



Flitwick Town Council

Central Bedfordshire Council (CBC)

Local Plan Submitted Sites Consultation

Proposed Flitwick Town Council (FTC) Response

1. Sites FTC Support for Inclusion

FTC will support the inclusion of the following sites in CBC's emerging Local Plan:

Site Number	Recommendation	Note
135298 / 136291 (Town Centre area, next to Keech Hospice charity shop on Steppingley Road – Flitwick Parish)	Support – Employment / Residential	Earmarked as access to the proposed CBC multi-storey car park, the bungalow on this site was demolished around 10 years but it remains undeveloped. Development would improve the street scene here, although the Council still supports delivery of the multi storey car park. In the absence of delivery of the multi storey car park the Council supports its use for mixed employment and residential development (employment at ground floor level/ residential above).
136681 (Along Froghall Road, adjacent to the railway line – Flitwick Parish)	Support – Residential	Development of this site which lies between the Froghall Field development and the railway would improve the street scene and suits sensible in-fill. Previously discounted by planning officers for residential and allocated for employment use, it has already been removed from Green Belt designation. However, poor road access for HGVs makes employment use likely to be unsuitable; the Council supports its use for employment and/or, residential, provided concerns about residential amenity can be addressed.
136701 (Horse pasture across River Flit from Willow Way)	Support – Standalone Green Spaces	This is an area of Green Belt land (currently in FW3) to the South of Flitwick and one of several water meadows (part of flood plain) between the railway line and Greenfield Road. The southern

		boundary of the site is the River Flit, the western boundary is the railway line. A public footpath (part of the Flit Valley Walk) and a culvert run along the northern boundary. The meadow floods regularly in winter and is served by footpaths and a footbridge across the River Flit. It, and the surrounding water meadows, provide a peaceful riverside amenity enjoyed by residents and visitors for leisure use including walking and access to nature.
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2. Sites FTC Support for Inclusion Provided Constraints Are Met/ Overcome

FTC will support the inclusion of the following sites, while noting that specific site constraints will need to be addressed:

Site Number	Recommendation	Note
136737 (Undeveloped land near Aldi, Ampthill Road/ Froghall Road– Flitwick Parish)	Support if constraints met Residential	Development could improve this aspect of the street scene near Aldi. However, access from Froghall Road raises safety concerns, and building here would narrow the Green Belt gap that keeps Flitwick and Ampthill visually and physically separate, a separation residents value. The Council supports residential development here provided suitable access is secured and the site layout ensures that a landscape buffer on the Froghall Road boundary is secured.
136816 (Between Commerce Way Industrial Estate and the Nature Park – Flitwick Parish)	Support part of site for inclusion for employment use	Green Belt site (in FW1) comprising Grade 2 agricultural land which is currently farmed for arable use. The frontage of this site could suit modest commercial expansion beside the existing Commerce Way Industrial Estate provided a suitable access from Maulden Road can be accommodated. However, the proposed site as drawn also includes the Pussy Pond, a historic feature valued for biodiversity, is within the Green Belt (part of FW1) and within the foreground to Flitwick Moor SSSI. The Council would therefore wish to see the removal of the rear part of the site to preserve the historic feature and to ensure the green corridor to the Nature Park and to Flitwick Moor are retained.
135343 (Steppingley Hospital and Orchid Lane site — Steppingley Parish)	Support – for healthcare and/ or low density and low rise employment use if constraints met on closure of Steppingley Hospital Object for residential	The site is already developed land in the Green Belt (as part of FW5) and could find itself redefined as Grey Belt in the forthcoming review. FW5's strongest characteristic is however to prevent neighbouring towns merging, where it is described as making a relatively strong contribution. Should the Steppingley Hospital closure proceed, the Council would support redevelopment of this site as part of a Health Hub for this area of Central Bedfordshire or low density and low-rise employment use, similar to that at Doolittle Mill, assuming there is local demand for such a use. Development of this site, in isolation, for residential purposes will make little to no contribution to meeting the new housing requirements that Flitwick is likely to be expected to deliver in the local plan period to 2050; the loss of Green Belt and extension of the settlement boundary here is not proportionate to any benefit

Site Number	Recommendation	Note
		to delivering housing need that it is likely to deliver. Further, the site is not considered to be a sustainable one, being some distance from the centre of Flitwick. Access to the site is also poor, being via Froghall Road which is a poorly maintained country road that which narrows to a single lane at various points. Further, residential development of this site without the delivery of substantial new public infrastructure, including a GP surgery/ walk in centre or health clinic, is not supported, as its loss would not outweigh the harm the development would otherwise cause to the Green Belt, surrounding countryside and existing infrastructure and would on its own be an inappropriate expansion of Flitwick's settlement boundary. There would also be concerns about the amenity of future residents given the site's close proximity to the new crematorium. The Council would wish to see retention of the existing hedgerow on Froghall Road in the context of any development to help screen it.

