

5. Don't Know

6. No - tick them all

6a To which part of the Bedford Borough Local Plan 2030 does this representation relate?

Paragraph vii Policy 2S.Strategic residential development in key service centres with expanded education provision where necessary

Policy 3S. Amount and distribution of housing development. Allocation of 2000 dwellings to Key Service Centres and allocation of 500 homes to Sharnbrook.

Please explain your answer to question 6. Please be as precise as possible.

1.0 BACKGROUND

The Parish Council has been asked to comment on iterations of the draft Bedford Borough Local Plan in

- a. 2015 when an allocation of 100 dwellings was proposed for Sharnbrook;
- b. 2017 when an allocation of either 100 dwellings or 600 dwellings was proposed for Sharnbrook;
- c. January 2018 when an allocation of no dwellings was proposed for Sharnbrook; and
- d. October 2018 when an allocation of 500 dwellings is proposed for Sharnbrook.

Attention should be drawn to 'b', our detailed response to the Local Plan 2035 Consultation June 2017 (which is resubmitted here for ease of reference). Many of the comments made then are relevant to the **soundness** of the current policy proposals and our response also helps set the context to our comments now which are made in the light of further evidence. That response demonstrates that the Parish Council is able to take a measured view of proposals relating to planning policy. At the very least, however, the wide fluctuation in policy proposals relating to Sharnbrook presented in such a short time is indicative of policy making that lacks coherence or consistency. The latest should therefore attract detailed critical scrutiny, supported by proper evidence, to decide whether the proposals are justified and effective.

We are limiting our comments to Policies insofar as they relate to the allocation of 500 dwellings to Sharnbrook.

2.0 SHARNBROOK AS A KEY SERVICE CENTRE

2.1 The Scoring Methodology

The allocation of 500 dwellings to Sharnbrook results from its designation as a Key Service Centre by Bedford Borough Council. The Local Plan 2030 Settlement Hierarchy applies a points-based methodology for ranking settlements based on the accessibility and availability of **key facilities** on a given date (in this case in 2014). The underlying assumption is that existence of a certain number of facilities on the date of the snapshot means that a settlement is capable of supporting incremental development of 500 dwellings. However, the scoring methodology **does not** consider any of the following:

- The size of the existing settlement; the proportion of development proposed in relation to the size of the existing settlement; and the **capacity** of the existing settlement to integrate development of the level proposed.

- Takes no account of the quality or fitness for purpose of the facilities scored, disregards some key facilities and in particular makes no assessment of the **capacity of the facilities scored to support further development**.
- Takes no account of geography, access and **infrastructure** constraining development potential.

The methodology is applied simply to give rise to an assumption that if a settlement benefits from certain facilities then, whatever their quality, size and whatever the capacity of the settlement to support further development, that settlement is capable of viably delivering and subsequently integrating development of a particular level (in this case 500 houses which is a figure thought to support a new school but which disregards any costed allowance for provision of additional local infrastructure).

No further filter is applied to take account of other local factors that will impact upon the viability and deliverability of development at the level proposed. In the absence of any evidence or analysis of local factors, it cannot be assumed that development of the level proposed is deliverable in Sharnbrook. In particular, the methodology means the proposal for Sharnbrook has not been considered against reasonable alternative strategies, based on proportionate evidence. It focuses simply on the availability of a limited category of facilities and ignores all other infrastructure considerations.

2.2 Existing Facilities in Sharnbrook at Capacity

In the case of Sharnbrook, there are (amongst other issues):

- a. A doctor's surgery, which is already at (or beyond) capacity. The surgery has said that it will not be able to function in the face of an increase in the Village population.
- b. Two general stores (one including a small sub post office and one scored on the basis it is a supermarket). Both are constrained by their size and location. They are situated in period buildings, (one of which is Grade 2 listed and both are in the Conservation area); suffer from a lack of on-site storage; have to accept their deliveries from lorries which are of necessity parked on the main road through the village, at pinchpoints in the High Street; and which have no parking facilities for customers. These shops are at capacity and without scope either for expansion, improving delivery arrangements, increasing frequency of deliveries or creation of significant additional storage. They can not support further development (which is evidenced by a letter from the manager of the Co-Operative store attached as Appendix 1 to the Parish Council's response to the June 2017 consultation).
- c. A primary school, which is at capacity and is also located on the High Street, with no expansion possibilities and accessibility problems (detailed more in point 3.2).
- d. A very large secondary school which is also at capacity, and located at the far end of the village, meaning that the majority of traffic travels through the entire village. This includes buses turning at an extremely tight pinch point on the High Street (see Parish Council's response to the June 2017 consultation for more details on this area). No mention is made of funding to increase capacity at the secondary school, if, indeed, this were possible. The school has recently changed from being an Upper School (13-18 yrs) to being a Secondary School (11-18 years), and has had to increase classrooms accordingly. It is not known if there is further scope for expansion, and furthermore, the traffic issues that this small increase has caused, both within the village and in the immediate vicinity, have been significant. A further increase in numbers would not be welcomed by residents due to this factor alone.

Designation based simply on existence of facilities takes no account either of the ability of those facilities to support further **development**, or the impact of further development on facilities. It also, as discussed further below, makes no assessment of **infrastructure** requirements to deliver

development at the level proposed. Instead it relies on an assumption, which is not supported by evidence, that development at the level suggested will be sufficient to support all infrastructure improvements required, whatever the extent of those improvements.

