

# Toddington Park Consultation Response

## 1. Introduction

### 1.1. Purpose

Comments are based on information available on the website [imptoddingtonpark.co.uk](http://imptoddingtonpark.co.uk) and discussions held with representatives on Friday 24<sup>th</sup> April at Harlington consultation session. These comments are my own, as a Toddington resident, Toddington Parish Path co-ordinator and Chair of the Icknield Way Association.

Personally, I would prefer to retain the arable fields and not be covered in development. However, as with all such similar proposals, I provide comments on the basis that if the development gets approved, then through that development we are able to secure improvements to the local infrastructure to the benefit of local and site users.

## 2. Insufficient Consultation

### 2.1. Venues

The bulk of this development in the Toddington parish, with part on Chalton parish yet the public consultation venue has occurred in Harlington. While I also appreciate Harlington is impacted by this development, the consultation approach has resulted in extremely poor community engagement within Toddington. There should have been meeting venues in Toddington, Harlington and Chalton to ensure proper engagement.

When I challenged this, I was told that no venues were available in Toddington in w/c 20 Apr or 27<sup>th</sup> Apr. There are at least 5 suitable venues in Toddington, so I find this very difficult to believe.

On a positive note, the representatives I spoke to were willing to listen to the points I made, although they were understandably unable to confirm whether changes would be made as a result.

### 2.2. Mailing

It is not clear what the scope of the mailing was. I did not get a mailing, yet others in the village did. Was the mailing to a strict x km radius rather than the whole village? The mailing should have included the whole village as the development impacts the whole area.

### 2.3. Website

At the time the mailing went out the website did not have any detail. It is likely that the mailing was read, then it may have prompted a look at the website, but as nothing was on the website it may have been discarded.

Even at noon, on the day before the consultation session (23<sup>rd</sup> Apr) the website was displaying a message indicating that further information would be posted.

**We're keen to involve the local community in the development of the designs and would welcome your views, ideas and comments on our proposals during our consultation which takes place from 16th April to 6th May 2026.**

As part of our engagement with the local community, we'd like to invite you to attend our in-person consultation events where members of the project team will be able to answer any questions you have.

Both events will be held at **Harlington Parish Hall**, Church Road, Harlington, Dunstable LU5 6LE, on:

- **Friday 24th April** between 2pm and 7pm
- **Saturday 25th April** between 11am and 4pm

During our public consultation there will be multiple opportunities to get in touch and share your feedback, including:

- Filling out the feedback form below.
- Getting in touch with [info@imptoddingtonpark.co.uk](mailto:info@imptoddingtonpark.co.uk)
- Over the phone on 0800 331 7094 (between 9am and 5.30pm, Monday to Friday)
- In writing to FREEPOST: RTBU-HAYY-LCUX, 7 Bayley Street, London, WC1 3HB

**Further detail about the proposals and the technical work which is underway will be available from 23rd April 2026, ahead of our public exhibitions in Harlington on 24th and 25th April. The feedback form below includes some questions that will be informed by this additional material, but you are welcome to complete it at any point during the consultation period.**

## 2.4. Indicative plans

The plans on the website and on the panels at the consultation were incorrect, at least in respect that the solar farm was shown covering the railway. It is not clear what other aspects were incorrect/misleading.

## 2.5. Conclusion

The venue selection has not allowed the community to sufficiently engage in this proposal. The mailing was not sufficient. The website was not fully populated until the day before the consultation (23<sup>rd</sup> Apr), although the website says consultation opened on 16<sup>th</sup> April. The deadline for comments/responses is 6<sup>th</sup> May, which means the consultation is only effectively open from 24<sup>th</sup> Apr to 6<sup>th</sup> May, which includes a bank holiday – 7 working days. This is inadequate for many organisations to consider, digest and respond.

## 3. Public Rights of Way (PRoW)

### 3.1. Bridleway beside railway (TOD56 & CHL15)

This an existing footpath (FP) that links two existing bridleways. It has been an aspiration to upgrade this to bridleway (BW) for many years. TOD56 is in land owned by Central Beds Council (CBC), when the former landfill access road was removed CBC used some of the aggregate with a membrane to make the route a well surfaced route for walkers and riders in anticipation of upgrade to bridleway.

