

LP2040 DRAFT LOCAL PLAN FOR BEDFORD BOROUGH

Plan for Submission June – July 2022

Land at Kennel Hill, Sharnbrook

Prepared by Fisher German LLP on behalf of Anwyl Land

Project Title

Land at Kennel Road, Sharnbrook

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1. Introduction

1.1 This representation has been prepared on behalf of Anwyl Land in respect of their land interests at Kennel Hill, Sharnbrook as illustrated on Figure 1 below – the site is edged red. This site is an omission site in the emerging Bedford Local Plan 2040. The site is considered suitable for allocation in the scenario that further housing sites are required to enable the Local Plan to be found sound (as we consider to be the case as set out within these representations).



Figure 1: Site Location Plan, Land at Kennel Hill, Sharnbrook

1.2 The site has been previously promoted through the various stages of the adopted Local Plan, Neighbourhood Plan and was included as a preferred site as part of the Council's 2017 consultation paper. Technical documents to support the allocation of the site were submitted, including highways and landscape, demonstrating the sites acceptability and deliverability. Despite this however, the adopted Plan opted to defer allocations to subsequent Neighbourhood Plans, which would deliver the housing targets set out in the Local Plan. For Sharnbrook, the Local Plan allocated 500 dwellings to be delivered through the Neighbourhood Plan.

1.3 Sharnbrook is designated in the Local Plan as a Key Service Centre, which are described as settlements *“which contain a good range of services and are well connected to larger town centres by regular public transport. They provide a strong service role for the local community and surrounding area”*.

- 1.4 The Sharnbrook Neighbourhood Plan Examiner's Report was published on the 19th July 2021. This concluded that the Plan could proceed to referendum subject to modifications, despite significant concerns relating to the deliverability of the Plan's key allocation (Hill Farm) and limited evidence to support that the housing requirement could be met having regard for the Plan's short period up to 2030. The allocation at Hill Farm is predicated on delivery of significant improvements to the junction at the A6, with no confirmation from County Highways that the proposed Neighbourhood Plan allocation is deliverable.
- 1.5 A referendum on the Neighbourhood Plan was held in October 2021. The Plan passed the referendum with 457 votes in favour and 80 against, with a 30% turnout. Following this result, the Plan was formally made by Bedford Borough Council in November 2021.
- 1.6 A planning application has been submitted on the Plan's primary allocation, a strategic scale development isolated from Sharnbrook to the east, for up to 500 dwellings and other community infrastructure (ref: 22/01037/MAO). Key consultation responses are yet to be received for this application at time of writing, including highways.
- 1.7 This representation follows policies in the order that they appear in the consultation document.

2. Representations

The Tests of Soundness

- 2.1 As this consultation stage concerns a Local Plan 2040 Draft for Submission (Regulation 19), the consultation seeks views on the legal tests of soundness and legal compliance. Paragraph 35 of the National Planning Policy Framework (NPPF) (2021) states:

"Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

- a) *Positively prepared* – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
 - b) *Justified* – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
 - c) *Effective* – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) *Consistent with National Policy* – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national policy, where relevant."
- 2.2 It is our view, for the reasons set out below, that the Local Plan is not sufficiently justified, is not effective and is not consistent with National Policy. It therefore fails to meet the legal tests of soundness.

Policy DS2(S) Spatial Strategy

- 2.3 The overarching aims and ambitions of the Spatial Hierarchy are generally supported. However, we have concerns that the approach adopted underutilises the role of existing sustainable settlements, including Sharnbrook, and places a significant overreliance on the delivery of new settlements and is not therefore sound because it has not taken full account of all the reasonable alternatives or is likely to be deliverable as discussed within these representations.

2.4 Reasonable alternatives are discussed within the 'Development Strategy Topic Paper' (May 2022). It notes that the Oxford to Cambridge Arc impacts are not yet known and so the growth strategy focuses only on Bedford's own growth requirements.