Put into context, building a further 500 dwellings in Sharnbrook will result in, at the very least, relocation of the primary school away from the centre of the village; relocation or loss of the doctors' surgery; and likely relocation of the Village's main shop away from the middle of the village. The continuing existence of other facilities will be threatened by the radical alteration of the village's epicentre and the focus of the Village and its community will be permanently altered.

2.3 Planning Policy Not Met

The policies, insofar as they relate to Sharnbrook:

- Do not promote sustainable development as required by National Planning Policy Framework 2012 Paragraph 28 which requires development to **promote the retention** of local services and community facilities
- Will result in the loss or radical relocation of existing facilities contrary to National Planning Policy Framework 2012 Paragraph 70 which requires that established shops, facilities and services are able to **develop** and **modernise** in a way that is sustainable, and are **retained** for the benefit of the community.
- Do not represent the most appropriate strategy, when considered against reasonable alternatives, based on **proportionate evidence** as required by National Planning Policy Framework 2012 Paragraph 182.
- Have not been prepared to meet **objectively assessed** infrastructure requirements as required by National Planning Policy Framework 2012 Paragraph 182.

The Local Plan 2030, insofar as it relates to Sharnbrook, fails all four of the tests of soundness. It is neither **positively prepared**, **justified**, **effective**, nor **consistent with national policy**.

It is not **sound**.

3.0 THE EVIDENCE BASE

Allocation of development based on Key Service Centre status of itself makes no allowance for physical constraints or infrastructure enhancements required. Assessment of those factors is also required to provide evidence of the deliverability of development at the level proposed. Self evidently, requirements will vary from settlement to settlement depending on their current size, locations, topography and capacity of existing infrastructure. It cannot be assumed that 500 dwellings will be capable of delivery and assimilation in each case.

For some settlements, development of an incremental 500 dwellings will represent a relatively modest increase in the size of the settlement and therefore might be expected to require relatively modest additional infrastructure. Bromham, for example, is projected to increase in size by about 24% while Clapham is projected to grow by around 30%. By contrast, Sharnbrook would be projected to grow by around 54%.

A one size fits all approach to allocation based on Key Service Centre status does not of itself provide any evidence supporting deliverability and does not result from a strategy which is based on objectively assessed infrastructure requirements. The evidence provided to support the deliverability of the policies relating to Sharnbrook should therefore be separately assessed.

However, evidence demonstrating objective assessment of the policies is absent (as detailed in the following points).

3.1. NO HIGHWAY ANALYSIS

No highway analysis has been conducted on the impact of an additional 500 dwellings on Sharnbrook. The Bedford Local Plan 2030 Cumulative Modelling conducted by Systra states “the traffic modelling conducted can be used to assess the impact trips from [Sharnbrook] may have on traffic within the Bedford area itself. However, it should not be used to inform the impact on [local traffic within Sharnbrook]”. Of itself, the absence of any highway analysis means it is impossible to demonstrate that the plan has been positively prepared. Equally, if requirements have not been assessed and identified, it cannot be demonstrated that a plan is deliverable.

In the absence of any evidence to support the proposition that development at the level suggested is deliverable from a highways perspective, attention should also be drawn to the following points:

- At the time of the 2001 Census there were 778 households recorded in Sharnbrook. The 2011 Census indicated that there were 927 households in Sharnbrook. That represents a growth of 19 per cent since 2001. A further 23 houses have been added since 2011. Disregarding development between 2011 and 2018, the addition of a further 500 dwellings will represent an increase of 83 per cent in the size of the Village since 2001.
- The Village is located away from main roads. None of the development since 2001 has resulted in the provision of new routes into or out of the Village.
- The highway system in the Village experiences severe congestion at certain times of day making it extremely difficult to use the main access route through the Village (the High Street) or to access the shops and other facilities at those times.
- The physical constraints affecting the Village (including the location of the Conservation Area, Listed Buildings and the River Great Ouse) make it impossible for practical purposes to improve the situation as any solution would involve by passing the centre of the Village.
- Significant additional housing will take the position beyond saturation point.
- In addition, there is no evidence that account has been taken of a large development of 2,500 dwellings with associated business and educational requirements for which planning consent has been approved by East Northamptonshire Council. The site is only some 5 miles north of Sharnbrook, on the A6 and will inevitably generate a considerable increase in traffic towards Bedford.

The absence of highway analysis evidencing the deliverability of the proposed policies of itself renders them unsound. Furthermore, it is apparent that even if a highway analysis **had** been conducted, that evidence **would not support** the Policies.

3.2. NO ASSESSMENT HAS BEEN CONDUCTED TO ASSESS THE IMPACT OF DEVELOPMENT OF THE LEVEL SUGGESTED ON THE OTHER INFRASTRUCTURE OF THE VILLAGE:

Policy 34 of the Draft Plan for Submission requires that development proposals should “ensure that they do not have a harmful impact (including cumulative impact with other development) on the adequacy of existing infrastructure, for example on utilities, schools, health and community facilities.” Developers must implement or contribute towards measures to mitigate adverse impacts.

Without an assessment, there is no evidence to support a proposition that development at the level suggested in the policies is deliverable.