The section in Chalton parish (CHL15) runs between and under pylons beside what is proposed as a solar farm. Due to the requirement to provide access for Network Rail to the railway fencing and to UKPN for the pylons a wide corridor will have to be retained. This grassed corridor will enable an excellent grassed bridleway to be created over the footpath. This will provide a vital missing riding route link for the Icknield Way Trail.

### **3.2. Corridor for BW through site (TOD41 & TOD96)**

The BW runs from the B530 down the MSA service road, over the motorway, past Old Park farm and across the proposed development to join with TOD56 and pass under the railway.

The route forms part of the route of the Icknield Way walkers and Icknield Way riders long distance corridor. The actual promoted route here is complicated due to the inability for riders to legally use TOD56/CHL15. If TOD56/CHL15 was formally upgraded to BW, then the Icknield Way Riders route would be realigned along that corridor. The “Toddington Alternative Icknield Way” walking route would remain on this alignment.

The Icknield Way Association would appreciate the funding of information boards about the Icknield Way on the site.

It is understood that CBC have asked, and the developers have agreed, for the part of the width of the bridleway surface to include Flexipave [www.kbiuk.co.uk/flexipave](http://www.kbiuk.co.uk/flexipave), which is welcomed. Although it is proposed to realign the route, it should remain within a ‘green corridor’ and relatively level.

### **3.3. Corridor for FP through site (TOD54 & HAR3)**

This footpath runs from a junction with the bridleway and directly across the fields to Harlington. This is a direct route to Harlington village and station. Currently the path goes high and drops rapidly into a former quarry just to the east of the proposed development.

I understand it is proposed to reduce the height of the hill and to upgrade this footpath to bridleway so that it forms a riding (particularly cycling) route to Harlington. This will require agreement with other landowners but will provide a useful enhancement to the local riding provision.

If it is not possible, or as an addition, it is an aspiration to see HAR23 on the east side of the railway upgraded to BW. Some years ago, a Toddington multi-access forum set out our aspirations, see TMAF page.

### **3.4. Equestrian Facilities**

At the proposed car parking by the mobility hub to the east of Old Park farm, it would be great to make provision for horse box parking. This would be an excellent location to ride to Sharpenhoe Clappers and further on to Ickleford along the Icknield Way Trail. It would similarly be a good starting point for off-road cyclists and walkers. This location will be supervised by the mobility hub café to limit any potential anti-social behaviour.

### **3.5. Construction phase**

During the construction phase would anticipate there will need to be some adjustments to the route of the PRoWs, however, would expect all routes to remain open and usable throughout the construction phase. To achieve this, it may be necessary to temporarily realign the PRoW across/around the site as work progresses.

This continuity is particularly important for a long distance route such as the Icknield Way, where users are not aware/familiar with any local closures.

### **3.6. Use of the MSA Service road**

The government published guidance (see para 91) has been that Motorway Service Areas (MSA) states:

91. The suitability of connections to roadside facilities from the local road network will be considered on a case-by-case basis by the relevant local planning authority as part of the planning process. However, there must be no route through a roadside facility or its access link between the local road network and the SRN. In addition, any subsidiary accesses must be restricted to staff, deliveries, parties carrying out duties

for and on behalf of the Secretary of State, the company, the emergency services, and breakdown recovery and assistance.

The MSA service road has “subsidiary access” onto the B530. But the private road is also a bridleway (TOD41), so the volume of traffic has safety implications on walkers and riders from the B530, over the M1 bridge to the junction with the Old Park farm access. This non-motorised user activity will be increased by the provision of public access green space.

Historically, the north and south service road use was controlled by barriers from the MSA, which I believe have not been maintained. As a result, when the M1 carriageway is disrupted the service road suffers a considerable increase in traffic.

Moto, as a joint promoter of this scheme and current site operator, should reinstate the barrier control of the service roads to ensure compliance with the government guidance by only allowing the authorised vehicles. This should be mandated/enforced through a planning obligation by CBC on the development.

