

Representation form for the Bedford Borough Local Plan 2040: Plan for Submission (Regulation 19 publication stage)

Please refer to the [guidance notes](#) available before completing this form.
Please return to Bedford Borough Council by 5pm on 29th July 2022.

This form has two parts –
Part A – Personal details: need only be completed once.
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal details*

2. Agent's details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	Mrs	
First name	Lucy	
Last name	Crawford	
Job title (where relevant)	Parish Clerk	
Organisation (where relevant)	Staploe Parish Council	
Address line 1	33, Staploe Lane	
Line 2	Staploe	
Line 3	St Neots	
Line 4	Bedfordshire	
Postcode	PE19 5JA	
Telephone number	01480 471 526	
E-mail address (where relevant)	clerk@staploe-pc.gov.uk	

Part B – Please use a separate sheet for each representation

Name or organisation: Staploe Parish Council

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

Paragraph	1.4	Policy		Policies Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	☒	No	☐
4.(2) Sound	Yes	☒	No	☐
4 (3) Complies with the Duty to co-operate	Yes	☒	No	☐

Please tick as appropriate

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

Comment:

Staploe Parish Council were concerned that the issues and options consultation was not compliant and therefore the plan would not be justified because it relied on this consultation. It described our parish as a brownfield, urban site with under utilised land when actually it is a greenfield site in open countryside with highly productive grade 2 agricultural land. However, the Borough Council appear to have listened to our concerns and so we are happy with the outcome and believe the plan to be compliant and sound. Little Barford is a more suitable location than our parish as it is closer to the new rail station and on grade 3 agricultural land.

Similarly we were concerned that the "Draft Plan: Strategy options and draft policies" consultation in July 2021 was not compliant because it referred to Dennybrook (the largest of the proposed new settlements) as a development of only 2,500 homes when in fact the development would eventually be 11,500 homes – this was not made clear in the consultation. However, the Borough Council appear to have discounted this settlement so we believe the outcome is compliant and sound.

The transport modelling for the settlement at Wyboston (Dennybrook) was flawed in that there were errors in the number of transport movements stated. However, as this settlement has not been proposed in this final plan we believe the outcome is compliant and sound.

Finally, we were concerned that the "Draft Plan: Strategy options and draft policies" consultation in July 2021 included a call for sites and sites such as an expansion of Dennybrook and a new site (Eaton Bank) were considered even though they were submitted well after the submission deadline (and in the case of Eaton Bank it was submitted on the last day of the consultation). This gave little if any opportunity for residents to comment on them. However, since these sites have not been included in the final plan we believe the outcome is compliant and sound.

The Duty to Cooperate statement demonstrates that meetings have been held with Central Bedfordshire and Huntingdonshire Councils and with many relevant agencies but little detail has been given about how they will manage the level of development planned for the area around St Neots. This is going to be important for St. Neots with the proposed new settlement at Little Barford. St Neots are also developing to the east at Loves Farm and Wintringham Park. It will also be very close to new developments proposed in Central Bedfordshire at Tempsford so we would like to see more in the plan about how Little Barford will integrate with these sites and how it will affect St Neots town's services, town centre and the surrounding road network.

100 word summary:

Originally Staploe Parish Council objected to the issues and options consultation. Described our parish as a brownfield, urban site with under utilised land when it is a greenfield site in open countryside with highly productive grade 2 agricultural land.

Objected to the "Draft Plan: Strategy options and draft policies". Referred to Dennybrook as a development of 2,500 homes - not clear that it would eventually be 11,500. Transport modelling mistakes. The Borough Council have discounted this settlement so **we support the outcome**. Object to sites being considered after the deadline.

The Duty to Cooperate with St Neots will be important.

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

None needed to make it legally compliant and sound but we would like to see how the Borough Council have cooperated with St. Neots Town Council / Huntingdonshire / Cambs Councils and Central Bedfordshire Council.

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

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

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

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

☒

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

☐

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

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

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

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

Part B – Please use a separate sheet for each representation

Name or organisation: *Staploe Parish Council*

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

Paragraph	4.4	Policy	DS2S	Policies Map	
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4.(2) Sound	Yes	✓	No	
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Please tick as appropriate

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We support this policy which proposes growth on brownfield sites, sites south of Bedford and at a new settlement in Little Barford. This is in keeping with the NPPF which states that brownfield sites, and sites with sustainable transport links are preferred and that grade 1 and 2 agricultural land should be avoided.

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None needed to make it legally compliant and sound but we would like to see more detail about how the Borough Council have cooperated with St. Neots Town Council / Huntingdonshire / Cambs Councils and Central Bedfordshire Council.

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