In the absence of evidence demonstrating that development of the level proposed would meet the requirements of policy 34, attention should be drawn to the following points:

- Sharnbrook is a settlement comprising 927 households in 2011. An increase of 500 households represents a 54 per cent increase in the size of the Village. As mentioned above, no assessment has been made of the cost of highway improvements required to support that level of development (nor whether they are practically possible or deliverable)
- Equally, no assessment has been made of the infrastructure improvements required to support a 54% increase in the number of households in the village. The Parish Council has no reliable information on gas or electricity capacity. However, the foul drainage system in the village is already at its capacity. The topography of the village makes it at best extremely difficult and at worst impossible to upgrade the existing systems and no evidence has been provided to confirm that an upgrade to the existing system to increase capacity by 54% or more is either financially viable or practically possible.
- Only anecdotal evidence is provided to support the assumption that 500 dwellings will be sufficient to support the provision of a new primary school. The figure appears to be based on an assertion contained in a consultation on one of the previous iterations of the Local Plan - in this case the 2032 consultation in Autumn 2015. (Comments from officers have also suggested they may believe that 300 dwellings is sufficient to support a new school which is certainly not supported by any evidence provided. Figures used in other parts of the country are significantly higher than 500).
- By contrast, evidence **has** been provided to confirm that the single form entry primary school in the Village has no space for expansion. So any material additional dwellings will require the provision of a new primary school. The existing school will therefore close and the village will require provision of a new two-form entry primary school. As conceded in Education Implications for Local Plan 2030, the requirement to provide a two-form entry primary school from a development of 500 dwellings creates an immediate funding gap as 500 dwellings is, on any analysis, insufficient to support a new two-form entry school. Using Bedford Borough Council's Education Implications for Local Plan 2030 figures, if £4-4.5 million is required to generate a new single-entry school and £6-7 million is required to generate a new two-form entry school, an immediate deficit of up to £3 million calls into question the deliverability of development. However, we have current evidence that a two-form entry school will require in the region of £8-9 million and the deficit could be £5 million.
- At least £1.5 million would be required to relocate the doctor's surgery (if it is not lost completely).
- No evidence has been provided to confirm that other facilities in the Village can support the level of development required. The evidence is in fact to the contrary - by way of example comments from the Co-operative store in Sharnbrook (dating from 2017 can be found at in Appendix 1 at the end of our original submission, attached).

No evidence has been provided to demonstrate the deliverability of development at the level proposed in Sharnbrook. It is clear that a new two-form entry primary school would be required and that the development proposed would (at best) financially only support a single-form entry school. The village will also require a wholesale upgrade to its drainage and other infrastructure, which is already at capacity. Upgrades have not been considered so are by definition uncoded and may not be physically capable of delivery. Highways impact requirements have not been assessed so are by definition uncoded and material improvement within the village highway infrastructure is certainly incapable of delivery.

There is no evidence to support the viable delivery of development at the level proposed. In fact, it seems that little or no evidence has even been collected or assessed. National Planning Policy Framework paragraph 182 requires that the Local Plan is positively prepared based on a strategy, which seeks to meet objectively, assessed development and infrastructure requirements. There has been no attempt to assess infrastructure requirements in the context of the proposals relating to Sharnbrook.

The evidence base does not show that The Local Plan 2030, insofar as it relates to Sharnbrook, has been **positively prepared**, is **justified**, **effective** or **consistent with national policy**.

Again, all four tests of soundness have been failed. The Local Plan 2030, insofar as it relates to Sharnbrook, is not **sound**.

7. Changes to the Local Plan 2030

The allocation of 500 dwellings to Sharnbrook should be removed.

It is not for the Parish Council to suggest alternative allocations elsewhere within Bedford Borough.

8. Yes

The proposed policies insofar as they relate to Sharnbrook have been subject to huge changes in short space of time. It is apparent that, at the very least, the Policies have not been subject to the same level of objective consideration or scrutiny as other parts of the Local Plan. The Policies are not supported by objective evidence and the methodology applied to the production of the Local Plan does not result in full independent assessment based on the characteristics of individual areas, which have been overlooked. We would like to address these concerns at the hearing.

Sharnbrook Parish Council's Response to the Bedford Borough Council Local Plan 2035 Consultation June 2017

- 1. Do you agree that one or more of the four new settlement proposals should form part of the development strategy? If not, the 2,200 dwellings identified for new settlement(s) as part of the preferred strategy will need to be provided elsewhere: where should the development go instead?**

YES. We agree that the clear priority of the new Local Plan should be to meet the Borough's development requirements through strategically located new settlements. The use of new settlements allows an opportunity to plan sustainably and to provide for integrated infrastructure including roads, public transport and school facilities. Prioritising new settlements will help to minimise the impact of further development on the infrastructure, character and amenity of existing settlements.

1.1 STRATEGIC PLANNING FOR THE LONG TERM

Bringing forward a number of new settlements will provide a bedrock for provision of future integrated and sustainable development for the life of the Local Plan 2035 (and beyond). By contrast with the piecemeal approach of focusing on smaller developments, the new settlements present an opportunity for sound long term strategic planning that should not be missed.

The inclusion of at least two and, if viability permits, three of the new settlements in delivering the housing requirements for the Borough up to 2035 (and beyond) is therefore supported and the Parish Council request that the Borough work with the promoters of the sites to investigate the potential of these sites. However, the allocation of these sites should follow the general approach of utilising brownfield sites first.

1.2 ALLOCATING DEVELOPMENT

The suggestion that the potential for development in new settlements would be limited to 2,200 units before 2035 should be re-examined. Two new settlements developed from 2025 onwards by two developers at each site should be capable of generating up to 250 units a year each over 10 years. A target figure of 4000/4500 dwellings in new settlements should be pursued, removing the need to scatter development around the smaller settlements.

