge via train. This would be contrary to sustainability objectives identified by BBC, and contrary to paragraphs 73, 104, 105, 106, and 110 of the NPPF, not to mention existing policies within the adopted Local Plan, namely Policies 2S, 87, 88, and 90S. In addition, the Manor Farm site does not align with a strategic transport corridor growth strategy, including rail.

In highways terms, it has been identified previously that Parish of Staploe is rural in character, with most of the road network narrow and single track. The inclusion of 300 homes would require significant infrastructure interventions, including the substantial widening of existing roads and junctions, which would lead to an urbanised appearance in what is a tranquil and idyllic countryside setting.

The landscape setting for the Parish of Staploe is one of a rural character, containing small hamlets, interspersed agricultural buildings, small holdings and arable agricultural land. As mentioned above, the roads are narrow and winding, and contribute to the rural setting. The landscape character is depicted within the Council's Landscape Character Assessment (LCA), updated October 2020. The wider Parish of Staploe falls within the Thurleigh Clay Farmland character area (1D). Within the 'evaluation' section at page 55 of the LCA it notes that potential future change could include Small scale development in villages which could lead to loss their distinctive character/ 'Ends'; Road upgrades affecting rural road character; Suburbanisation of villages. This would suggest that even relatively small changes would affect the rural setting of the area. Moreover, the proposed landscape strategy for the area as identified within the LCA is to 'enhance' elements of the landscape. The introduction of 300 new dwellings would significantly and permanently erode the rural character of the Parish, contrary to Paragraphs 20, 153, 174, and 175 of the NPPF and policy 37 of the adopted Local Plan.

The hamlet of Duloe currently only has around 40 homes and is currently a ribbon development with houses usually only on one side of the road. This gives each home a rural outlook on both sides. A large development of 300 homes would fundamentally change the character of the hamlet.

The Manor Farm area includes hedgerows and a pond which are havens for birds and wildlife such as the rare Small Eggar Moth and a pond which is . The fields are valued breeding sites for corn buntings, skylarks and partridge and there are a very high number of apex predators such as badgers, foxes, red kites etc. which suggest that wildlife is thriving.

There are also several Grade II Listed Buildings located within the hamlet of Duloe and these could be affected by the proposed development at Manor Farm. It is evident that the Council's assessment to Call for Site states '*The proposal has the potential to cause harm to heritage assets. This harm may range from low to high. There may be options to avoid, reduce or mitigate this harm and where sites have not been ruled out altogether for other reasons, further assessment will be undertaken to more fully explore impacts on significance and options for harm reduction and mitigation. This further assessment may ultimately lead to the conclusion that the site should not be allocated.*' It is assumed by the above comments that further assessments are required before the site can be considered further as an allocation.

A further point to consider is that most of the land covered by the Parish of Staploe is Grade 2 agricultural land as identified by the Agricultural Land Classification. Paragraph 174 (b) of the NPPF makes clear that planning policies should contribute to and enhance the natural and local environment by: *‘recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the **best and most versatile agricultural land**, and of trees and woodland...’*. Grade 2 agricultural land is considered to be the best and most versatile agricultural land and would be applicable in this instance.

The residents of Duloe would be engulfed by this development and the hamlet would lose its identity.

Residents chose to live in these locations for their peace and quiet and rural character.

Valued local views would be lost across open farmland.

Residents of Staploe, Duloe and Eaton Socon would be affected by a huge increase in traffic through the hamlets and on the Bushmead Road. The Bushmead Road is not suitable for the existing level of traffic and the approach to St Neots is past a primary school.

Overall, the land at Manor Farm does not offer a truly sustainable form of development, and is thereby contrary to policies contained within the NPPF and of the Council’s adopted Local Plan. Accordingly, the proposed new development should be discounted when considering sites for allocation going forward to the pre-submission draft Local Plan.

100 Word Summary Manor Farm Site 455

Manor Farm is unsuitable because: there is a risk of coalescence with St Neots, it would engulf Duloe, the location is high quality agricultural land, it is valued as a rural location by its residents, there is a pond and hedgerows which contain a lot of wildlife, there are no services, the roads are very narrow, it is too far from the new E-W rail station to offer sustainable transport, there are many nature reserves and listed buildings and a large development could cause flooding in St Neots. The transport modelling is flawed and underestimates the number of trips.

Duloe Field – site 3420

The land at Duloe Field is not considered a suitable site by Staploe Parish Council and should be discounted as a sustainable location for development by Bedford Borough Council.

The proposed site falls within the Parish of Staploe. The parish is entirely rural with many narrow, single track roads (many of which are designated as unsuitable for HGVs) and no settlement policy area. It is all on grade 2 (high quality) agricultural land and it is highly valued for its peace, quiet, open countryside views and rural setting by its residents as evidenced by a Neighbourhood Plan survey conducted in early 2021. Clearly, any significant development within the Parish would make a permanent change to the landscape and the setting of the small hamlets and rural nature in the locality. Such physical changes cannot be reversed, and the Council would need to be satisfied through a thorough review of the supporting documents to the site submissions that adequately address the impacts, and in terms of achieving sustainable development – in line with Paragraph 16 of the NPPF and section 39(2) of the Planning and Compulsory Purchase Act 2004. Housing need has been identified through the Council’s LHN. Using the process set out in the Planning Practice Guidance “Housing and economic needs assessment” (MHCLG – updated December 2020) the minimum annual LHN figure is 1,305 dwellings per annum. This equates to 26,100 dwellings across the period 2020 – 2040. However, existing committed sites and windfall provide a figure of 13,000 new homes. This provides a figure of 13,100 additional dwellings over the plan period. It is noted that Bedford Borough Council need to deliver 12,500 homes as a minimum. Regardless which of the figures proposed, the strategy of option 2b (including 2,500 homes at Little Barford) meets the Council’s housing requirement and negates the need for a development at Duloe Field.

It is clear that the proposed development at Duloe Field would be a car reliant settlement because it would not be within walking distance of sustainable transport. The proposal will not benefit from a choice of sustainable modes of transport as opposed to other developments, such as urban extensions and the proposed development at Little Barford. Little Barford offers a varied choice of sustainable modes of public transport, including the possible linkage to the East West rail station south of St Neots. It is anticipated that there will be no employment associated with Duloe Field with commuting considered necessary to nearby employment areas, for example, south of St Neots, Bedford or Cambridge via train. This would be contrary to sustainability objectives identified by BBC, and contrary to paragraphs 73, 104, 105, 106, and 110 of the

NPPF, not to mention existing policies within the adopted Local Plan, namely Policies 2S, 87, 88, and 90S. In addition, the Duloe Field site does not align with a strategic transport corridor growth strategy, including rail.

In highways terms, it has been identified previously that Parish of Staploe is rural in character, with most of the road network narrow and single track. The inclusion of 25 homes would require infrastructure interventions, including the substantial widening of existing roads and junctions, which would lead to an urbanised appearance in what is a tranquil and idyllic countryside setting. This site has very poor access. The proposed access is onto a narrow, steep, single track lane with very poor visibility.

The landscape setting for the Parish of Staploe is one of a rural character, containing small hamlets, interspersed agricultural buildings, small holdings and arable agricultural land. As mentioned above, the roads are narrow and winding, and contribute to the rural setting. The landscape character is depicted within the Council's Landscape Character Assessment (LCA), updated October 2020. The wider Parish of Staploe falls within the Thurleigh Clay Farmland character area (1D). Within the 'evaluation' section at page 55 of the LCA it notes that potential future change could include Small scale development in villages which could lead to loss their distinctive character/ 'Ends'; Road upgrades affecting rural road character; Suburbanisation of villages. This would suggest that even relatively small changes would affect the rural setting of the area. Moreover, the proposed landscape strategy for the area as identified within the LCA is to 'enhance' elements of the landscape. The introduction of 300 new dwellings would significantly and permanently erode the rural character of the Parish, contrary to Paragraphs 20, 153, 174, and 175 of the NPPF and policy 37 of the adopted Local Plan.

The hamlet of Duloe currently only has around 40 homes and is currently a ribbon development with houses usually only on one side of the road. This gives each home a rural outlook on both sides. A development of 25 homes would fundamentally change the character of the hamlet.

The Duloe Field area includes hedgerows which are havens for birds and wildlife such as the rare Small Eggar Moth. The fields are valued breeding sites for corn buntings, skylarks and partridge and there are a very high number of apex predators such as badgers, foxes, red kites etc. which suggest that wildlife is thriving. These could be significantly impacted by development.