### **3.7. 999 Access to site**

As the development only has a single access at J12 onto the A5120 it is proposed to have two emergency 999 access gates. One adjacent to Old Park farm on the bridleway (TOD41) and one to the back of the MSA. These have been described as normally locked gates that will be opened in an emergency, who and how they will be unlocked is not clear.

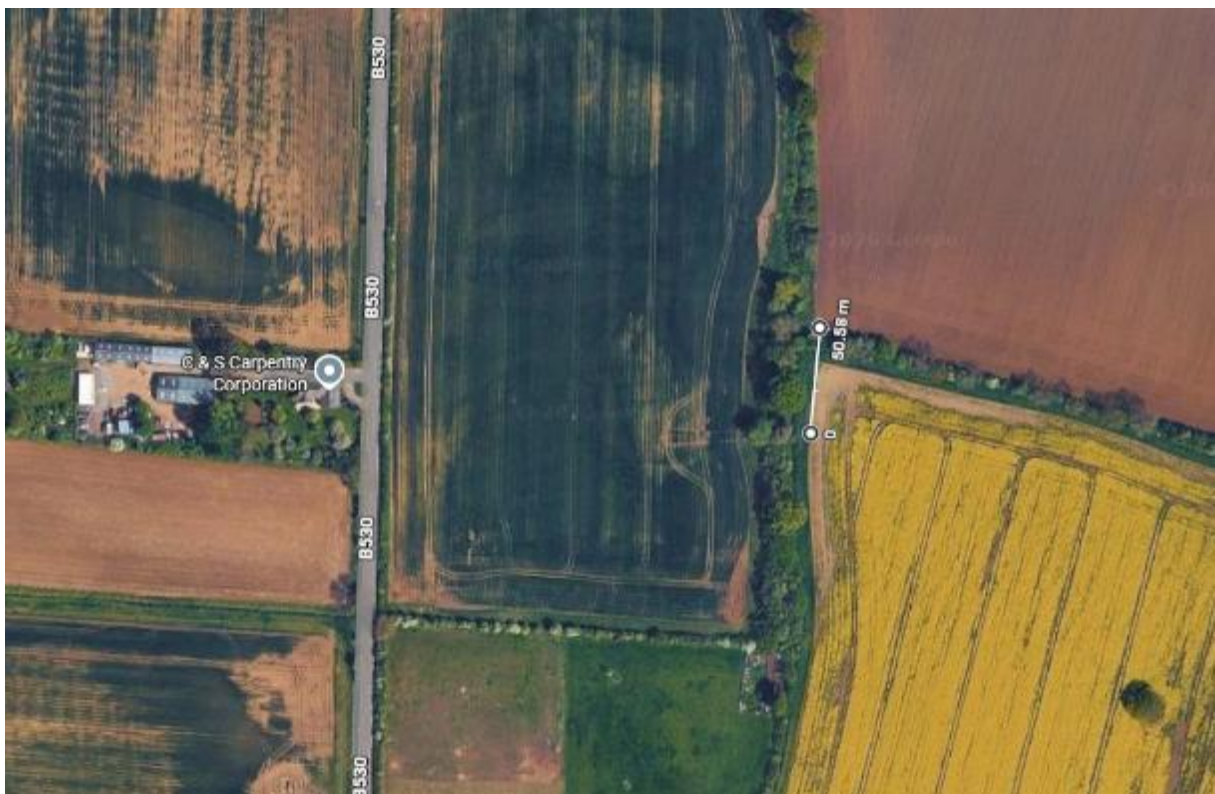