- 2. Do you agree that the brownfield site opportunity at Stewartby Brickworks should form part of the preferred development strategy? If not, the 1,000 dwellings proposed at Stewartby Brickworks as part of the preferred strategy will need to be provided elsewhere; where should the development go instead?**

YES. The brownfield opportunity at Stewartby brickworks should form part of the preferred strategy. As a principle, development on brownfield sites should be encouraged before considering greenfield sites, in line with national guidance.

- 3. Do you agree with the principle that all suitable and available sites in and on the edge of the urban area should be allocated? Currently this amounts to 1900 dwellings. If you think that not all of this should be allocated for development where should the development go instead?**

YES. Where they are both suitable and available, sites in and on the edge of the urban area should be allocated. The proviso here is that a full assessment of the suitability of each site should take place taking into account issues of access, sustainability, flood vulnerability, wider infrastructure and amenity value of the site before individual sites are allocated for development.

- 4. Do you agree with the proposed allocation of urban and edge of urban sites listed in table 1 and table 3? Are there any sites which you think should not be allocated or any other sites which you think should be allocated and why?**

YES. Subject to a full assessment of the suitability of each site as described in paragraph 3, the allocation of those sites is generally acceptable.

5. Do you agree with the amount of development identified for the Group 1 Villages as part of the preferred development strategy (2,600 dwellings)? If not, should the amount be higher or lower, what should the number be and how should the strategy change as a result?

NO: THE AMOUNT SHOULD BE LOWER. We fundamentally disagree with the level of development proposed for Group 1 Villages and particularly Sharnbrook. Our reasons and preferred strategy are set out below.

5.1 DISPROPORTIONATE ALLOCATIONS

The level of development proposed will result in the nature of all the villages being significantly altered. The Group 1 Villages were recorded in the 2011 Census as having the following numbers of Households:

GROUP 1 VILLAGES	Number of HOUSEHOLDS 2011 Census	SUGGESTED ALLOCATION	INCREASE
BROMHAM	2080	500	24%
CLAPHAM	1573	500	31%
SHARNBROOK	900	600	66%
GREAT BARFORD	829	500	60%

Allocations proposed for the Group 1 Villages, and in particular to Sharnbrook, are vastly disproportionate, and based on under ambitious allocations to new settlements.

5.2 CHARACTER OF THE VILLAGES

Development on the scale proposed will swamp a number of Group 1 Villages. Sharnbrook, for example, had 927 dwellings at the last Census. A further 600 dwellings represents an increase of more than 66 per cent in the size of the village. The character, distinctiveness and amenity of the villages, particularly Sharnbrook, would be permanently and irreversibly altered by adoption of the preferred strategy. Sound long term planning principles appear to be ignored by arbitrary imposition of significant levels of development to satisfy short term targets.

In particular, this strategy involves sacrificing sustainability, amenity and character of the Group 1 Villages and choking overstressed infrastructure by squeezing in a target level of development.

5.3 PREFERRED STRATEGY

The majority of development proposed falls into three categories. Those categories are development in or around Bedford and Kempston; the creation of up to 4 new settlements of between 4000 and 6000 dwellings each; and significant development in a number of Group 1 Villages.

Allocations are proposed so that 41 per cent of the development would take place in Bedford and Kempston (on predominantly brownfield sites); 37 per cent would be satisfied by development of 600 dwellings in Sharnbrook and 500 dwellings in each of Bromham, Clapham, Great Barford and Wilstead on predominantly greenfield sites; while only 12 per cent would be satisfied before 2035 using the opportunity presented by development of new settlements.

Meeting development requirements through strategically located new settlements should be the strategy adopted for the new Local Plan. The use of new settlements provides an opportunity to plan developments sustainably and to provide for integrated infrastructure including roads, public transport and school facilities to meet the requirements generated by those settlements. The new settlements should be brought forward much more quickly. The allocation of the Borough housing requirements in one or more of the new settlements can minimise the impact of development on the infrastructure, character and amenity of existing settlements. Development outside the new settlements should be satisfied by brownfield development wherever possible. Greenfield development outside the new settlements should be kept to a minimum. Therefore, the strategy should focus on the development of brownfield sites and new settlements.

5.4 MANAGING DEVELOPERS

Experience of developing new settlements in other areas suggests that the ability to bring forward the development of new settlements will be severely inhibited by the allocation of large sites in the Group 1 Villages. Major developers (of which there is a limited number) will need to cooperate to bring forward the long-term opportunities presented by large scale new settlements. However, the allocation of large-scale alternative sites in Group 1 Villages would represent attractive prospects for developers and inevitably move their priorities away from the more sustainable opportunities presented by the new settlements. The allocation of significant development sites in the Group 1 Villages will therefore be materially prejudicial to the viability and deliverability of new settlements. Allocations should be moved to the new settlements.

5.5 THE EVIDENCE BASE

The information set out in the consultation documentation does not include sufficient information to support the proposed focus of development in the Group 1 Villages.

There is no evidential basis supporting the proposal to allocate development at the levels suggested for the Group 1 Villages. For example, there is nothing to suggest that a proper highway analysis of either villages or sites has been conducted. Similarly, there is no evidence that sewerage, water, electricity or gas infrastructure has been evaluated to establish that it can support the levels of development proposed in the locations suggested or that existing infrastructure is capable of being upgraded to support that level of development proposed.