There are also several Grade II Listed Buildings located within the hamlet of Duloe which are directly within site of the proposed development. The Thatched Cottage is particularly iconic in Duloe and gives the hamlet its identity. This development would block the view of this beautiful traditional cottage as you approach from Staploe. It would also affect the view of the Dovecote. It is evident that the Council's assessment to Call for Site states *'The proposal has the potential to cause harm to heritage assets. This harm may range from low to high. There may be options to avoid, reduce or mitigate this harm and where sites have not been ruled out altogether for other reasons, further assessment will be undertaken to more fully explore impacts on significance and options for harm reduction and mitigation. This further assessment may ultimately lead to the conclusion that the site should not be allocated.'* It is assumed by the above comments that further assessments are required before the site can be considered further as an allocation. We would strongly suggest that this site would cause serious harm to heritage assets.

A further point to consider is that most of the land covered by the Parish of Staploe is Grade 2 agricultural land as identified by the Agricultural Land Classification. Paragraph 174 (b) of the NPPF makes clear that planning policies should contribute to and enhance the natural and local environment by: *'recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the **best and most versatile agricultural land**, and of trees and woodland...'*. Grade 2 agricultural land is considered to be the best and most versatile agricultural land and would be applicable in this instance.

Valued local views would be lost across open farmland to the Thatched Cottage.

Residents of Staploe, Duloe and Eaton Socon would be affected by an increase in traffic through the hamlets and on the Bushmead Road. The Bushmead Road is not suitable for the existing level of traffic and the approach to St Neots is past a primary school.

Residents of Staploe Parish currently benefit from access to services in St Neots. We have been able to use the schools, doctors, leisure centre, recycling centre (until very recently), and library. Residents are concerned that if large scale development occurred we would no longer be permitted to use these services

because they would become overwhelmed with people from Bedfordshire. In addition, the Council along with the County or Unitary authorities, need to fully consider any infrastructure requirements that would support the level of growth that may arise from such large scale developments. The Parish Council would expect there to be an updated Infrastructure Delivery Plan that supports the Regulation 19 Pre-submission Draft Local Plan, with such updates to ensure that existing provision of services can still be relied upon by existing residents within the Parish.

The bottom of the field floods and there is constant runoff down the road from the site in wet weather. Overall, the land at Duloe Field does not offer a truly sustainable form of development, and is thereby contrary to policies contained within the NPPF and of the Council's adopted Local Plan. Accordingly, the proposed new development should be discounted when considering sites for allocation going forward to the pre-submission draft Local Plan.

100 Word Summary Duloe Field Site 3420

Duloe Field is unsuitable because: the location is high quality agricultural land, it is valued as a rural location by its residents, there are no services, the adjacent roads are very narrow with steep sides and sharp bends, it is too far from the new E-W rail station to offer sustainable transport, there are listed buildings (Thatched Cottage and the Dovecote) very close to the site and the development would block views of these buildings which are important "placemakers" in the hamlet. The bottom part of the site floods.

Top Homes Site 931

The land at Top Homes is not considered a suitable site by Staploe Parish Council and should be discounted as a sustainable location for development by Bedford Borough Council.

The proposed site falls within the Parish of Staploe. The parish is entirely rural with many narrow, single track roads (many of which are designated as unsuitable for HGVs) and no settlement policy area. It is all on grade 2 (high quality) agricultural land and it is highly valued for its peace, quiet, open countryside views and rural setting by its residents as evidenced by a Neighbourhood Plan survey conducted in early 2021. Clearly, any significant development within the Parish would make a permanent change to the landscape and the setting of the small hamlets and rural nature in the locality. Such physical changes cannot be reversed, and the Council would need to be satisfied through a thorough review of the supporting documents to the site submissions that adequately address the impacts, and in terms of achieving sustainable development – in line with Paragraph 16 of the NPPF and section 39(2) of the Planning and Compulsory Purchase Act 2004. Housing need has been identified through the Council's LHN. Using the process set out in the Planning Practice Guidance "Housing and economic needs assessment" (MHCLG – updated December 2020) the minimum annual LHN figure is 1,305 dwellings per annum. This equates to 26,100 dwellings across the period 2020 – 2040. However, existing committed sites and windfall provide a figure of 13,000 new homes. This provides a figure of 13,100 additional dwellings over the plan period. It is noted that Bedford Borough Council need to deliver 12,500 homes as a minimum. Regardless which of the figures proposed, the strategy of option 2b (including 2,500 homes at Little Barford) meets the Council's housing requirement and negates the need for a development at Top Homes.

When looking at the spatial approach to locating new development, the proposed site at Top Homes would be located within close proximity to St Neots. Given the scale of the proposed development there would be a potential coalescence to the existing settlement of St Neots. Spatially, this would be contrary to the Council's adopted Local Plan which seeks to prevent coalescence of settlements. In addition, policy 37 of the Council's adopted Local Plan makes clear that developments need to '*Protect the landscape setting and contribute to maintaining the individual and distinct character, and separate identities of settlements by preventing coalescence...*'. It should also be taken into consideration that St Neots is experiencing its own strategic growth with an eastern extension 3,265 dwelling and 20 Ha of employment land over the plan period. Therefore, a new settlement directly to the west of the existing settlement of 400 would increase the size of St Neots and may affect delivery rates for housing due to competing sites.

It is clear that the proposed development at Top Homes would be a car reliant settlement because it would not benefit from a choice of sustainable modes of transport as opposed to other developments, such as urban extensions and the proposed development at Little Barford. Little Barford offers a varied choice of sustainable modes of public transport, including the possible linkage to the East West rail station south of St

Neots. It is anticipated that there will be limited employment associated with Top Homes with commuting considered necessary to nearby employment areas, for example, south of St Neots, Bedford or Cambridge via train. This would be contrary to sustainability objectives identified by BBC, and contrary to paragraphs 73, 104, 105, 106, and 110 of the NPPF, not to mention existing policies within the adopted Local Plan, namely Policies 2S, 87, 88, and 90S. In addition, the Top Homes site does not align with a strategic transport corridor growth strategy, including rail.

In highways terms, it has been identified previously that Parish of Staploe is rural in character, with most of the road network narrow and single track. The inclusion of 400 homes would require significant infrastructure interventions, including the substantial widening of existing roads and junctions, which would lead to an urbanised appearance in what is a tranquil and idyllic countryside setting.

The landscape setting for the Parish of Staploe is one of a rural character, containing small hamlets, interspersed agricultural buildings, small holdings and arable agricultural land. As mentioned above, the roads are narrow and winding, and contribute to the rural setting. The landscape character is depicted within the Council's Landscape Character Assessment (LCA), updated October 2020. The wider Parish of Staploe falls within the Thurleigh Clay Farmland character area (1D). Within the 'evaluation' section at page 55 of the LCA it notes that potential future change could include Small scale development in villages which could lead to loss their distinctive character/ 'Ends'; Road upgrades affecting rural road character; Suburbanisation of villages. This would suggest that even relatively small changes would affect the rural setting of the area. Moreover, the proposed landscape strategy for the area as identified within the LCA is to 'enhance' elements of the landscape. The introduction of 400 new dwellings would significantly and permanently erode the rural character of the Parish, contrary to Paragraphs 20, 153, 174, and 175 of the NPPF and policy 37 of the adopted Local Plan.

The hamlet of Duloe currently only has around 40 homes and is currently a ribbon development with houses usually only on one side of the road. This gives each home a rural outlook on both sides. A large development of 400 homes would fundamentally change the character of the hamlet.

The Top Homes area includes fields which are valued breeding sites for corn buntings, skylarks and partridge.

A further point to consider is that most of the land covered by the Parish of Staploe is Grade 2 agricultural land as identified by the Agricultural Land Classification. Paragraph 174 (b) of the NPPF makes clear that planning policies should contribute to and enhance the natural and local environment by: *'recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the **best and most versatile agricultural land**, and of trees and woodland...'*. Grade 2 agricultural land is considered to be the best and most versatile agricultural land and would be applicable in this instance.

The residents of Duloe would be significantly affected by this development and the hamlet would lose its identity. Residents chose to live in these locations for their peace and quiet and rural character.

Valued local views would be lost across open farmland.

Residents of Staploe, Duloe and Eaton Socon would be affected by a huge increase in traffic through the hamlets and on the Bushmead Road. The Bushmead Road is not suitable for the existing level of traffic and the approach to St Neots is past a primary school.