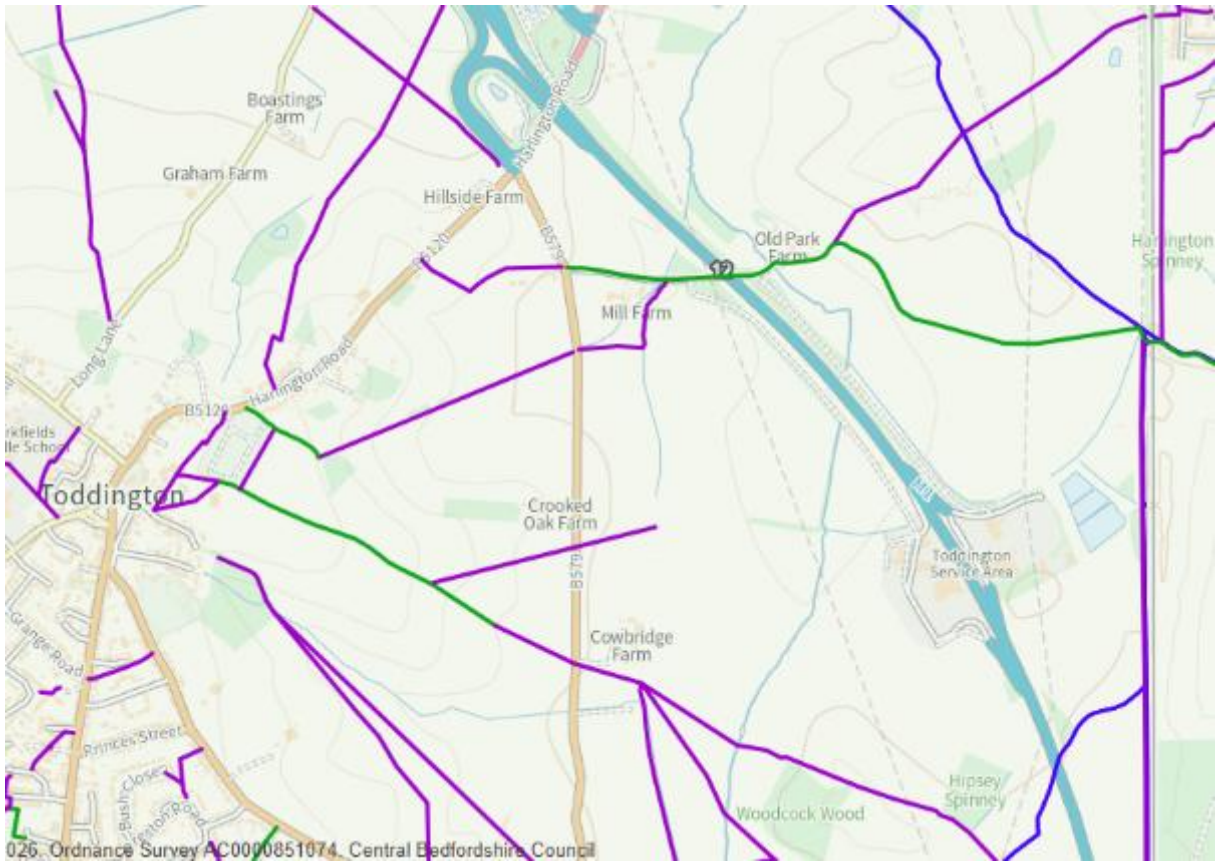
At the consultation, I was assured that these would only be used by 999 staff during an emergency that may block the single access – such as a vehicle fire on the junction. They assured me that they would *not* be used by cars or lorries trapped on site by the emergency. This is important to ensure the safety of walkers and riders using the bridleway.