The information provided to date indicates that the level of allocation proposed in each village has been assessed as the level of development deemed to be sufficient to support the improved infrastructure requirements but it is not clear what infrastructure has been included in this assessment, nor is it possible to assess what additional improvements might be needed in these settlements to mitigate the impact of the proposed levels of development, such as the impact on the local highway network or health facilities. It is, however, apparent that 500 dwellings will not viably support significant investment in infrastructure. For example, although the Borough's statistics indicate that 500 homes might be required to support a new primary school, 800-1,000 homes is the experience elsewhere. Even if a number closer to 500 is correct, providing that school based on such a relatively low level of development is likely to provide little room for the viable provision of any additional infrastructure.

Equally, there is nothing indicating that local employment opportunities might increase significantly in any of the Group 1 Villages as a result of the proposed developments.

5.6 SUSTAINABILITY

Putting aside the inhibiting effect on new settlements and absence of evidence, the strategy proposed runs counter to the principles of sustainability. A disproportionate burden of new development would be borne by Group 1 Villages where allocations are proposed on almost exclusively greenfield land. The complete criteria for each proposed site should be clearly set out to enable a full evaluation of all the proposed allocations to be assessed.

5.7 CONCLUSION

In conclusion, a sustainable plan for development should focus on the opportunity to bring forward new settlements, which can be properly planned from the outset with integrated infrastructure provision and which can be thoughtfully designed and costed. The ability to promote new settlements will be adversely affected by significant earlier development in the Group 1 Villages so the strategy should be to move allocations proposed for Group 1 Villages to new settlements and to bring forward those new settlements much sooner.

The Parish Council accepts that the Group 1 Villages, including Sharnbrook, will need to accept a level of development, but that this should be in keeping with the size of the existing settlements and the existing infrastructure so as to minimise the impact on the settlements. A figure of around 100 dwellings, as proposed at the time of the 2032 consultation, is realistic for Sharnbrook.

6. Do you agree with the list of potential development sites in each Group 1 Village (tables 4-8)? Which sites in Group 1 Villages would you prefer to see allocated and why? Which of the options do you prefer and why? Are there other combinations of sites?

NO. We fundamentally disagree with the list of development sites proposed for Sharnbrook. It is very clear that the introduction of additional development on the scale set out in Options 1, 2 and 3 would swamp the village. Options 1, 2 and 3, which all involve development of site 620 on Odell Road, should be rejected. Some carefully planned development of some of the smaller sites might feasibly be assimilated making Option 4 a possible choice. Our reasons are set out below:

6.1 CHARACTER AND DISTINCTIVENESS

Sharnbrook is an ancient village. It has its own unique character. The centre of the village, running from Kennell Hill at the east, extending the full length of the High Street and along the majority of Odell Road is a Conservation Area dating from 1971. The 2011 Census indicated that Sharnbrook had 927 households and there has been further development in the village since 2011. Sharnbrook has seen significant growth in the number of households from 2001 when there were 778 households recorded. 600 additional households in Sharnbrook represents a vastly disproportionate level of incremental development, increasing the size of the Village by more than 66 per cent from its present size and by 192 per cent from its size in 2001. Such scale poses a huge risk of the Village, including the Conservation Area, losing its original distinctiveness, character and heritage.

6.2 LANDSCAPE SENSITIVITY

The development guidelines for Sharnbrook, set out in the Borough's Landscape Sensitivity Assessment 2017 are to:-

6.2.1 Retain the historic character of the limestone village – encouraging any new development to be sensitive in design

6.2.2 Avoid linear development along roads

6.2.3 Avoid large scale vertical features across the Ouse Valley

6.2.4 Conserve the largely unsettled slopes above the Great Ouse Valley that form a rural backdrop to lower lying, more settled landscape.

Visual sensitivities around the village are stated to include views of the Grade 1 Listed Church of St Peter and views across the valley of the Great Ouse including the Grade 1 Listed Church of St Mary at Felmersham. Those views are to be conserved.

VIEW OF SITE 620 DOWN TO OUSE VALLEY / NATURE RESERVE



VIEW BACK TO ST PETER'S CHURCH FROM THE FOOTPATH AT THE CENTRE OF SITE 620



VIEW OF ST PETER'S CHURCH, SHARNBROOK FROM THE FOOTPATH AT TOP OF 236



6.3 TRAFFIC

The impact of a significant increase in the number of dwellings in the proposed locations of Sharnbrook will hugely increase car journeys through the village, causing the adverse impacts set out below.

6.3.1 The Village is located away from main roads and none of the development within the last 16 years has resulted in the provision of new routes into or out of the Village. From a traffic perspective, the highway system in Sharnbrook currently experiences severe congestion at certain times of the day making it difficult to use the main access route through the village: the High Street.

6.3.2 This was underlined as recently as 2014 when a highway study conducted by the site owners in conjunction with the possible extension of the Unilever site at Colworth concluded that only minimal expansion of the site – limited to a minor building - was possible within the constraints of Sharnbrook's existing highway infrastructure.

6.3.3 The proposed development of 600 additional households will generate no material additional employment within Sharnbrook. Figures from the 2011 Census show that the majority of Sharnbrook's working population travels between 5km and 20km to get to work. Car ownership runs at 1.85 cars per household and taking account of the likely destination of these trips by analysing the settlements within those travelling distances it is clear that the majority of those trips will be towards the A6 at the east of the Village. That means that trips from many of the proposed sites, but particularly Site 620, would be forced to use the High Street, past the particular pinch point that exists outside the Co-op, where the road is narrow with footways on both sides.

6.3.4 The only alternative route to the A6 is via Felmersham and Radwell along narrow rural roads which cross the flood plain in two places. It is well documented that this route is subject to closure by regular seasonal flooding at both Felmersham Bridge and Radwell Bridge.