3. Sites FTC Object To

FTC will object to the inclusion of the following sites in the Local Plan.

3.1 General Issues Applying to All Objected Sites

General issues which apply to all sites that FTC objects to development:

- **Traffic and highways** – This a significant constraint to further development of Flitwick; the road network has already been demonstrated as operating at capacity, with the three key roundabouts (Tesco, High Street and A5120/ Steppingley Road) all operating at or above capacity and there being no realistic prospect of improvement to them. The railway bridge between Tesco and the High Street roundabouts is a permanent bottleneck with no realistic prospect of widening, and there is no viable bypass. It is also to be noted that traffic is diverted through Flitwick if either the nearest north or south bound carriageway of the M1 is closed as a result of an accident or need for highways works, which causes significant traffic problems. This issue will need to be addressed and a solution found before further large-scale development is planned.
- **Health infrastructure**– There have long been calls by residents for a new GP surgery in Flitwick given the difficulty many have experienced accessing appointments at the Highlands Surgery. The COVID-19 Pandemic only served to highlight that the Highlands Surgery is already working at or above capacity. The additional impact of the various large scale residential developments recently delivered and currently underway along Steppingley Road (Red Kite Senior Living complex, planned Senior Bungalows adjacent to Red Kite Senior Living Complex, planned Social Housing behind Red Kite Senior Living Complex near the Allotments, under construction apartments on James Place and Saxon Woods) on the surgery has yet to be fully realised but is anticipated to exacerbate an already difficult and unacceptable situation. Pressures on the surgery from new and planned residential development in Westoning also need to be factored in. The provision of a new GP surgery, NHS health centre or walk-in clinic must be provided before any further large scale residential development of Flitwick or the surrounding villages that it would serve is contemplated.
- **Education infrastructure** – Pressures on the existing middle and upper schools in Flitwick and Ampthill, and on CBC's SEND education budget, are likely to be significantly reduced by building a new, dedicated alternative provision school in either Flitwick or Ampthill for SEND pupils in Years 5-11. It is widely accepted that the numbers of pupils with SEND needs is increasing nationally and that current provision is inadequate. The existing provision within CBC's area is located at either end of the unitary area with nothing provided in the central area. The existing provision is also focussed on those with learning difficulties; there is currently nothing in the CBC area for SEND pupils who are academically able but are struggling to access mainstream school on SEMH grounds. Building a new alternative provision school will support the area's most vulnerable young residents and bolster and support the current offering in the local mainstream middle and upper schools.
- **Affordable Housing** – in the event more residential development must be accommodated in Flitwick, the Council wishes to see that sites deliver over 50% affordable housing to address the need for such housing locally.
- **Cumulative impact of other large-scale development on Flitwick** – the cumulative impact of the large scale elsewhere in Central Bedfordshire and Bedford Borough on

Flitwick must be addressed as part of the Strategic Impact Assessment to be conducted in conjunction with the emerging new local plan. This includes major residential developments already delivered and planned in Harlington and Marston Vale new village and the impact the delivery of Universal Studios UK will have.