Also see comments on use of MSA service road.

### **3.8. Footpath link between TOD44 & TOD54**

TOD44 is currently a dead-end footpath that terminates about 50m south of the proposed green space allocation. If the footpath was linked between TOD44 & TOD54 it would enable a circular walking route from Toddington, see the extract of the definitive map, on TOD54 past Crooked Oak farm, then north and return on TOD44 past Mill farm. This would be ideal for dog walkers and the popular village Wellbeing Walks.

There are two different landowners who would be able to facilitate the ~50m missing link, one on each side of the hedge as shown below, plus the developer who can dedicate the remaining section to join TOD44.



## 4. Highways

### 4.1. Additional Traffic

With additional traffic generated by this development the following cycleways need to be created and extended to:

- Ensure safe sustainable riding routes when there is additional traffic created by the development
- Create the longstanding ambition to link Toddington and Harlington via a safe sustainable walking and riding route for:
  - Employees from Toddington to access the development for employment
  - Employees from Toddington and Harlington to access the Motorway Service Area for employment
  - Toddington commuters to access the station
  - Teenage children to be able to get to/from school and to meet friends socially. Harlington children attend the Middle school in Toddington, and Toddington children attend the Upper school in Harlington.

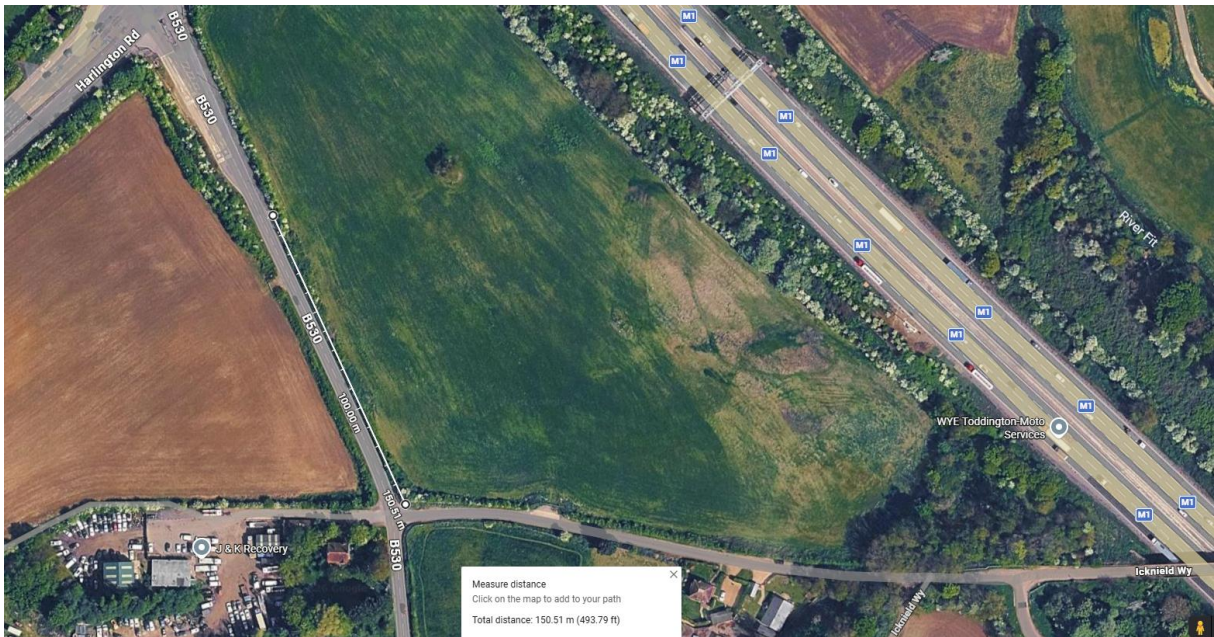
The traffic through the villages of Toddington, Harlington and Chalton will all increase due to the development. Mitigation should be created. The current weight limit constraint is subject to exemption when the M1 is blocked, which occurs frequently. This development will push yet more traffic onto our already busy roads.

#### 4.2. Cycleway along roadside (B579)

Running south from the A5120 at J12 is the road known as Fancott Bridleway (B530). This has the footway and cycleway constructed for the extent of the J12 National Highways scope of works. <https://w3w.co/excellent.lump.highlighted>.