Residents of Staploe Parish currently benefit from access to services in St Neots. We have been able to use the schools, doctors, leisure centre, recycling centre (until very recently), and library. Residents are concerned that if large scale development occurred we would no longer be permitted to use these services because they would become overwhelmed with people from Bedfordshire. In addition, the Council along with the County or Unitary authorities, need to fully consider any infrastructure requirements that would support the level of growth that may arise from such large scale developments. The Parish Council would expect there to be an updated Infrastructure Delivery Plan that supports the Regulation 19 Pre-submission Draft Local Plan, with such updates to ensure that existing provision of services can still be relied upon by existing residents within the Parish.

The site is directly adjacent to the A1. Any development here would rule out any improvements to the A1 in future.

Overall, the land at Top Homes does not offer a truly sustainable form of development, and is thereby contrary to policies contained within the NPPF and of the Council's adopted Local Plan. Accordingly, the proposed new development should be discounted when considering sites for allocation going forward to the pre-submission draft Local Plan.

This site has now effectively been replaced by Eaton Bank. Please see our comments on Eaton Bank below.

100 word summary Top Homes Site 931

Top Homes is unsuitable because: there is a risk of coalescence with St Neots, the location is high quality agricultural land, it is valued as a rural location by its residents, there are no services, the roads are very narrow, it is too far from the new E-W rail station to offer sustainable transport, a large development could cause flooding in St Neots. The transport modelling is flawed and underestimates the number of trips. Development here would rule out any improvements to the A1 in future. (See later comments re Eaton Bank).

Flints Field Site 930

The land at Flints Field is not considered a suitable site by Staploe Parish Council and should be discounted as a sustainable location for development by Bedford Borough Council.

The proposed site falls within the Parish of Staploe. The parish is entirely rural with many narrow, single track roads (many of which are designated as unsuitable for HGVs) and no settlement policy area. It is all on grade 2 (high quality) agricultural land and it is highly valued for its peace, quiet, open countryside views and rural setting by its residents as evidenced by a Neighbourhood Plan survey conducted in early 2021. Clearly, any significant development within the Parish would make a permanent change to the landscape and the setting of the small hamlets and rural nature in the locality. Such physical changes cannot be reversed, and the Council would need to be satisfied through a thorough review of the supporting documents to the site submissions that adequately address the impacts, and in terms of achieving sustainable development – in line with Paragraph 16 of the NPPF and section 39(2) of the Planning and Compulsory Purchase Act 2004. Housing need has been identified through the Council's LHN. Using the process set out in the Planning Practice Guidance "Housing and economic needs assessment" (MHCLG – updated December 2020) the minimum annual LHN figure is 1,305 dwellings per annum. This equates to 26,100 dwellings across the period 2020 – 2040. However, existing committed sites and windfall provide a figure of 13,000 new homes. This provides a figure of 13,100 additional dwellings over the plan period. It is noted that Bedford Borough Council need to deliver 12,500 homes as a minimum. Regardless which of the figures proposed, the strategy of option 2b (including 2,500 homes at Little Barford) meets the Council's housing requirement and negates the need for a development at Flints Field.

When looking at the spatial approach to locating new development, the proposed site at Flints Field would be located within close proximity to St Neots. Given the scale of the proposed development there would be a potential coalescence to the existing settlement of St Neots. Spatially, this would be contrary to the Council's adopted Local Plan which seeks to prevent coalescence of settlements. In addition, policy 37 of the Council's adopted Local Plan makes clear that developments need to '*Protect the landscape setting and contribute to maintaining the individual and distinct character, and separate identities of settlements by preventing coalescence...*'. It should also be taken into consideration that St Neots is experiencing its own strategic growth with an eastern extension 3,265 dwelling and 20 Ha of employment land over the plan period. Therefore, a new settlement directly to the west of the existing settlement of 400 would increase the size of St Neots and may affect delivery rates for housing due to competing sites.

It is clear that the proposed development at Flints Field would be a car reliant settlement because it would not benefit from a choice of sustainable modes of transport as opposed to other developments, such as urban extensions and the proposed development at Little Barford. Little Barford offers a varied choice of sustainable modes of public transport, including the possible linkage to the East West rail station south of St Neots. It is anticipated that there will be limited employment associated with Flints Field with commuting considered necessary to nearby employment areas, for example, south of St Neots, Bedford or Cambridge via train. This would be contrary to sustainability objectives identified by BBC, and contrary to paragraphs 73, 104, 105, 106, and 110 of the NPPF, not to mention existing policies within the adopted Local Plan,

namely Policies 2S, 87, 88, and 90S. In addition, the Flints Field site does not align with a strategic transport corridor growth strategy, including rail.

In highways terms, it has been identified previously that Parish of Staploe is rural in character, with most of the road network narrow and single track. The inclusion of 400 homes would require significant infrastructure interventions, including the substantial widening of existing roads and junctions, which would lead to an urbanised appearance in what is a tranquil and idyllic countryside setting.

The landscape setting for the Parish of Staploe is one of a rural character, containing small hamlets, interspersed agricultural buildings, small holdings and arable agricultural land. As mentioned above, the roads are narrow and winding, and contribute to the rural setting. The landscape character is depicted within the Council's Landscape Character Assessment (LCA), updated October 2020. The wider Parish of Staploe falls within the Thurleigh Clay Farmland character area (1D). Within the 'evaluation' section at page 55 of the LCA it notes that potential future change could include Small scale development in villages which could lead to loss their distinctive character/ 'Ends'; Road upgrades affecting rural road character; Suburbanisation of villages. This would suggest that even relatively small changes would affect the rural setting of the area. Moreover, the proposed landscape strategy for the area as identified within the LCA is to 'enhance' elements of the landscape. The introduction of 400 new dwellings would significantly and permanently erode the rural character of the Parish, contrary to Paragraphs 20, 153, 174, and 175 of the NPPF and policy 37 of the adopted Local Plan.

The hamlet of Duloe currently only has around 40 homes and is currently a ribbon development with houses usually only on one side of the road. This gives each home a rural outlook on both sides. A large development of 400 homes would fundamentally change the character of the hamlet.

The Flints Field area includes fields which are valued breeding sites for corn buntings, skylarks and partridge.

A further point to consider is that most of the land covered by the Parish of Staploe is Grade 2 agricultural land as identified by the Agricultural Land Classification. Paragraph 174 (b) of the NPPF makes clear that planning policies should contribute to and enhance the natural and local environment by: '*recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the **best and most versatile agricultural land**, and of trees and woodland...*'. Grade 2 agricultural land is considered to be the best and most versatile agricultural land and would be applicable in this instance.

The residents of Duloe would be significantly affected by this development and the hamlet would lose its identity. Residents chose to live in these locations for their peace and quiet and rural character.

Valued local views would be lost across open farmland.

Residents of Staploe, Duloe and Eaton Socon would be affected by a huge increase in traffic through the hamlets and on the Bushmead Road. The Bushmead Road is not suitable for the existing level of traffic and the approach to St Neots is past a primary school.

Residents of Staploe Parish currently benefit from access to services in St Neots. We have been able to use the schools, doctors, leisure centre, recycling centre (until very recently), and library. Residents are concerned that if large scale development occurred we would no longer be permitted to use these services because they would become overwhelmed with people from Bedfordshire. In addition, the Council along with the County or Unitary authorities, need to fully consider any infrastructure requirements that would support the level of growth that may arise from such large scale developments. The Parish Council would expect there to be an updated Infrastructure Delivery Plan that supports the Regulation 19 Pre-submission Draft Local Plan, with such updates to ensure that existing provision of services can still be relied upon by existing residents within the Parish.

The site is directly adjacent to the A1. Any development here would rule out any improvements to the A1 in future.

Overall, the land at Flints Field does not offer a truly sustainable form of development, and is thereby contrary to policies contained within the NPPF and of the Council's adopted Local Plan. Accordingly, the proposed new development should be discounted when considering sites for allocation going forward to the pre-submission draft Local Plan.

This site has now effectively been replaced by Eaton Bank. Please see our comments on Eaton Bank below

100 word summary Flints Field Site 930

Flints Field is unsuitable because: there is a risk of coalescence with St Neots, the location is high quality agricultural land, it is valued as a rural location by its residents, there are no services, the roads are very narrow, it is too far from the new E-W rail station to offer sustainable transport, a large development could cause flooding in St Neots. The transport modelling is flawed and underestimates the number of trips. Development here would rule out any improvements to the A1 in future. (See later comments re Eaton Bank).

Little Barford Site 907

We support development of this site. It is adjacent to the urban area and to the likely location of the new East West rail station. It therefore provides options for genuinely sustainable transport as both stations in St Neots are likely to be within walking / cycling distance. It is also a smaller site so it would not grow into a new town of 10,800 homes as Dennybrook could. A much larger development such as Dennybrook would have a significant impact on St Neots and its services whereas Little Barford is smaller and would have a lower impact on the town. It is also on the side of St Neots where strategic, planned growth is already happening (Loves Farm and Wintringham Park to the east), unlike Dennybrook which is positioned to the west where the A1 has always provided a clear dividing line between urban to the east and rural land to the west.