2.5 Through previous consultations, the following growth options were put forward:

- Option 1a – development in and around the urban area only
- Option 1b – sites within the urban area at enhanced density
- Option 2a: Development in and around the urban area, plus A421 transport corridor with rail-based growth – south.
- Option 2b: Development in and around the urban area, plus A421 transport corridor with rail-based growth – south, plus one new settlement.
- Option 2c: Development in and around the urban area, plus A421 transport corridor with rail-based growth, plus two new settlements.
- Option 2d: Development in and around the urban area, plus A421 transport corridor with rail-based growth – south and east, plus one new settlement.
- Option 3a: Development in and around the urban area, plus four new settlements.
- Option 3b: Development in and around the urban area, plus two new settlements, plus key service centres.
- Option 3c: Development in and around the urban area, plus two new settlements plus key service centres, plus rural service centres.
- Option 4: A421 transport corridor with rail-based growth, plus key service centres, plus rural service centres.
- Option 5: A421 transport corridor with rail-based growth, plus two new settlements.
- Option 6: A421 transport corridor with rail-based growth, plus two new settlements, plus key service centres, plus rural service centres.
- Option 7: Development in two new settlements, plus key service centres, plus rural service centres.

2.6 Within the topic paper, the Council consider that a reasonable alternative for the purposes of the NPPF test was an alternative that could provide dwelling growth within 10% of the required need.

2.7 As detailed in response to Policy DS3 and DS5, there seems a reluctance by the Council to allocate further growth to either the Key or Rural Services Centres despite the acknowledged available capacity and the benefit being that proportionate growth would be delivered earlier in the Plan period, rather than almost solely relying on the delivery of strategic sites. In the context of immediate housing need and the current cost of living crisis, failure to deliver housing in the Borough will impact affordability levels and may continue to suppress natural household formation. All settlements, but particularly sustainable settlements with a service offer, need proportionate and commensurate growth throughout the Plan period, to ensure they do not age and stagnate. In respect of Sharnbrook, as discussed later in the representations, no growth is directed there as of yet as the Neighbourhood Plan directs all growth away from the settlement

and thus capacity clearly remains for commensurate growth adjacent to the settlement.

- 2.8 Land west of Kennel Hill, Sharnbrook has already demonstrated through historic assessment and as a option site, that there would not be any unacceptable adverse impact on the landscape and settlement character as a result of the site coming forward for development. In terms of the reduced ability for rural sites to be accessible to rail by active travel, it is important to note that some sites would be accessible by active travel, but more broadly they would be accessible by green travel through the ongoing transition to hybrid and electric cars and public transport. Moreover, due to an increased prevalence in home working and online deliveries, people are able living more sustainably in what was traditionally considered to be a less sustainable location. Regardless, as recognised through the designation as Sharnbrook as a Key Service Centre, it already benefits from a good level of connectivity and service offer.
- 2.9 The Plan and Strategy also has a deliberate disregard of the role that Neighbourhood Plans should be playing in accommodating growth beyond their current period to 2030. Neighbourhood Plans should be policy bound to allocate an amount of growth up to 2040, as they were obliged to within the 2030 plan (see current policy 4S). NPPF Paragraph 66 sets out that Strategic Policies should *"set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations"*. Clearly to reflect the overall strategy as required by the NPPF, this must extend requirements up to 2040. Currently, according to the Council's published trajectory, the delivery of housing will cease in the year 2030/31 in "Sharnbrook" (albeit that reflects Sharnbrook Parish, not Sharnbrook itself).

Policy DS3(S) Amount and timing of housing growth

Amount of Housing

- 2.10 Policy DS3(S) outlines the Council's preferred approach to the delivery of housing, including the housing requirement and the temporal delivery of housing over the Plan period. This includes a 'stepped trajectory', with the housing requirement to increase throughout the Plan period.
- 2.11 The Plan utilises the baseline Local Housing Need (LHN) as the housing requirement, equating to 27,100 dwellings over the Plan period. The PPG is clear that when establishing a housing requirement *"the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area... Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates."* [our emphasis] (Paragraph: 010 Reference ID: 2a-010-20201216). Examples of scenarios which

may justify an increase of housing requirement include growth strategies, the delivery of strategic infrastructure improvements or the requirement of an authority to take on unmet need from a neighbouring authority.