- **Surface water drainage, sewer capacity and sewage treatment facilities** – recent issues with the need to replace sewers in the Steppingley Road area have highlighted concerns with sewer capacity and the age of the current sewer network and the impact new development has had on this. Further, the recent surface water flooding in the High Street and Ampthill Road areas of Flitwick has highlighted concerns regarding the adequacy of current surface water drainage and the impact development has had on removing natural attenuation measures. It is not known what additional capacity is available at the nearby sewage treatment works to accommodate any further new development. Any planned new large scale residential development in Flitwick must be required to demonstrate adequate surface water attenuation measures to prevent flooding and to contribute to the need to upgrade existing sewers and the provision of adequate sewage treatment facilities.
- **Parking and sustainable transport** – Resident surveys have consistently identified the lack of parking in the town centre as Flitwick residents' biggest concern. The existing Local Plan commitment to provide a multi-storey station car park has not been delivered. Commuter parking throughout residential areas within walking distance of the station remains an issue. The Council would like to see CBC address this in the local plan whether by the provision of a new car park or via more sustainable transport measures eg improvements to the current bus service, safer walking and cycling routes, the provision of a public bike or electric scooter programme.
- **Town centre and community cohesion** – Flitwick has experienced significant outward expansion, including within the Green Belt, on the north/ northwest boundary without the corresponding investment in its town centre, services or community infrastructure. Any further edge-of-town development must address this and how to ensure there is a relationship between new neighbourhoods and the existing town centre.
- **Green Belt and countryside** – The designation of Green Belt land around Flitwick serves a number of defined purposes. The Council notes that the stage 1 2017 Green Belt assessment that was produced as part of the adopted local plan indicates that the strongest contribution all five parcels of Green Belt around Flitwick make is as regards safeguarding the countryside from encroachment. All five parcels were determined to make weak or no contribution to unrestricted urban sprawl and either weak or no contribution or a relatively weak contribution to preserving the setting and special character of historic towns. FW1 and FW5, which are both to the north of the boundary, are both determined to make a relatively strong contribution to preventing neighbouring towns from merging but nonetheless have seen land released for development in the adopted local plan period (in FW1's case for the Aldi supermarket, for Baycroft care home (which is on a previously developed site) and for Flitwick Football Centre and in FW5's case for Saxon Woods residential development). The Green Belt around Flitwick ensures residents have access to open countryside for leisure purposes including quiet walking routes, preserves wildlife corridors between countryside areas for wildlife and keeps Flitwick visually and physically distinct from Ampthill and the surrounding villages of Westoning, Steppingley and Greenfield. Most of the proposed sites would erode this Green Belt, a significant amount of which is also high-quality Grade 2 agricultural land. This is contrary to the principle of Brownfield First development and could impact

national food security, whilst having the potential to increase coalescence with neighbouring settlements.

- **Environment and wellbeing and biodiversity and nature** – Further development in the Green Belt would result in the loss of much valued green spaces including farmland fringes, scrubland and hedgerows that support and contribute to the diversity and richness of nature and local biodiversity, and which contributes to residents' health and wellbeing. These habitats sustain a range of protected and priority species, including badgers, deer, bats, owls, water voles, insects (including butterflies and moths) and ground-nesting birds, including skylarks (a red list species whose populations are declining in many regions due to habitat loss). Any development in the Green Belt must ensure that existing wildlife corridors linking Flitwick's green spaces to the wider countryside are maintained and new wildlife corridors are provided.
- **Flooding** – Any development must be subject to a flood risk assessment and consider impact on existing surface water drainage system, given the area's high water table and recent flooding events.

The table notes site specific objections.

Site Number	Recommendation / Note	Site Specific Issue
136301 (A5120 adjoining Fir Tree Close – Flitwick Parish):	Object – Residential	This area is essentially a wetland site. It is believed to have a high water table and is unlikely to be suitable for development. The site is in the Green Belt (FW3) and is understood to provide a buffer from flooding for nearby residents. As a result, development here would likely increase flood risk. Access to the site is also difficult as it would need to be obtained from the A5120.
136321 and 136680 (which includes 136321) (2 parcels east of Chauntry Way – Flitwick Parish)	Object – Residential the Council wishes to see designated as Standalone Green Space	The sites are in the Green Belt (part of FW1) and currently comprise scrubland habitat although they are likely to have been arable fields historically. With the exception of a track on the northern boundary of the larger site, there are no designated public footpaths across them but there is clear evidence of them being used regularly for walking as they are criss crossed by paths. They are also believed to be in the floodplain and face significant flooding and drainage constraints. Access to the sites is also understood to be a major constraint; the most suitable safe access route is likely to be via Chauntry Way, which is unlikely to be able to accommodate the extra traffic movements associated with developing either site. The alternative is understood to be a single track access from Ampthill Road. The sites are more ideally suited, together with 136706, to designation as Standalone Green Space, being rich in biodiversity and providing diverse habitats for wildlife and playing a significant role as a connector to surrounding countryside, especially the SSSI at Flitwick Moor. In that context it is noteworthy that the sites are in the Greensand Nature Improvement Area. The sites form a vital and significant wildlife corridor from the urban areas of Flitwick to neighbouring countryside, including the Flitwick Moor SSSI. Flitwick residents value the sites highly for this and also for leisure activities including walking. Development here would cause significant and harmful biodiversity loss and erode the Green Belt buffer separating Flitwick from Ampthill; the stage 1 assessment in the 2017 Green Belt Review notes the area of FW1 makes a relatively strong contribution to preventing neighbouring towns merging. The site's proximity to the existing sewage works is also likely to rule out residential development on amenity grounds. Consideration should also be given in the emerging local plan as to whether the sewage works needs land to be earmarked in case expansion is required to accommodate recent new and future residential developments in Flitwick, Ampthill and the surrounding villages. The Council does not wish to see this area of Flitwick subject to