Much of the site appears to be grade 3 agricultural land in contrast with Dennybrook which is grade 2. Little Barford has good connectivity to the A428 (existing and new) and A1.

100 word summary Little Barford site 907

This site is suitable because it will be within walking / cycling distance of the new East West rail station and also close to the existing mainline station. It is close to the strategic growth points in St Neots (Wintringham Park) with good access to the A1 and A421. It is not such good quality agricultural land as Dennybrook – it appears to be grade 3.

Twinwoods Site 883

We support development of 70ha of this site which is brownfield land as an alternative if Little Barford is deemed unsuitable. At 35dph this could provide 2450 homes which is sufficient to support option 2b with a new settlement if Little Barford was not an option. Brownfield sites should be used in preference to greenfield sites according to the NPPF. We recognise that there are problems with the A6 into Bedford but we believe these issues need to be resolved even with the development proposed for the 2030 plan and to enable residents from the north of Bedford to access the new east west rail. Therefore a new settlement of 2450 homes at Twinwoods would provide the infrastructure funding for this. Sustainable transport could be provided via a parkway station or guided busway and a park and ride bus for the private schools. The area does not flood, and it is distinct from local villages so there is no risk of coalescence or loss of identity of existing settlements or villages. Development here would support Bedford town centre.

100 word summary Twinwoods site 883

Twinwoods is suitable because it is a brownfield site. Development here could provide infrastructure funding to alleviate the issues on the A6. Eg. by providing a guided busway / park and ride bus for the private schools. The area doesn't flood and would support Bedford town centre.

Colworth Site 1002

This area is a green field site but it is lower grade agricultural land than Dennybrook. The site was supported by Sharnbrook Parish Council when put forward in the previous 2035 draft local plan. If

sustainable transport could be provided eg. via a guided busway or parkway station to the new east west rail station and town centre then this site could provide a suitable option. It was put forward as a suitable site for development in the 2035 Local Plan before this plan was abandoned. Highway constraints were not seen as insurmountable at that time.

Eaton Bank (site submitted 2nd September 2021) – one day before the consultation ended

Staploe Parish Council cannot understand how Bedford Borough Council can consider late site submissions such as Eaton Bank (submitted 2nd Sept – a day before the consultation closed) when members of the public have not been given sufficient opportunity to comment. We believe this is deeply unfair and heavily skewed in favour of the landowners and developers at the expense of local residents. There has been no assessment made in terms of sustainability as required by the 'call for sites' process,

As part of the current Regulation 18 Local Plan consultation Bedford Borough Council have invited comments from the general public on not just the draft Local Plan but also the sites identified as part of the 'call for sites' process. If the Council are truly inviting public engagement, then they should allow sufficient time for comments for the new site at 'Eaton Bank' or discount it altogether.

Secondly, the Regulations contained within the Town and Country Planning (Local Planning) (England) Regulations 2012 do not specify or prescribe how the Reg. 18 consultation should be carried out in relation to a 'call for sites' process and consideration of those sites. However, it does state at Reg. 18 (3) that *'In preparing the local plan, the local planning authority **must take into account any representation made to them in response to invitations under paragraph (1)**'*. [our bold emphasis]. 'invitations under Paragraph 1 include the general public. Therefore the Council should take into account ours and the general public's representations. In support of this point, the Council should refer to its own Statement of Community Involvement (SCI - table 1, page 21).

The land at Eaton Bank is not considered a suitable site by Staploe Parish Council and should be discounted as a sustainable location for development by Bedford Borough Council.

The proposed site falls within the Parish of Staploe. The parish is entirely rural with many narrow, single track roads (the road through Duloe is designated as unsuitable for HGVs) and no settlement policy area. It is all on grade 2 (high quality) agricultural land and it is highly valued for its peace, quiet, open countryside views and rural setting by its residents as evidenced by a Neighbourhood Plan survey conducted in early 2021. Clearly, any significant development within the Parish would make a permanent change to the landscape and the setting of the small hamlets and rural nature in the locality. Such physical changes cannot be reversed, and the Council would need to be satisfied through a thorough review of the supporting documents to the site submissions that adequately address the impacts, and in terms of achieving sustainable development – in line with Paragraph 16 of the NPPF and section 39(2) of the Planning and Compulsory Purchase Act 2004.

Housing need has been identified through the Council's LHN. Using the process set out in the Planning Practice Guidance "Housing and economic needs assessment" (MHCLG – updated December 2020) the minimum annual LHN figure is 1,305 dwellings per annum. This equates to 26,100 dwellings across the period 2020 – 2040. However, existing committed sites and windfall provide a figure of 13,000 new homes. This provides a figure of 13,100 additional dwellings over the plan period. It is noted that Bedford Borough Council need to deliver 12,500 homes as a minimum. Regardless which of the figures proposed, the strategy of option 2b (including 2,500 homes at Little Barford) meets the Council's housing requirement and negates the need for a development at Eaton Bank.

When looking at the spatial approach to locating new development, the proposed site at Eaton Bank would be located within close proximity to St Neots and would reach right up to the existing hamlet of Duloe. Given the scale of the proposed development there would be a potential coalescence of the hamlet of Duloe to the existing settlement of St Neots. Spatially, this would be contrary to the Council's adopted Local Plan which seeks to prevent coalescence of settlements. In addition, policy 37 of the Council's adopted Local Plan makes clear that developments need to *'Protect the landscape setting and contribute to maintaining the individual and distinct character, and separate identities of settlements by **preventing coalescence**...'*. Although close to the settlement of St Neots in distance, the A1 currently marks the clear and defined

boundary to the urban area the roadway being the dominant feature in the landscape that creates a hard transition to the rural area. The Dennybrook proposal would disrupt this and represent the bleeding of urban built form crossing the A1 into the rural area beyond.

It should also be taken into consideration that St Neots is experiencing its own strategic growth with an eastern extension 3,265 dwelling and 20 Ha of employment land over the plan period. Therefore, a new settlement directly to the west of the existing settlement of 2500-3000 homes would increase the size of St Neots and may affect delivery rates for housing due to competing sites. Due to its proximity to St Neots there is a high risk of delays in planning the development and therefore risks of it not being built in time to satisfy the annual housing requirements for the Local Plan 2040.

It is clear that the proposed development at Eaton Bank would be a car reliant settlement because it would not benefit from a choice of sustainable modes of transport as opposed to other developments, such as urban extensions and the proposed development at Little Barford. Little Barford offers a varied choice of sustainable modes of public transport, including the possible linkage to the East West rail station south of St Neots. It is anticipated that there will be limited employment associated with Eaton Bank with commuting considered necessary to nearby employment areas, for example, south of St Neots, Bedford or Cambridge via train. This would be contrary to sustainability objectives identified by BBC, and contrary to paragraphs 73, 104, 105, 106, and 110 of the NPPF, not to mention existing policies within the adopted Local Plan, namely Policies 2S, 87, 88, and 90S. In addition, the Eaton Bank site does not align with a strategic transport corridor growth strategy, including rail. The location is sufficiently far from a rail station that it would necessitate a car journey to access it. The bus service from Eaton Socon would necessitate a 20 minute walk to the bus stop at Meadowsweet followed by a 20 minute journey to the main rail station. Buses travel every 30 minutes so there would be a likely wait time of 5 minutes to add to this making a total of 45 minutes. People are far more likely to use their cars for a 10 minute drive to the station.

In highways terms, it has been identified previously that the Parish of Staploe is rural in character, with most of the road network narrow and single track. The inclusion of 2500-3000 homes would require significant infrastructure interventions, including the substantial widening of existing roads and junctions, which would lead to an urbanised appearance in what is a tranquil and idyllic countryside setting. The landscape setting for the Parish of Staploe is one of a rural character, containing small hamlets, interspersed agricultural buildings, small holdings and arable agricultural land. As mentioned above, the roads are narrow and winding, and contribute to the rural setting. The landscape character is depicted within the Council's Landscape Character Assessment (LCA), updated October 2020. The wider Parish of Staploe falls within the Thurleigh Clay Farmland character area (1D). Within the 'evaluation' section at page 55 of the LCA it notes that potential future change could include Small scale development in villages which could lead to loss their distinctive character/ 'Ends'; Road upgrades affecting rural road character; Suburbanisation of villages. This would suggest that even relatively small changes would affect the rural setting of the area. Moreover, the proposed landscape strategy for the area as identified within the LCA is to 'enhance' elements of the landscape. The introduction of 2500-3000 new dwellings would significantly and permanently erode the rural character of the Parish, contrary to Paragraphs 20, 153, 174, and 175 of the NPPF and policy 37 of the adopted Local Plan.