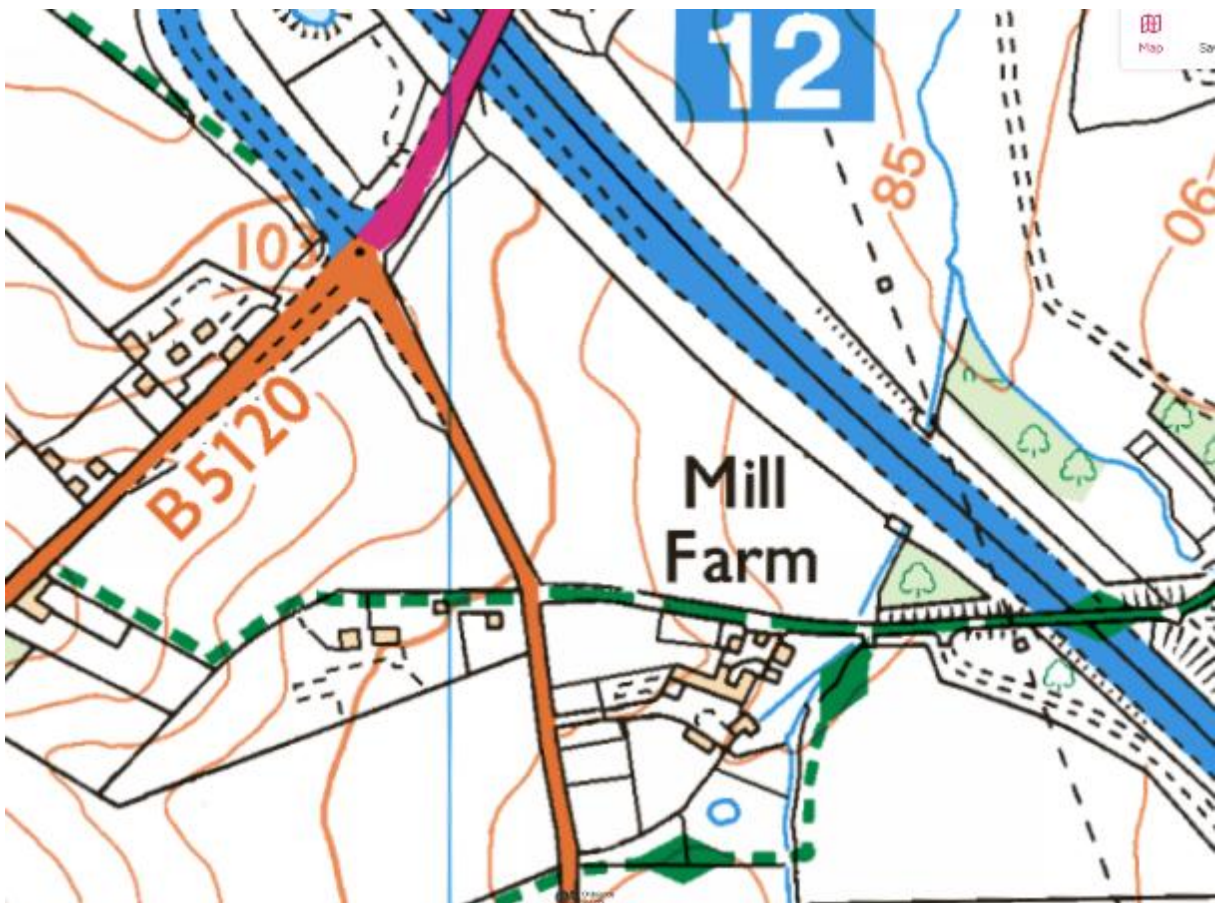


The cycleway should be extended about 150m further south to join with the MSA access road which is a bridleway (TOD41) <https://w3w.co/grinning.many.lousy> This would allow pedestrian and cycle access from Toddington village to the green space on the west of the motorway and access to the development past Old Park farm.



The 40mph limit should be extended from the current location, further south of the MSA access route and the crossing point of the Icknield Way path on (TOD41).

<https://w3w.co/photocopy.coughed.curtains>



#### 4.3. Cycleway towards Harlington village (A5120)

It has been a long standing ambition for the cycleway from J12 to be extended toward Harlington. The 350m section between J12 and the roundabout has an existing wide highway verge which should make it relatively easy.

From the roundabout along Toddington road towards Harlington station the road is narrower without an easily usable verge but the recent housing development near the station has created a new roadside cycleway and toucan crossing.

There is another development proposed from the A5120 roundabout which, if they progressed, would complete this cycleway from the roundabout. If that development does not proceed, then this proposed development should make these improvements.