6.3.5 The physical constraints affecting the Village make it both very difficult and extremely expensive to improve the situation as any solution would involve by-passing the centre of the Village. Even if a relief road were financially viable (which, given the other infrastructure requirements such as a new school, would put an unrealistic financial burden on any potential development), any route would need to run between the River Great Ouse and the High Street. That route is physically blocked by land within the ownership of Ouse Manor (which is itself listed) and through the heart of the conservation area.

RECENT PHOTOGRAPHS OF SHARNBROOK HIGH STREET



This lorry struck and damaged the building. The 6'6" restriction was ignored.



Regular deliveries to the Co-op. The narrowest point on Sharnbrook High Street.



Ambulance could not pass due to the poor parking in the area.



Lorry parked in the middle of the road making a regular delivery to the NISA store.



The junction with Park Lane has a 6'6" width restriction – often ignored.

6.4 SCHOOL PROVISION

The Borough's assumption that 500 houses is the figure required to support a new primary school is significantly lower than the figure used in other parts of the country. 800 - 1,000 houses is the experience elsewhere. While Bedford has recently worked at a figure well below 800 - 1,000, the Borough's education paper suggests that Sharnbrook's pupil yield has been significantly lower than expected in recent years. As stated in 6.6 below, it is highly unlikely that Site 620 can be delivered and the piecemeal nature of the other sites in Sharnbrook makes it impossible to generate sufficient payments to fund a new school.

6.5 OTHER FACILITIES

6.5.1 A number of the other facilities in the Village are at capacity. Both of the general stores on the High Street are currently viable but constrained by size. The Co-op is particularly restricted by lack of both retail and storage space and neither store has rear access for deliveries. The Co-op is just about able to cope with existing demands from the Village at its current scale but would find it almost impossible to absorb a 66 per cent increase in the size of the Village. It has said it would need to relocate. These comments are set out in Appendix 1.

6.5.2 Equally the doctor's surgery is at capacity. The pressures faced by GP practices mean that the surgery does not have the resources to respond to the Borough consultation in writing. It has been looking to redevelop for some time and said that it would not be able to function in its present location in the face of an increase in the village population. It would need to relocate to new premises for which a budget of approximately £1.5m is estimated to be needed from developers (excluding land values).

6.5.3 As mentioned, no data has been provided by the Borough in relation to the capacity of existing services. The Parish Council has no reliable information on electricity or gas capacity but the domestic water supplies and sewage systems are both understood to be operating at capacity at the village's current size.

6.6 SPECIFIC SITES

The Parish Council has received numerous comments on the proposals set out in the Consultation Paper. Taking account of those comments, the Parish Council's views are: -

SITE 620

6.6.1 Incremental construction approaching 600 dwellings in Sharnbrook can only be achieved by development of Site 620. However, this is a large greenfield site on Odell Road which is designated within the Borough's Policies Map as a Village Open View (Policy AD40 - Area N).

The development of this site would materially impact upon the amenity of the Village and destroy these protected views over the Ouse Valley from the Village. Its development would run totally contrary to the Borough's own guidelines for development set out the **April 2017 Landscape Sensitivities Assessment, specifically 6.2.1 to 4.**

6.6.2 Development of this site will also generate significant additional traffic movements throughout the village. Self-evidently the site has no linkage to the A6 without negotiating Sharnbrook High Street, which already experiences severe congestion in the morning and evening peak periods and at school drop off and pick up (as mentioned in 6.3.1 above). The High Street is often unsafe, with large vehicles mounting the footways and damaging property. There is no viable solution to this problem, which will be hugely exacerbated by any development of Site 620. The promoter of Site 620 has suggested in its comments on the 2032 Call for Sites that development of Site 620 would facilitate the construction of a relief road. It is disingenuous to suggest either that this problem will ultimately be alleviated by addition of a relief road; or that development of Site 620 might in some way facilitate the construction or a relief road. As mentioned above, a relief road is neither viable nor practicable.

6.6.3 From an ecology perspective, Site 620 has an impact on the SSSI at Felmersham Gravel Pits nature reserve. The nature reserve falls within Sharnbrook Parish and borders the south eastern boundary of Site 620. The BCN Wildlife Trust is preparing its own response to the Borough Plan Consultation but following consultation with the Bedford Office of the BCN Wildlife Trust, it is understood that the Trust is concerned about anything that may affect the SSSI status of the Felmersham Gravel Pits nature reserve. We are informed that the groundwater in Site 620 is considered essential to supporting the water plants and dragonflies for which the SSSI status was established.

6.6.4 It is noteworthy that Site 620 was not publicly proposed for development at the time of the 2032 consultation. The site was eventually brought forward by way of comment on the 2032 Consultation dated December 2015. It therefore avoided public scrutiny and comment at the time of the 2032 Consultation.

The site is owned by a landowner with a long history of development within the Borough. Its omission from the 2032 consultation would not have been as a result of landowner oversight. It was presumably therefore not considered suitable either by the landowner or the Borough at the time the 2032 Consultation took place. Nothing about the Site or the local infrastructure has changed since the time of that consultation.

6.6.5 It is equally notable that the **Borough's Sustainability Appraisal** of Site 620 published in April 2017 shows 4 red flags. The site's only positive feature shown by the Sustainability Appraisal was related to its scale – in other words from a sustainability perspective, the only point in its favour shown by the Appraisal is that it is large enough to accommodate different types of development!

6.6.6 Site 620 would not be considered for development in accordance with any normal planning principles. It should not be considered for development.