The hamlet of Duloe currently only has around 40 homes and is currently a ribbon development with houses usually only on one side of the road. This gives each home a rural outlook on both sides. A large development of 2500-3000 homes would fundamentally change the character of the hamlet.

The Eaton Bank area includes fields which are valued breeding sites for corn buntings, skylarks and partridge.

A further point to consider is that most of the land covered by the Parish of Staploe is Grade 2 agricultural land as identified by the Agricultural Land Classification. Paragraph 174 (b) of the NPPF makes clear that planning policies should contribute to and enhance the natural and local environment by: *'recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the **best and most versatile agricultural land**, and of trees and woodland...'*. Grade 2 agricultural land is considered to be the best and most versatile agricultural land and would be applicable in this instance.

The residents of Duloe would be significantly affected by this development and the hamlet would lose its identity. Residents chose to live in these locations for their peace and quiet and rural character. Valued local views would be lost across open farmland.

There are important listed buildings in the area such as Anchor Cottage (5, Duloe), Thatched Cottage and the Dovecote in Woodhouse Lane. These would be adversely affected by the development.

Residents of Staploe, Duloe and Eaton Socon would be affected by a huge increase in traffic through the hamlets and on the Bushmead Road. The Bushmead Road is not suitable for the existing level of traffic and the approach to St Neots is past a primary school.

Residents of Staploe Parish currently benefit from access to services in St Neots. We have been able to use the schools, doctors, leisure centre, recycling centre (until very recently), and library. Residents are concerned that if large scale development occurred we would no longer be permitted to use these services because they would become overwhelmed with people from Bedfordshire.

There are significant landscape impacts and the physical alterations to the land will be permanent.

The site is directly adjacent to the A1. Any development here would rule out any in situ improvements to the A1 in future.

Overall, the land at Eaton Bank does not offer a truly sustainable form of development, and is thereby contrary to policies contained within the NPPF and of the Council's adopted Local Plan. Accordingly, the proposed new development should be discounted when considering sites for allocation going forward to the pre-submission draft Local Plan.

Eaton Bank 100 word summary

Eaton Bank is unsuitable because: it was submitted late, there is a risk of coalescence / urban sprawl with St Neots, the location is high quality agricultural land, it is valued as a rural location by its residents, there are no services, the roads are very narrow, it is too far from the new E-W rail station to offer sustainable transport, a large development could cause flooding in St Neots. Development here would rule out any improvements to the A1 in future.

Comments received from residents about Eaton Bank:

Kevin and Jayne Pavely of Anchor Cottage 5 Duloe.

We have had the privilege to live and be custodians of our 300+ year old Grade II listed former public house 'Anchor Cottage' for 34 happy years after lovingly restoring it and making it a safe and comfortable home for us and our children.

We have enjoyed the rural country setting for all these years, I have enjoyed horseriding around the beautiful tracks and walking our dogs around Duloe and Staploe. We have enjoyed the close proximity of St. Neots town the A1 has always been the border between town and country. If even one house is to be built our side of the A1 Duloe, its rural, tranquil and peaceful existence will be gone forever to urban sprawl. We strongly object to any development of this scale in our village however we did support the renovation and small development of Manor Farm Barns as that would have enhanced the village but this application was subsequently turned down by planning at Beds conservation due to the impact on the historic buildings.

We enjoy many a sunset across our surroundings having great crested newts in the neighbouring pond, majestic barn owls fly effortlessly around us at dusk, we have muntjac deer, foxes, hares, wild kite and badgers visiting us frequently in our garden all of which will be gone forever.

Furthermore this is on the Bedfordshire/Cambridgeshire

Border some 10 miles from Bedford town and St. Neots simply doesn't have the infrastructure to accommodate such a large number of new houses and people.

Therefore we would like to do everything possible to halt this proposed housing development of a predicted 2500+ homes.

It's become apparent that this particular application was submitted within just a few hours prior to the deadline. It is very unfair that we were not given the chance to comment or oppose to these plans as members of the public.

John and Tina Hobbs, Thatched Cottage, 39, Duloe

I am writing to object to both proposals on behalf of the occupants (John and Tina Hobbs) of Thatched Cottage, 39 Duloe. We have enough to contend with at the moment with Dennybrook and the expansion of the existing solar farm, which we also object to. These new proposals will have an enormous impact on the hamlet of Duloe.

My wife and myself moved here nearly twenty years ago and nothing much has happened with regard to development until last year, now it seems we have a new scheme every month to contend with. I personally blame the greed of the local landowners in our parish. My wife and I feel totally let down by Bedford Borough's planning system and Mayor who do not appear to be playing by the rules or listening to us or our parish council. It's as though our parish council counts for nothing.

John Mafioli and Charlotte Quince, 4, Duloe

We moved to Duloe three years ago. We chose Duloe, as it is a beautiful English hamlet surrounded by open countryside, arable fields and a small rural community, an ideal place to start a family. Our house sits within farmed fields and has open views - our slice of paradise.

It is, therefore unfathomable that Bedford Borough Council would even consider turning Duloe into a housing estate. Duloe's separate character and separation should be protected from urban sprawl and coalescence with Eaton Socon and St Neots by the Borough's own local gap designations and planning policies which stress how essential it is to protect important green spaces and valued local landscapes which we all know are so fundamental and the overwhelming reason why many people choose to live here.

Bedford Borough owe it to follow due process and protocol and to resist opportunistic applications that put the needs of unscrupulous landowners ahead of its own existing residents. We vehemently oppose all development proposals in our small and special hamlet including Manor Farm, but this proposal, Eaton Bank, which has sneaked in under the radar at the eleventh hour, just as the Local Plan Consultation was drawing to a close, and almost a year after the closing date for the Borough's Call for Sites submission, has avoided wider public scrutiny and will also destroy our family home and our chosen way of life. Even the thought of it has already put our neighbours and friends under unbelievable stress at the thought of their homes and village being destroyed.

Bedford Borough and local landowners have already identified over 400 sites for development. We do not need this one! And, as taxpayers of Bedford Borough and concerned and vulnerable residents, we look to the Council to protect us and to oppose this greedy and selfish application that has broken with due process and protocol that will swallow the tiny hamlet of Duloe with its 38 houses. The Council must prioritise previously developed land and non open countryside instead.

Any new residents would use St Neots town and services, not Bedford, just as we do - putting an intolerable burden on an already overstretched and saturated infrastructure which is not fit for purpose even now. We have been here for three years and have not been into Bedford or used any services there at all. All of our shopping, our doctors, hospitals and future schools are or will be in Cambridgeshire as would be the case for any new residents in this area.

If Bedford Council keep building housing estates that destroy existing villages where will people seeking a village life live? There are so many other options to choose from that won't have these devastating consequences so choose one of those!

To use Bedford Council's own wording when rightly rejecting previous planning applications in Duloe:

1. The proposed residential development is located in the open countryside and is not a sustainable form of development. The development is therefore contrary to Policy 7S of the Bedford Borough Local Plan 2030.

2. The proposed residential development would introduce an overly domesticated appearance to the site ... which would adversely impact on the existing agricultural and rural landscape character and the historic character and appearance of the location. The proposal is therefore contrary to policy 7S, 29 i), ii) and 30 i), of the Bedford Borough Local Plan 2030 and the aims of the National Planning Policy Framework 2019.

3. The proposed development would result in a significant loss of evidential, historic and aesthetic value to the existing buildings on site and would harm the character of the non-designated heritage assets and their setting. The proposed development is therefore considered to be contrary to Policy 41S and by extension Policies 7S and 65 of the Bedford Borough Local Plan 2030 and paragraphs 79 and 197 of the National Planning Policy Framework 2019.

4. The proposed dwellings would be reliant upon the private car, would not allow occupants to make a meaningful contribution to supporting the vitality and viability of the very limited services and facilities in nearby settlements and would not contribute to the creation of a safe, accessible and healthy community. As a result, the location of the application site for residential development is considered to be in conflict with Policies 2S and 3S of the Bedford Borough Local Plan 2030 and in conflict with Para 78 of the National Planning Policy Framework (NPPF). The proposal is also contrary to paragraphs 91, 102 and 103 of the NPPF, which aim to promote safe, accessible and healthy communities.

If the Council say this about building 3 houses here, how could they consider building **any** new houses in our beautiful hamlet let alone 100s or even 2,500?!