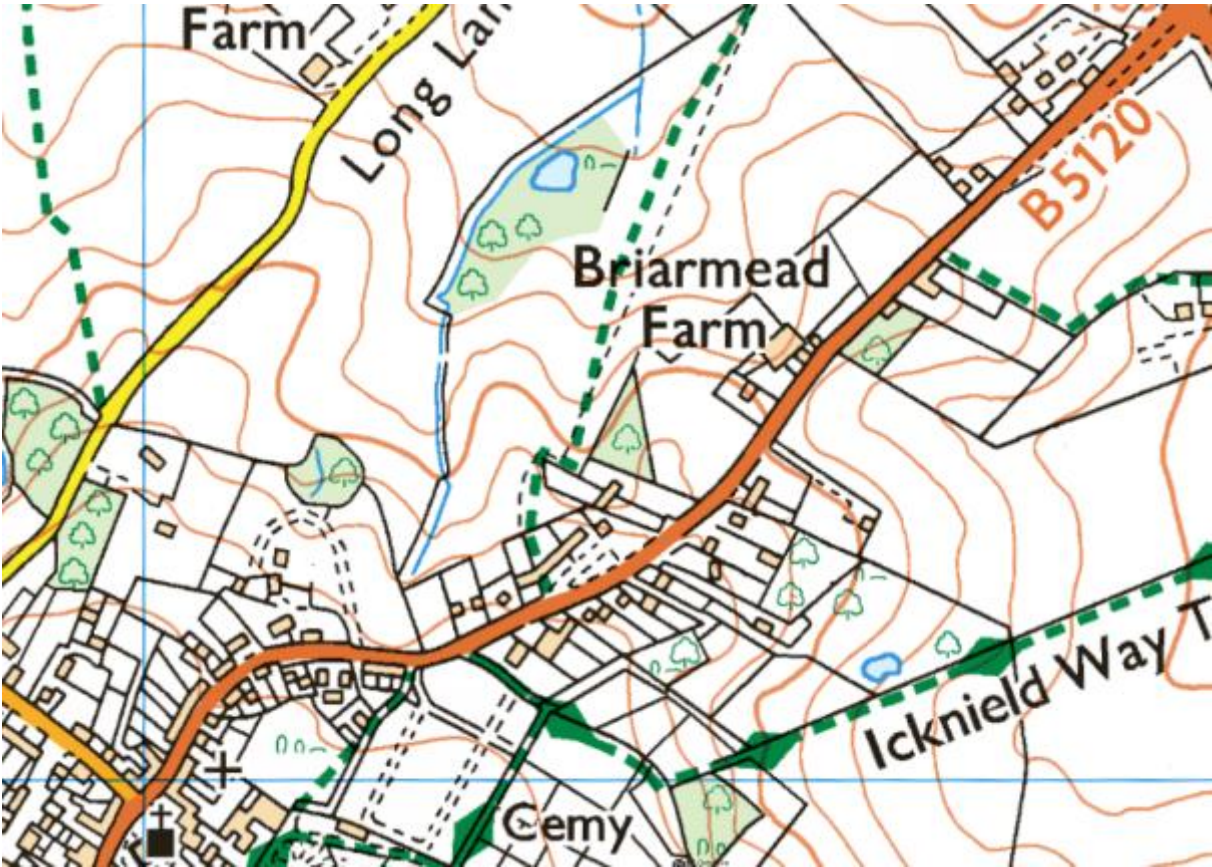


**4.4. Cycleway towards Toddington village (B5120)**

The B5120 J12 cycleway ends and turns into a footway. At some points the existing footway and highway verge is wide enough to accommodate a cycleway, although other sections are bounded by embankments. To negate the additional traffic coming through Toddington

village on the B5120 the provision of a cycleway from the extent of the J12 cycleway to the village centre should be provided.

Not only will this provide safety to existing villagers, but it will also provide a sustainable mode of transport to the development workforce.



**4.5. Single Highway Access**

When J12 was redesigned, there was considerable modelling of traffic flows. My memory was that the proposed exit was unable to cope with any volume without causing congestion to the other routes using the junction.

The former junction design resulted in considerable traffic queues on all the roads, including the slips roads back onto the M1 main carriage way. That was on good days, on bad days it was chaotic. The current design has largely resolved that bottleneck except when there is congestion on the M1

The single access also has the risk of incidents blocking that access. See comments elsewhere on 999 access.

The development of the site as a data centre, rather than warehousing, would significantly reduce the traffic volumes and the impact the development would incur/cause during M1 congestion. The proximity to Sundon Grid also supports the development of data centres with a high power need.