2.12 It is important to note that the PPG sets out that the consideration of whether uplifts to the housing requirement from LHN are necessary should be undertaken prior to and independently of any consideration of the ability of an area to meet that need.

2.13 The Plan discusses the housing requirement at Paragraphs 4.7 and 4.8 of the reasoned justification, albeit there is no discussion as to whether a higher housing requirement would be justified. The reasoned justification seems to challenge, informally, the LHN requirement. The Plan asserts that population would need to increase by 50,000 people with in-migration of more than 22,000 a year above existing trends to populate homes within Bedford at the standard method rate of 1,355 dwellings per year. However, it is significant to note, and acknowledged within the Plan, that Bedford Borough falls within the Oxford to Cambridge Arc. Whilst there is a lack of clarity on the onwards direction of the top-down vision for the Arc, accelerated growth is likely to occur irrespective, led through economic demands which will drive an above historic trend rate of growth and migration. Furthermore, the Plan's assumptions do not reflect a higher level of natural household formation rate, which may currently be suppressed due to a lack of housing or house prices more generally. Looking at historic rates of delivery could therefore become a self-fulfilling prophecy in that historic suppressed growth and/or suppressed household formation rates could be used to feed into justification for any subsequent strategies and serve to further suppress latent growth.

2.14 The LP2040 is **not consistent with national policy** because it does not plan for sufficient housing to meet future needs and does not proactively plan for any uplift as a result of the Arc Framework. It remains our view that a higher housing figure beyond the Local Housing Need Figure (which is intended to be a minimum figure within the PPG) should be planned for within the LP2040 in order to ensure a sound Plan.

2.15 Notwithstanding concerns relating to the delivery of the quantum of the housing proposed as discussed later within these representations, it is further noted that the Council have provided only a 5% buffer to ensure delivery. Given the reliance on difficult to deliver strategic sites which are highly likely to be delayed, as discussed within these representations, the Council at a very minimum should be seeking to provide a 10% buffer to ensure delivery, by ensuring choice and

competition in the market. As set out below, the Council's current approach monopolises housing land within Bedford to a select few landowners, which allows them to control price and delivery rates in a manner which suits them, not necessarily which delivers the quantum of housing Bedford needs.

Timing of housing growth

2.16 The stepped trajectory is proposed as follows:

- 5 years 970 dpa = 4,850 dwellings during the period 20/21-24/25
- 5 years 1,050 dpa = 5,250 dwellings during the period 25/26-29/30
- 10 years 1,700 dpa = 17,000 dwellings during the period 30/31-39/40
- 20 years average = 1,355 dwellings during period 20/21-39/40

2.17 The stepped trajectory as proposed results in the delivery of 4,850 dwellings in the first 5 years (970 per annum), 5,250 in the next 5 years (1,050 per annum) equating to 10,100 dwellings in the first 10 years. This then dramatically steps up to 1,700 dwellings per annum over the final 10 years equating to 17,000 dwellings. This is an almost 70% increase from the requirement in the first 10 years of the Plan period to the requirement for the latter 10 years. To deliver this quantum of housing, the Council is relying on undeliverable levels of growth on the two strategic new settlement allocations (Kempston Hardwick and Little Barford) as discussed below.

2.18 Paragraph 4.27 of the emerging Plan advises that there is limited opportunity to bring forward additional sites in the early years of the Plan period due to the requirements for the delivery of strategic sites and the inter reliance on new development and the completion of major infrastructure projects which is why the stepped trajectory is required with significant growth pushed back to the latter part of the Plan period.