Gerardine Meola, 49, Woodhouse Lane, Duloe PE19 5HR

I have completed my representation on line for the above consultation, however I am now aware that two sites submitted (Flint Field and Top Home - 930 and 931) are much larger and are combined as one settlement, referred to as Eaton Bank.

Eaton Bank will impact upon me directly, as the land submitted now comes up to my back garden fence in Duloe.

I would like to strongly object:

I should have the right to be consulted on it.

The full site was submitted after the call for site deadline, in August 2020, had closed - a full year after the deadline?

It will merge with St Neots in Cambridgeshire and be seen as an extension of St Neots.

This settlement would predominately provide houses for St Neots residents not Bedford residents, as Bedford is 11 miles away and St Neots would be right next to it?

The roads from the settlement into St Neots in Cambridgeshire already have traffic calming measures, small roundabouts and are in the vicinity of schools and there is only one bridge over the river which already becomes congested. This is not a suitable place for a large new settlement for Bedford Borough.

It will be a car journey to the new EWR station so will increase traffic in St Neots or around it.

The settlement would be built on open countryside in Bedford Borough.

The land is high grade food producing land in Bedford Borough.

It would obliterate Duloe, a hamlet in Bedford Borough.

Duloe has only 35 houses of which 4 are listed.

The roads surrounding Duloe are rural in character with hedgerows and at several points are single track, no path and rutted verge. To change them would further destroy the character of Duloe.

I want to live in an existing settlement in open countryside, in a hamlet with the characteristics of the English countryside; listed buildings, horse paddocks, a field, a Common, high hedges, simple roads a farm building, open views - a true rural setting. This describes Duloe - it is rural.

I don't want to live in a developers 'Vision' of what they think rural living is.

Open space is not an open agricultural field.

Bedford Borough Council are custodians of our countryside and they must protect it, it is a precious resource for our future and a link with our past.

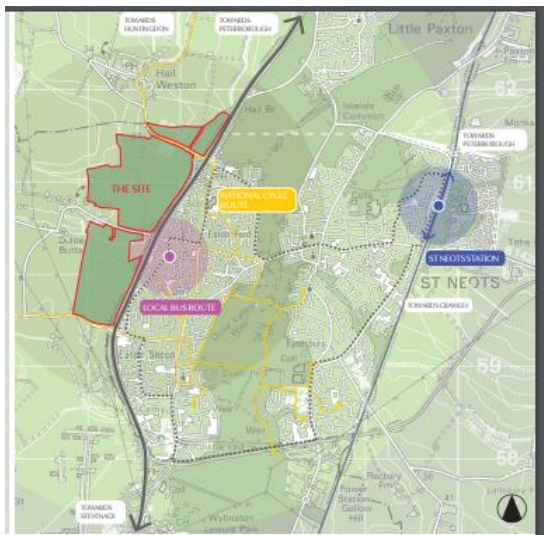
I absolutely object to a settlement that destroys the historic hamlet of Duloe.

Simon Goodship, 42, Duloe Lane

I would like to register my objection to the site known as Eaton Bank in Duloe shown below and ask you to pass it on to the Planning for the Future Team at Bedford Borough Council.

Figure 1 Eaton Bank development. Source: Eaton Bank Vision Document p6, Thakeham.

My objection is based on the following:



1. It was submitted one day before the consultation closed and there was no opportunity for residents to comment on it.

2. This is a rural location currently classed as open countryside. A recent neighbourhood plan survey clearly showed that residents (including ourselves) do not support extensive development in our parish. We value our parish for its quiet, rural environment, its wildlife and its countryside views.

3. This is a greenfield site on grade 2 agricultural land. We do not support the use of high quality agricultural land for housing development.

4. The local roads in Duloe are totally unsuitable for large scale development and widening the roads would damage the rural character of the hamlet. The approaches to St Neots on the Bushmead Road are through a residential area past a

primary school and not suited to large increases in traffic. Further the access to the east through Eaton Socon/St Neots and west through Duloe are insufficient and unsuitable for construction and development, let alone occupation. The road through Duloe is narrow with no pavements and a number of bends, let alone a narrow single carriageway lane bottleneck.

5. The location is sufficiently far from a rail station that it would necessitate a car journey to access it. The bus service from Eaton Socon would necessitate a 20 minute walk to the bus stop at Meadowsweet followed by a 20 minute journey to the main rail station. People are far more likely to use their cars for a 10 minute drive to the station. Current trends are a majority of multiple vehicles per address.
6. The A1 has been the boundary between the urban area of Eaton Socon and the completely rural area to the west for 70 years. St Neots is already expanding with significant, planned urban extensions to the east; to add 3000 homes directly to the west would put unsustainable pressure on the services in St Neots and change the character of this market town. It would also cause coalescence of St. Neots / Eaton Socon and Duloe which is contrary to planning policy.
7. This site is directly adjacent to the A1. There has been talk for many years of upgrading the A1 in this area. A development here makes any improvements / widening in situ impossible.
8. The delivery of this site is likely to be slow as it will require careful planning with St Neots Town Council and Huntingdonshire District Council.

9. I am also concerned that the late submission of this site is a deliberate attempt to stifle the opportunity for public consultation and submission of opposing opinion.

Helen and Rod Thompson, Maye Cottage, Woodhouse Lane, Duloe

100% against the Eaton Bank proposal. This proposal seems to be built on greed and gives no consideration to the rural community of Duloe which it effectively finishes let alone the ever more valuable food producing land we will lose.

Philip and Bernadette Y. The Butts, Duloe

I would like to formally object in the strongest terms possible to the proposed development at Eaton Bank in its entirety. Having recently purchased a property in Duloe and investing significantly in it, my wife and I have committed ourselves to living in the hamlet, the open countryside and the lifestyle that affords. This 'forever home' plan would be devastated if the proposal were to be successful. The proposal of circa 2500 houses, on a hamlet of some 35 houses is obscene in the extreme and is grossly disproportionate, well beyond the Parish's neighbourhood plan, which has the overwhelming support from residents of the Parish.

The contentious nature of the plan itself has been underlined by the manner in which the plan was submitted into Bedfordshire council, for which I understand Staploe Parish Council will be filing a complaint, of which I support. I also find it highly inappropriate that the proposer of the plan was a councillor on the Parish council and able to influence views and the Council's attentions, whilst at the same time had been preparing to submit these plans. It is perhaps not a conflict of interest, but it is certainly highly questionable conduct, despite the proposers subsequent resignation from the Parish Council.

To conclude, this is a plan that is grossly disproportionate, unwarranted, builds upon open countryside contrary to many of Bedfordshire councils own policies (as referenced by other resident's complaints) and has been filed in a manner that brings the entirety of the planning process into disrepute and should be rejected in its entirety.

Pat Gough, 2, Duloe

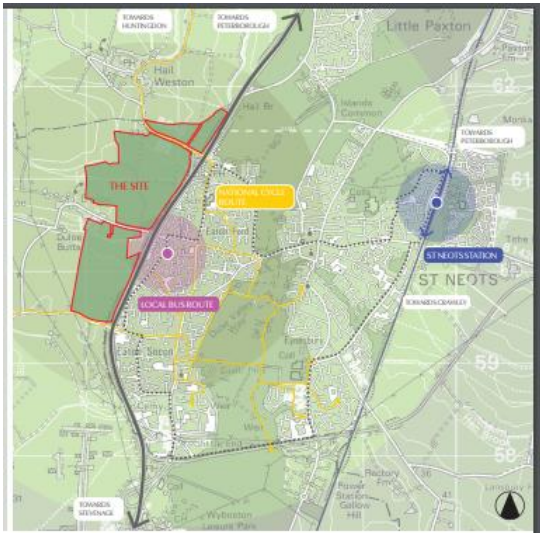
To say I am devastated to hear of Richard's selfish plans is a massive understatement. To consider a hamlet the size of Duloe for such a large development is unbelievable. The strain it will put on the community and its amenities is unthinkable. It's already virtually impossible to get a doctor's appointment or a hospital referral. My husband and I moved to this village 40 years ago with our young family and we have enjoyed every minute of the peace and quiet of village life. We worked hard over the years to achieve our goals as most people do. Sadly my husband passed away 2 years ago but he was content in the knowledge that he had provided for me. My only real asset is my house and home which now will be devalued as a result of submitting these plans. If permission is granted for this development the house will be unsellable. Who wants to buy a house in the middle of a construction project? I just can't face the prospect of living with the noise, heavy traffic and air pollution for what may well be the rest of my life. Not to mention the anxiety and stress this has already caused for a whole village.