**4.6. MSA not a destination**

The government published guidance (see para 92) has been that Motorway Service Areas (MSA) are *not a destination* and should not increase traffic movements to/from MSAs. It is not clear if the proposed HGV parking is formally an extension of the MSA and therefore subject to all the government obligations of opening hours, 2hr free parking, change of land ownership (to government), etc. Or whether this is regarded as commercially owned venture, in which case it would be regarded as a “destination” accessed from the MSA under the guidance.

## **5. Green Area**

### **5.1. Green space on west of the motorway**

There is no parking provision at the green space. It is understood this is due to the proximity of houses and the concern about anti-social behaviour, etc. leading to a significant maintenance and management obligation. I have some sympathy with these views.

Access is proposed solely from bridleways and footpaths. However, this arrangement will result in a temptation for visitors to park on the motorway service access road, or even the B530. This will obstruct legitimate vehicle users, see Use of MSA access road. Parking will reduce the safety of walkers and riders legitimately using the bridleway. There do not appear to be any proposals on how to prevent this parking on this private road.

Provision of visitor parking at the mobility hub proposed to the east of Old Park farm would provide parking in way that can be managed and overseen. There would be a short walk along the bridleway (MSA access road) over the motorway to the green space. See Use of the MSA Service road, 999 Access to site and Equestrian Facilities.

The circular walking access should also be improved by the linking the two footpaths as described in Footpath link of TOD44 & TOD54.

### **5.2. Ongoing maintenance of the site**

The Green area and the proposed green corridors, paths, hedgerows, trees will all require ongoing maintenance. At the consultation session I was told that a site a management company will be established. However, it is not clear to what standard this green area and green corridors will be maintained. So, some enduring lifelong commercial assurance with CBC (and/or parish councils) should be put place to ensure these areas are maintained to agreed standards for generations to come.

In the same way, the area of green space must be legally guaranteed to remain as green space. Possibly legally creating it as a village green.

### **5.3. Community foundation**

There is discussion of a Community Foundation. At the consultation session this was described as a one-off fund of ~£200k which would be distributed locally. I expressed my view that this was a small sum compared to some recent S106 figures for housing developments in the village.

My own view would be that it might be nice to see an annual sum over the next 25 years rather than a one off sum. Assuming it can be legally assured in some way.

## **6. Water**

### **6.1. Ground Water**

It appears to be proposed to take the top of the hill and place the material from the hill on the east of the site by the railway. With a desire to visually screen the site from views from the Chiltern National Landscape at Sundon and Sharpenhoe Clappers.

Toddington is a historic community on the top of a hill. It has active springs throughout the year at the top of the hill (on the high street feeding the pond, Dropshot Marsh, etc.). The woodland adjacent to the site, known as Toddington Borehole, was apparently where a borehole was dug but it was dry and therefore abandoned. The ground around this area is extremely varied with clay, sand and chalk. I would strongly suggest that the developers do serious ground investigations to ensure they do not disturb the ground water such that removing the hill results in the existing Toddington springs emerging at the development. If

the springs in the village ran dry it would have serious consequences for the ecology around the village.

## **6.2. Flood Plain**

The river Flit flood plain will affect parts of the site, so development should ensure that flooding can safely occur without adversely affecting properties downstream. If necessary, flood prevention works may require landowner agreement further up-stream. For example, the Anglian Water waste water treatment works have ponds which have not been dredged for many years, thereby reducing their storage capability.

## **6.3. Pollution of river**

Depending on the use of the site (particularly the HGV park) there is the risk of diesel and other pollutants discharging into the River Flit. Mitigation should be put in place to ensure that is prevented.

## **6.4. Sewage**

I understand the Moto MSA sewage currently is pumped to the Cowbridge sewage holding tank <https://w3w.co/bland.breaches.brick>. This tank receives all the sewage from Toddington village and pumps it to Chalton waste water treatment works. The Cowbridge site regularly discharges storm overflow directly into the river Flit. As a result, it has no further capacity without additional storage tanks and additional pressurised pipework to the Chalton works. The entry to Chalton WTW is at the south of the site. Otherwise, provision for treating sewage and discharging in the reiver Flit will have to be made within the development. See foul water on [Toddington.Info](#)

Tom Chevalier

3<sup>rd</sup> May 2026