Site 236

6.6.7 It is suggested that the lower portion of Site 236 on Kennell Hill might be developed. The lower part of site 236 adjoins the Sharn, and floods each winter. Flooding results both from surface water run-off from the higher parts of the field and from the Sharn bursting its banks. Flooding from the Sharn has increased in both area and frequency in the last 20 years. The

flooding impacts on properties on both sides of Kennell Hill. The Sharn does not have the capacity to deal with additional surface water run-off that would result from development of Site 236.

6.6.8 Groundwater levels at Site 236 are also very high. Each of the houses in the adjoining Conservation Area has a shallow well and there is a stream that is clearly visible that has emerged on Godfrey Lane and has run continuously for the last 2 years. Site 236 has a number of underground streams. Building foundations will block these streams, forcing water to the surface elsewhere.

6.6.9 Site 236 does not have gravitational access to existing sewage infrastructure (which lies to the south of the Sharn). A new pumping station would be required to remove sewage up hill to join the main sewer adjoining the Fordham Arms. This is not thought viable.

6.6.10 As the Consultation Paper acknowledges, development of the upper part of Site 236 will impact unduly on the countryside. It is an important amenity area for the village, frequently used by walkers from the village and outside. There are commanding and beautiful views of the Sharn Valley, the Ouse Valley and the Spire of St Peter's Church from the footpath adjoining Site 617 all of which will be lost by development of the field. Its development would contravene the Council's own guidelines for development in the 2017 Landscape Sensitivities assessment. Equally, the field adjoins the existing Conservation Area and listed buildings on two sides. The houses in Sharnbrook High Street, Kennell Hill, Godfrey Lane and Park Lane and the footpaths along those highways enjoy views over the field which would be lost by development. It should be re-designated as Village Green Space.

6.6.11 By contrast with Site 620, Site 236 was publicly proposed for development at the time of the 2032 Call for Sites. The Parish Council was therefore able to comment on Site 236 at that time. It expressed strong opposition to the development of Site 236 at that time and remains opposed to the development of this Site.

Site 234

The lower part of site 234 is susceptible to flooding. The remainder of the site absorbs significant run off from the north of Mill Road. It is not considered suitable for development.

6.7 SITES SUITABLE FOR DEVELOPMENT

As mentioned, a few smaller scale sensitively designed developments might be assimilated within the framework of the Village.

6.7.1 **Site 238**, a partially brownfield and partially scrubland site on Yelnow Lane and **Site 527** adjoining Sharnbrook School, could be considered for properly planned development. The site in Yelnow Lane should be prioritized in the context of sustainable development principles, and the small section of site 527 designated as Village Open Space (Policy AD40 Area O) protected in the process. The proviso here is that, as noted in the Parish Council's comments on the 2032 Call for Sites, Site 238 contains a surviving example of ridge and furrow which should be retained and preserved.

It may be possible to create more than 100 dwellings on those two sites without requiring, for example, an additional school and without unduly impacting on traffic movement in the centre of Sharnbrook. For example, attempts have been made previously to bring forward part of Site 527 as a care home. This would require no educational provision, have only minimal traffic impact on

the centre of the Village and provide greater facility for an ageing population, thus freeing up other dwellings in the village for families whilst allowing older residents to continue living in the village. The Parish Council's comments on the 2032 Call for Sites accepted that development including a care home (or sheltered accommodation or a residential home) might be acceptable on this site. Equally, Yelow Lane can be accessed through Sharnbrook along the same route used for Colworth, without creating a significant bottleneck at the Odell Road/High Street junction. Both sites might be developed without also requiring significant additional public transport provision.

6.9.2. Mill Road and Kennell Hill, at the Eastern side of the village, already bear the brunt of traffic coming into the Village from the A6. Three sites along Mill Road are currently under development or have recently been completed. (providing 19 new households) **Site 617** on Kennell Hill may be appropriate for infill type development. The site is currently designated as Village Open View (Policy AD40 – Area I) but development of that field which is modest and in keeping with the adjoining Conservation Area might be acceptable. Policy AD40 - Area I would be more appropriate to transfer to Site 236 instead). The Parish Council indicated in the response to the 2032 Call for Sites that it would not oppose development of Site 617. The site will require a surface water management system to be installed as currently run off water goes to a ditch on Kennell Hill and then to the Sharn. The ditch is already beyond capacity as it also takes surface water run-off from the developments on the more elevated land at Mill Road. The ditch overflow recently led to flooding of the lower land at the entrance to Godfrey Lane. The Sharn floods in the Kennell Hill area so any water should be taken downstream of the existing dwellings. Any development will also need to take account of constrained access from Kennell Hill.

The foul pumping station at the lowest point on Kennell Hill is already beyond its capacity and will need a significant upgrade to support any further development (a recent expensive attempt to upgrade it has not succeeded).

7. Do you agree with the amount of development identified for the Group 2 Villages as part of the preferred development strategy (225 dwellings)? If not, should the amount be higher or lower, what should the number be and how should the strategy change as a result?

NO. The level of development in Group 2 Villages is proposed on the basis of an assumed level of space available in the existing village primary school or nearby. The level of development proposed should not simply be linked to notionally available primary school space. The strategy should be more flexible and recognize that not all development inevitably requires the same level of primary school capacity. Smaller units of single bedrooms or sheltered/retirement accommodation are likely to place no strain on local schools. The basis of allocation is over simplistic and should be based on wider principles.

Proper evaluation should take place, with development spread fairly, based on broader sustainability principles. So, where brownfield land is available within Group 2 Villages

consideration should also be given to appropriately designed and properly assimilated development of those sites.