		development, other than to accommodate any necessary expansion to the existing sewage works.
136706 (Behind Trafalgar Drive and Salisbury Road – Flitwick Parish)	Object – Residential, Other. The Council wishes to see as Standalone Green Space	The site is in Green Belt (FW1). It is designated as agricultural land although has been left fallow for some time and is now established scrubland. Like 136321 and 136680 access to the site and flood risk are also understood to be significant constraints. The site is more ideally suited to designation as Standalone Green Space, together with sites 136321 and 136680, being rich in biodiversity, providing diverse habitats for wildlife and playing a significant role as a connector to surrounding countryside especially the nearby SSSI at Flitwick Moor. In that context it is noteworthy that the site is in the Greensand Nature Improvement Area. The site together with sites 136321 and 136680 forms a vital and significant wildlife corridor from the urban areas of Flitwick to neighbouring countryside, including the Flitwick Moor SSSI. Flitwick residents value the sites highly for this and also for leisure activities including walking. Development here would cause significant and harmful biodiversity loss and erode the Green Belt buffer separating Flitwick from Ampthill - the current Green Belt review notes the area of FW1 makes a relatively strong contribution to preventing neighbouring towns merging. The site's proximity to the sewage works is also likely to rule out residential development on amenity grounds. Consideration should also be given to whether the sewage works needs land to be earmarked in case expansion is required to accommodate recent new and future residential developments in Flitwick, Ampthill and the surrounding villages. Traffic impact on the existing road network is also likely to be a constraint noting any access is likely to be through existing residential developments. The Council does not wish to see this area of Flitwick subject to development, other than to accommodate any necessary expansion to the existing sewage works.
136670 (Maulden Road to Greenfield Road, in front of Flitwick Moor – Flitwick Parish)	Object – Residential, Standalone Green Spaces, Other	Green Belt site (in FW2). The site comprises three actively farmed Grade 2 arable fields of varying sizes and is the foreground to Flitwick Moor SSSI, which is situated along the eastern boundary of the site. The site drains to the River Flit and its tributaries and is in the Greensand Nature Improvement Area. It is part of an important landscape that gives the Flit Valley its identity and offers residents and visitors much cherished countryside views and access to leisure activities including walks (the Flit Valley Walk route runs along the site's southern boundary) and access to nature. Development of this site is not considered to be sustainable; it would represent an inappropriate expansion of Flitwick with poor integration into the

		town's existing infrastructure, is likely to harm the SSSI and its setting in both the development and built phases, increase pressure on an already fragile habitat, and is likely to increase flooding events. The Council does not wish to see this area of Flitwick subject to development.
136553 (Church Road – Flitwick Parish)	Object – Residential	The site is in Green Belt (in FW4). This is a small site immediately adjoining Flitwick Wood, a local nature reserve. It will make little to no contribution to meeting the new housing requirements that Flitwick is likely to be expected to deliver in the local plan period to 2050 and the new infrastructure Flitwick so desperately needs; the loss of Green Belt and extension of the settlement boundary here is not proportionate to any benefit it is likely to deliver. Further the site is not considered to be a sustainable one in any event, being some distance from the centre of Flitwick. Access to the site is also poor, being via Church Road, which is a poorly maintained country road that narrows to a single lane near the site. The site would represent an inappropriate expansion of Flitwick with poor integration into the town's existing infrastructure. The Council does not wish to see this area of Flitwick subject to development.
135343 Steppingley Hospital and Orchid Lawns Care Home	Object for residential	See section 2 above.
136288 (Lindy Lou, Froghall Road next to Steppingley Hospital – Steppingley Parish)	Object	The site is in Green Belt (in FW5, which is notable for the relatively strong contribution it makes from preventing neighbouring towns merging). This is a small site on which there is an existing residential house in substantial grounds. On its own, it will make little to no contribution to meeting the new housing requirements that Flitwick is likely to be expected to deliver in the local plan period to 2050 and the new infrastructure Flitwick so desperately needs; the loss of Green Belt and extension of the settlement boundary here is not proportionate to any benefit it is likely to deliver. Further the site is not considered to be a sustainable one in any event, being some distance from the centre of Flitwick. Access to the site is also poor, being via Froghall Road which is a poorly maintained country road that which narrows to a single lane at various points. The site would represent an inappropriate expansion of Flitwick with poor integration into the town's existing infrastructure. There would also be concerns about the amenity of future residents given the site's close proximity to the new crematorium.
136506 Froghall Farm	Object	The site is in Green Belt (in FW5, which is notable for the relatively strong contribution it makes from