Miri and Simon Goodship, 42, Duloe Lane PE19 5HP

Dear Mrs Crawford,

I would like to register my objection to the site known as Eaton Bank in Duloe shown below and ask you to pass it on to the Planning for the Future Team at Bedford Borough Council.

Figure 2 Eaton Bank development. Source: Eaton Bank Vision Document p6, Thakeham.



My objection is based on the following:

1. It was submitted one day before the consultation closed and there was no opportunity for residents to comment on it.
2. This is a rural location currently classed as open countryside. A recent neighbourhood plan survey clearly showed that residents (including ourselves) do not support extensive development in our parish. We value our parish for its quiet, rural environment, its wildlife and its countryside views.
3. This is a greenfield site on grade 2 agricultural land. We do not support the use of high quality agricultural land for housing development.
4. The local roads in Duloe are totally unsuitable for large scale development and widening the roads would damage the rural character of the hamlet. The approaches to St Neots on the Bushmead Road are through a residential area past a primary school and not suited to large increases in traffic. Further the access to the east through Eaton Socon/St Neots and west through Duloe are insufficient and unsuitable for construction and development, let alone occupation. The road through Duloe is narrow with no pavements and a number of bends, let alone a narrow single carriageway lane bottleneck.
5. The location is sufficiently far from a rail station that it would necessitate a car journey to access it. The bus service from Eaton Socon would necessitate a 20 minute walk to the bus stop at Meadowsweet followed by a 20 minute journey to the main rail station. People are far more likely to use their cars for a 10 minute drive to the station. Current trends are a majority of multiple vehicles per address.
6. The A1 has been the boundary between the urban area of Eaton Socon and the completely rural area to the west for 70 years. St Neots is already expanding with significant, planned urban extensions to the east; to add 3000 homes directly to the west would put unsustainable pressure on the services in St Neots and change the character of this market town. It would also cause coalescence of St. Neots / Eaton Socon and Duloe which is contrary to planning policy.
7. This site is directly adjacent to the A1. There has been talk for many years of upgrading the A1 in this area. A development here makes any improvements / widening in situ impossible.
8. The delivery of this site is likely to be slow as it will require careful planning with St Neots Town Council and Huntingdonshire District Council.
9. I am also concerned that the late submission of this site is a deliberate attempt to stifle the opportunity for public consultation and submission of opposing opinion.

Gill and Tom Tagg, Prescott, Staploe PE19 5JA

Dear Mrs Crawford,

We would like to register our strongest objections to the site known as Eaton Bank in Duloe shown below and ask you to pass these on to the Planning for the Future Team at Bedford Borough Council (BBC).

Figure 1 Eaton Bank development. Source: Eaton Bank Vision Document p6, Thakeham.

Our objections are based on the following:

1. It was submitted some 10 months after the BBC Call for Sites closed and one day before the Local Plan 2040 consultation closed. There has been no opportunity for residents to comment on it.
2. This is a rural location currently classed as open countryside. A recent neighbourhood plan survey clearly showed that residents (including ourselves) do not support extensive development in our parish. We value our parish for its quiet, rural environment, its wildlife and its countryside views.
3. This is a greenfield site on grade 2 agricultural land. We do not support the use of high quality agricultural land for housing development.
4. The local roads in Duloe are totally unsuitable for large scale development and

widening the roads would damage the rural character of the hamlet. The approaches to St Neots on the Bushmead Road are through a residential area past a primary school and not suited to large increases in traffic.

5. The location is sufficiently far from a rail station that it would necessitate a car journey to access it. The bus service from Eaton Socon would necessitate a 20 minute walk to the bus stop at Meadowsweet followed by a 20 minute journey to the main rail station. People are far more likely to use their cars for a 10 minute drive to the station.

6. The A1 has been the boundary between the urban area of Eaton Socon and the completely rural area to the west for 70 years. St Neots is already expanding with significant, planned urban extensions to the east; to add 3000 homes directly to the west would put unsustainable pressure on the services in St Neots and change the character of this market town. It would also cause coalescence of St. Neots / Eaton Socon and Duloe which is contrary to planning policy.

7. This site is directly adjacent to the A1. There has been talk for many years of upgrading the A1 in this area. A development here makes any improvements / widening in situ impossible.

8. The delivery of this site is likely to be slow as it will require careful planning with St Neots Town Council and Huntingdonshire District Council.

This is an unsustainable proposal that will destroy the natural countryside landscape, the long countryside views, the local ecology and wildlife, some of which is rare and only found in this and one other area of the UK. The reasons for this proposal's unsuitability are very similar to those of the Dennybrook proposal, and like Dennybrook, it fails to meet almost all of the aspects of BBC's Local Plan 2040 Vision.

The fact that it has been submitted cynically one day before the Local Plan 2040 consultation closed, prevents local residents expressing their views. If BBC now consider this in their Local Plan 2040 review, then this is undemocratic and yet again a presumption in favour of developers.

Stephen Kent, Falling Water House, Staploe PE19 5JA

Dear Mrs Crawford,

I would like to register my objection to the site known as Eaton Bank in Duloe shown below and ask you to pass it on to the Planning for the Future Team at Bedford Borough Council.

Figure 1 Eaton Bank development. Source: Eaton Bank Vision Document p6, Thakeham.

My objection is based on the following:

1. It was submitted one day before the consultation closed and there was no opportunity for residents to comment on it.

2. This is a rural location currently classed as open countryside. A recent neighbourhood plan survey clearly showed that residents (including ourselves) do not support extensive development in our parish. We value our parish for its quiet, rural environment, its wildlife and its countryside views.

3. This is a greenfield site on grade 2 agricultural land. We do not support the use of high quality agricultural land for housing development.

4. The local roads in the area are totally unsuitable for large scale development and widening the roads would damage the rural character of the area. Widening the roads in the hamlet of Duloe is impracticable given the close proximity of housing to the road.

5. The approaches to St Neots on the Bushmead Road are through a residential area past a primary school and not suited to large increases in traffic.

6. The location is sufficiently far from a rail station that it would necessitate a car journey to access it. The bus service from Eaton Socon would necessitate a 20 minute walk to the bus stop at Meadowsweet followed by a 20 minute journey to the main

rail station. People are far more likely to use their cars for a 10 minute drive to the station.

7. The A1 has been the boundary between the urban area of Eaton Socon and the completely rural area to the west for 70 years. St Neots is already expanding with significant, planned urban extensions to the east; to add 3000 homes directly to the west would put unsustainable pressure on the services in St Neots and change the character of this market town. It would also cause coalescence of St. Neots / Eaton Socon and Duloe which is contrary to planning policy.

8. This site is directly adjacent to the A1. There has been talk for many years of upgrading the A1 in this area. A development here makes any improvements / widening in situ impossible.

9. The delivery of this site is likely to be slow as it will require careful planning with St Neots Town Council and Huntingdonshire District Council.

10. It is my belief that we should prioritise the redevelopment of brownfield sites in our town and city centres. The loss of product retail in our town centres provides a large number of redevelopment opportunities.

Kevin and Jo Morrall, 24, Duloe Lane PE19 5HP

Dear Mrs Crawford,

I would like to register my objection to the site known as Eaton Bank in Duloe shown below and ask you to pass it on to the Planning for the Future Team at Bedford Borough Council.



Figure 1 Eaton Bank development. Source: Eaton Bank Vision Document 96, Thakeham.

My objection is based on the following:

1. It was submitted one day before the consultation closed and there was no opportunity for residents to comment on it. Even up to the moment the consultation closed, this site did not feature on the interactive call for sites map (the Council's preferred method for the public to comment on individual sites). Even today, 12 days after the consultation closed, the proposed site does not feature anywhere on Bedford Borough Council's website. For the Council to claim that this site submission was part of the Local Plan Consultation that closed on 3rd September, contravenes and contradicts every single aspect of the Council's own Statement of Community Involvement 2019. Though I oppose the development of this site I support the lawful assessment of it with a public consultation.
2. The proposed site for Eaton Brook contains 2 sites (930 and 931) submitted as part of the call for sites for the Local Plan consultation that closed on 3rd September. It is the same land owner for these sites and the entirety of the site proposed for Eaton Bank. Though the Eaton Bank Vision Document is dated 15th September and change control shows it as revision 00, this type of document takes a significant amount of time to produce, review and publish. As the call for sites only required top level information (size, location and approximate number of houses), sites 930 and 931 should have been revised or replaced at the earliest opportunity. The timing of the submission (in my opinion) shows a blatant attempt by the land owner and developer to mislead the Council and the public as to the scope of the development, and in turn circumvent the planning process.
3. This is a rural location currently classed as open countryside. A recent neighbourhood plan survey clearly showed that residents (including ourselves) do not support extensive development in our parish. We value our parish for its quiet, rural environment, its wildlife and its countryside views.
4. This is a greenfield site on grade 2 agricultural land. We do not support the use of high quality agricultural land for housing development.
5. I refute the claim made by Thakeham Developers regarding a net gain to biodiversity. Biodiversity for a specific site is finite, and this site is so diverse that it is not biologically possible to increase it by 20%. Appendix 1 shows my response to site 455, this site is directly adjacent to the site proposed for Eaton Bank and my comments regarding the species that would be affected are directly applicable.