Consideration should also be given to maintaining the viability of existing facilities in the Group 2 Villages. Many villages have seen their shops and pubs close as the viability of those facilities has reduced over time. Most of the Group 2 Villages have a limited retail offering and fewer pubs remaining open. A level of development in the Group 2 Villages will help to maintain the viability of those facilities and should be supported.

- 8. Do you agree with the shortlist of sites for each Group 2 Village (tables 9-14)? If not, which sites should be included in each village to meet the strategy requirements?**

The principle should be that development of brownfield sites should be encouraged before using Greenfield sites. Subject to that principle, before sites are allocated there should be a full assessment of suitability of each site taking into account issues of access, sustainability, flood vulnerability and amenity value.

- 9. Do you agree with the approach for Group 3 and 4 settlements in the preferred development strategy (that rather than having specific sites allocated in the local plan there should be a local plan policy to allow small amounts of development if supported by the local community)? If not, how should Group 3 and Group 4 settlements be treated in the development strategy? Do you have comments on the wording of the draft policy for Group 3 and Group 4 settlements?**

NO. Satisfaction of each of the criteria proposed before development can take place in a Group 3 or 4 settlement appears highly improbable. For example, it is hard to conclusively demonstrate that incremental development will maintain an existing facility but it will be the case that incremental development will contribute to the ongoing viability of a facility. Equally, full support for development from both a Parish Council and the majority of the local community seems a high hurdle and imposes a test which, if applied rigorously, seems likely to make development extremely difficult at best. The criteria applied should be less stringent. If there are brownfield sites available in those settlements, the ability to develop those sites should not be unduly fettered by over restrictive criteria, a principle similar to that set out in paragraph 8 should be followed at least for brownfield sites in those villages.

- 10. Do you agree with the selection of local green spaces? If not, and given the assessment work that has already taken place, which sites do you think should be removed from or added to the list?**

NO. We feel that the field opposite the end of Templars Way on Mill Road/Kennell Hill should be added to the list, as well as **site 236**.

- 11. Do you have any comments on the updated or new background documents?**

YES. The evidence base supporting the "preferred strategy" is not provided by the background documents. It is also clear from the dates and late publication of many of the background documents that the "preferred strategy" was settled in advance of the finalisation and consideration of the background documents.

- 12. Specifically, in relation to the new settlement proposals, do you have any comments on our initial appraisal of the sites that have been put forward, set out in the study "New Settlements Assessment Framework Methodology and Initial Site Assessment"? Having read the appraisal do you have a preference for which settlement(s) the Council should investigate further with a view to allocation?**

YES. Each of the proposals should be properly investigated and evaluated as a matter of real priority. As mentioned above, the strategy should be to meet the Borough's development targets through strategically located new settlements which have been properly planned and can be developed to provide integrated infrastructure.

As noted in the paper, the Borough is in the relatively early stages of evaluating each site. Until a more detailed evaluation can be concluded, and a "show stopper" as described in the paper has been identified, none should be ruled out.

APPENDIX 1

Comments received from Sharnbrook Co-operative Stores in March 2017.

I understand that there is a government requirement for the village to enhance its population to up to another 600 homes.

The chairman has (asked) for me to include some details to help the vote in April come to the correct decision.

Deliveries:

At present, the delivery cycles are 1 x chilled delivery every day. The timings of this from drop off to departure are on average 35 - 40mins.

- Prior to the delivery we having to store on average to recycling cages in the road as agreed and on average 4-5 empties (bread, milk, roll cages etc).
- The 30mins includes the loading of the items listed above.
- With the only designated spot for the truck to unload being directly in front of the Vets, the knock-on effect is 1/2 (the width of) the road for this period of time, slowing traffic as a result.
- On a Monday Wednesday and Friday, there is also an additional ambient delivery of, on average, 5 cages.
- Again, the drop of and departure times tend to be around the 35-40minute mark.
- So, on the days where we have the 2 deliveries, we are restricting the access for over an hour.

Trade

- With the proposal of up to 600 homes even at 3 people per household on average, that could mean 1800 extra potential customers through our doors (here's hoping.....). Being blunt the store couldn't support an additional 1800 customers in its current location. Please let me explain why. On average we are selling 5 items per person sometimes more. That would mean that if every one of the new customers visits the store once per week it will involve another 9000 units sold. The shop floor isn't my concern, it's the storage of the stock, and us running a safe and legal store, as the back areas are laid out to its maximum capacity as it is. The store at Christmas is already operating at maximum capacity for what is safe for customers because I'm (sure) nobody has failed to miss the 2-deep snake around the store of customers at that time of year.
- Also, with the increase of sales, naturally the deliveries will have to evolve with it. With are current trade it's manageable, and doesn't present too much disruption to the community, but doubling our turnover will near enough double deliveries to cater for the stock.
- The estimated delivery times based upon experience across the CO-OP business, a store trading at the forecasted 45-50k per week would be around the following.
- 6/7 chilled deliveries p/w averaging around 1hr per drop and 4/5 cages per delivery on chilled.
- Ambient delivery would then be 5 to 6 deliveries per week of around 1hr per drop. The total disruption time to the community increases by nearly 50%
- I have based our figures on the Redhill store in Wellingborough due to back area logistics and that store turns over the estimated figure this shop could trade.

What I would ask the planners to think about is the potential site for the COOP to be relocated if the business sees fit.

Phil Harris
Store Manager
Sharnbrook