and surrounding arable fields		preventing neighbouring towns merging). Part of the site, namely the farmhouse and surrounding farmyard and outbuildings, is already developed land in the Green Belt (as part of FW5) and could find itself redefined as Grey Belt in the forthcoming review. The remainder is actively farmed Grade 2 agricultural land in arable use, which is understood to be within a floodplain, flooding annually. Residential development of the already developed part of the site, in isolation, for residential purposes will make little contribution to meeting the new housing requirements that Flitwick is likely to be expected to deliver in the local plan period to 2050; the loss of Green Belt and extension of the settlement boundary here is not proportionate to any benefit to delivering housing need that it is likely to deliver. Further, the site is not considered to be a sustainable one, being some distance from the centre of Flitwick. Access to the site is also poor, being via Froghall Road which is a poorly maintained country road that which narrows to a single lane at various points. Residential development of the site generally is not considered to be sustainable especially without the delivery of substantial new public infrastructure, including a GP surgery/ walk in centre or health clinic, as its loss would not outweigh the harm the development would otherwise cause to the Green Belt (especially in terms of closing the gap between the towns of Flitwick and Ampthill), surrounding countryside and existing infrastructure. It would be a significant, inappropriate expansion of Flitwick into Steppingley Parish, integrating poorly with existing infrastructure. It would also place homes in close proximity to the new Crematorium, with the visual and amenity impacts that could have. The site has high visual amenity at present much is much valued by residents and is the foreground to the new public open space created for nature conservation purposes (as part of the Oakfield Gardens Crematorium development). The Council would wish to see retention of the existing hedgerow on Froghall Road in the context of any development to help screen it.
136615 (Kiln Farm, Steppingley Road, – Steppingley Parish)	Object	The site is in Green Belt (in FW4, which is notable for the strong contribution it makes for safeguarding countryside from encroachment). This is a small site on which there is an existing large residential house in substantial grounds. On its own, it will make little to no contribution to meeting the new housing requirements that Flitwick is likely to be expected to

		deliver in the local plan period to 2050 and the new infrastructure Flitwick so desperately needs; the loss of Green Belt, the potential harm to Flitwick Woods, a local nature reserve, as a result of additional recreational pressure, and extension of the settlement boundary here is not proportionate to any benefit it is likely to deliver. Further the site is not considered to be a sustainable one in any event, being some distance from the centre of Flitwick. The site would represent an inappropriate expansion of Flitwick with poor integration into the town's existing infrastructure. The site is also in close proximity to the new Saxon Woods development and is surrounded by arable fields. This area is highly valued by residents of Flitwick for its visual amenity and open rural feel which is diminished by the Saxon Woods development. Further development would compromise the visual amenity of the site and its wider setting further.
136754 and 136807 (136754 being part of 136807) (Behind the new Saxon Woods development, adjacent to Flitwick Wood, Steppingley Road – Steppingley Parish)	Object	The sites are in Green Belt (in FW4, which is notable for the strong contribution it makes for safeguarding countryside from encroachment) and comprise arable farmland which is currently in use. FW4 is though deemed to make a relatively weak contribution to preventing neighbouring towns from merging. Residential development of these sites is not supported, most especially without the delivery of substantial new public infrastructure, as their loss would not outweigh the harm development would otherwise cause to the Green Belt and existing infrastructure and it would represent an inappropriate expansion of Flitwick's settlement boundary. The sites immediately adjoin the new Saxon Woods development and their southeast boundary is with Flitwick Wood, a local nature reserve comprising ancient woodland with high amenity and biodiversity value that is highly regarded by residents and visitors for leisure activities, including walking and access to nature. The sites are known to be breeding habitat for skylarks (a red list species whose populations are declining in many regions due to habitat loss); it is imperative that if these sites are allocated for development that the remaining areas of arable fields around and beyond it are protected from development in the plan period to secure the remaining habitat for breeding/ nesting skylarks. Development of the sites is also anticipated to cause significant harm to Flitwick Wood, a local nature reserve, both during the construction and build periods. Accordingly, appropriate ecological and environmental impact

		assessments to inform the necessary mitigation measures to be taken to avoid this would need to be adopted should the sites be allocated. Existing rights of way across the sites including public footpaths would need to be maintained; it is noted that the historic John Bunyan Trail runs along the edge of the site.
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