6. The local roads in Duloe are totally unsuitable for large scale development and widening the roads would damage the rural character of the hamlet. The approaches to St Neots on the Bushmead Road are through a residential area past a primary school and not suited to large increases in traffic_

7. The location is sufficiently far from a rail station that it would necessitate a car journey to access it. The bus service from Eaton Socon would necessitate a 20 minute walk to the bus stop at Meadowsweet followed by a 20 minute journey to the main rail station. People are far more likely to use their cars for a 10 minute drive to the station. This is further supported by Thakeham's only vision document. "All Thakeham homes will have a fast-electric vehicle charging point". Directly implying that Thakeham expects this development to add a minimum of 3000 cars to the regions road network.

8. The A1 has been the boundary between the urban area Of Eaton Socon and the completely rural area to the west for 70 years. St Neots is already expanding with significant, planned urban extensions to the east: to add 3000 homes directly to the west would put unsustainable pressure on the services in St Neots and change the character of this market town. It would also cause coalescence of St. Neots / Eaton Socon and Duloe which is contrary to planning policy. The very name for the development 'Eaton Bank' shows that this is both expected and intended.

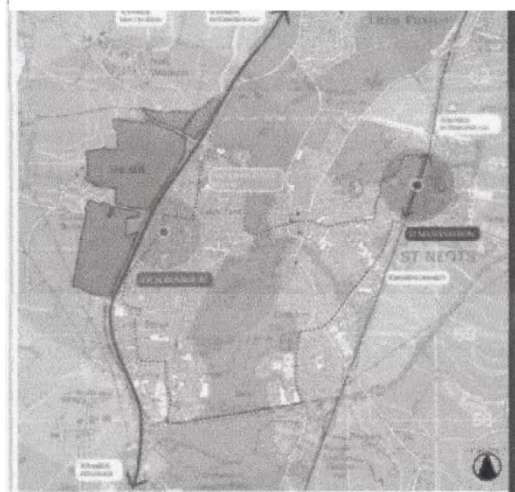
9. This site is directly adjacent to the A1. There has been talk for many years of upgrading the A1 in this area. A development here makes any improvements / widening in situ impossible.

10. The delivery of this site is likely to be slow as it will require careful planning with St Neots Town Council and Huntingdonshire District Council.

Mark Potts and Soo Kelly, Orchard Cottage, Duloe

I would like to register my objection to the site known as Eaton Bank in Duloe shown below and ask you to pass it on to the Planning for the Future Team at Bedford Borough Council.

Figure 1 Eaton Bank development. Source: Eaton Bank Vision Document p6, Thakeham.



My objection is based on the following:

1. It was submitted one day before the consultation closed and there was no opportunity for residents to comment on it.
2. This is a rural location currently classed as open countryside. A recent neighbourhood plan survey clearly showed that residents (including ourselves) do not support extensive development in our parish. We value our parish for its quiet, rural environment, its wildlife and its countryside views.
3. This is a greenfield site on grade 2 agricultural land. We do not support the use of high quality agricultural land for housing development.

4. The local roads in Duloe are totally unsuitable for large scale development and widening the roads would damage the rural character of the hamlet. The approaches to St Neots on the Bushmead Road are through a residential area past a primary school and not suited to large increases in traffic.

5. The location is sufficiently far from a rail station that it would necessitate a car journey to access it. The bus service from Eaton Socon would necessitate a 20 minute walk to the bus stop at Meadowsweet followed by a 20 minute journey to the main rail station. People are far more likely to use their cars for a 10 minute drive to the station.

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would also cause coalescence of St. Neots / Eaton Socon and Duloe which is contrary to planning policy.

7. This site is directly adjacent to the A1. There has been talk for many years of upgrading the A1 in this area. A development here makes any improvements / widening in situ impossible.

8. The delivery of this site is likely to be slow as it will require careful planning with St Neots Town Council and Huntingdonshire District Council.

9. Bedford Borough Council recently rejected a planning application to build 3 houses in this area, their reasons were.. "The proposed residential development would introduce an overly domesticated appearance to the site ... which would adversely impact on the existing agricultural and rural landscape character and the historic character and appearance of the location. The proposal is therefore contrary to policy 75, 29 i), ii) and 30 i), of the Bedford Borough Local Plan 2030 and the aims of the National Planning Policy Framework 2019."

Yet it seems it's now okay for a development of some 2.5 to 3 thousand houses.

The following residents signed a copy of the letter below:

Adam Tarran, 48, Duloe PE19 5HP

Mr and Mrs Ginty, 35, Duloe PE19 5HP

Andrew and Tracy Purser, 32, Duloe PE19 5HP

Mrs F. A. Eason, Daneshill, Woodhouse Lane, Duloe PE19 5HR

Sue Benson, 46, Duloe, PE19 5HP

Samantha Bygraves, 30, Duloe PE19 5HP

P. Staughton, 28, Duloe PE19 5HP

Resident, 26, Duloe PE19 5HP

P. Matthews, 31, Park Road, Duloe PE19 5HP

Robert and Sheila Browning, College Farm Bungalow, Duloe

William Eason, 33, Rookery Road, Wyboston

Frances Brightman, 62, Duloe

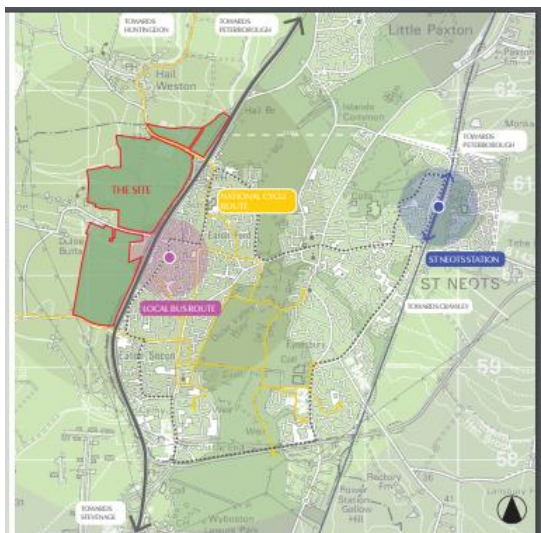
Andrea Whitham and David Rawlins, East Cottage, Manor Farm Lane, Honeydon

Lucy Crawford, 33, Staploe PE19 5JA

I would like to register my objection to the site known as Eaton Bank in Duloe shown below and ask you to pass it on to the Planning for the Future Team at Bedford Borough Council.

Figure 3 Eaton Bank development. Source: Eaton Bank Vision Document p6, Thakeham.

My objection is based on the following:



1. It was submitted one day before the consultation closed and there was no opportunity for residents to comment on it.

2. This is a rural location currently classed as open countryside. A recent neighbourhood plan survey clearly showed that residents (including ourselves) do not support extensive development in our parish. We value our parish for its quiet, rural environment, its wildlife and its countryside views.

3. This is a greenfield site on grade 2 agricultural land. We do not support the use of high quality agricultural land for housing development.

4. The local roads in Duloe are totally unsuitable for large scale development and widening the roads would damage the rural character of the hamlet. The approaches to St Neots on the Bushmead Road are through a residential area past a

primary school and not suited to large increases in traffic.

5. The location is sufficiently far from a rail station that it would necessitate a car journey to access it. The bus service from Eaton Socon would necessitate a 20 minute walk to the bus stop at Meadowsweet followed by a 20 minute journey to the main rail station. People are far more likely to use their cars for a 10 minute drive to the station.

6. The A1 has been the boundary between the urban area of Eaton Socon and the completely rural area to the west for 70 years. St Neots is already expanding with significant, planned urban extensions to the east; to add 3000 homes directly to the west would put unsustainable pressure on the services in St Neots and change the character of this market town. It would also cause coalescence of St. Neots / Eaton Socon and Duloe which is contrary to planning policy.
7. This site is directly adjacent to the A1. There has been talk for many years of upgrading the A1 in this area. A development here makes any improvements / widening in situ impossible.
8. The delivery of this site is likely to be slow as it will require careful planning with St Neots Town Council and Huntingdonshire District Council.