2.19 The approach oversimplifies matters and fails to recognise the latent capacity within the wider Plan area for existing sustainable settlements to deliver growth through smaller sustainable sites; which collectively could deliver a significant quantum of supply (such as land at Kennel Hill, Sharnbrook). Crucially, this supply can be front loaded in the Plan period, as sites within the smaller sustainable settlements are generally 'shovel ready', essentially meaning following allocation housebuilders are able to start quickly and deliver quickly. In addition to this, the delivery of such sites ensures the Council's overall housing portfolio is varied, appealing to both a wide range of housebuilders and housing markets, thus ensuring the greatest choice and competition

in the market, which ultimately drives delivery whilst protecting the continued over inflation of house prices. This approach also helps SME housebuilders to operate in the area.

- 2.20 In relation to Sharnbrook in particular, it is noted that the Sharnbrook Neighbourhood Plan allocates a strategic allocation isolated from the settlement of Sharnbrook, east of both Sharnbrook Coffle End (a separate Small Settlement in the extant Local Plan) and the Midlands Main Line. This development, once complete, will in essence be a new small settlement. In this context, whilst the Neighbourhood Plan may have met its requirements in respect of the 500 dwellings allocated by the adopted Local Plan, there are no allocations within the settlement of Sharnbrook itself and there remains capacity for Sharnbrook itself to absorb growth, both within the initial years of the Plan period to assist with demonstrating a five-year housing land supply, but also up to 2040.
- 2.21 The AECOM Report prepared by the Neighbourhood Plan confirms that the allocated site is isolated from the main settlement numerous times, as follows:

"Although the site may appear to be adjacent to the small settlement at Coffle End, it is physically separated from it by an operational railway. The site is adjacent to some isolated small residential sites and is overall outside and not connected to the existing built up area"

"The site is outside of and removed from the existing settlement boundary of Sharnbrook. It is approximately 1.5km from the existing village of Sharnbrook, but adjacent to the small settlement of Sharnbrook Coffle End, separate by a railway line"

"The site would be adjacent to Sharnbrook Coffle End and would significantly change the size of the settlement and extend Sharnbrook Coffle End to the A6 to the east."
[our emphasis].

- 2.22 This unacceptability of this approach is demonstrated an appeal in Bedford, reference (APP/K0235/W/16/3161915: Land Off Station Road, Turvey). In this appeal, the Inspector states *"the appeal site would adjoin Turvey Station End and not Turvey. Both settlements are separated by open countryside. I acknowledge the public footpaths through the countryside and the footpath along Bedford Road which connect them. However, these routes are not short enough to lead me to any different conclusion other than Turvey Station End is a separate settlement to Turvey"*. This is the exact same position as Sharnbrook and Sharnbrook Coffle End and as such Sharnbrook, a designated Key Service Centre is yet to receive any positive allocations and thus capacity clearly exists for positive allocations as part of this Local Plan or future iterations of the Neighbourhood Plan.

2.23 A particularly concerning element of the Neighbourhood Plan proposal is moving the primary school from Sharnbrook itself, where most people live, to the new settlement which will be significantly smaller. This will inevitably encourage car journeys as for some in Sharnbrook the school will now be a significant distance away. Moreover, the key pedestrian connection, being the most direct route between the new settlement and the village, is also of concern. The footpath north of Templars Way, particularly when crossing the bridge over the railway, is very narrow. This will likely preclude some road users, such as those in wheelchairs or with buggies and prams. Whilst some areas of narrow pavement are expected, this is an extended length during which users would be very close to passing vehicles for an extended period. This footpath, particularly when crossing the bridge over the railway line, is likely to be considered as hazardous and thus is likely to be avoided. Figure 2 below demonstrates the issue, showing the narrowness of the path adjacent to a large vehicle. The Neighbourhood Plan proposed the intensification of use of this footpath for young children which is a particular concern.



Figure 2: Footpath adjacent to Templars Way (source Google Street View)

2.24 Such a route will be a significant concern for many, but particularly parents who would likely need to hold tightly young children from behind or in front, given there appears to be insufficient space for two users to walk side by side, without one being forced against the wall/shrubs or be at risk from traffic. Whilst the path alongside Mill Road is better, being an underpass rather than a bridge and with a larger footpath, this route for many future residents will be a major detour, adding further to the distances one would need to travel into Sharnbrook from the new site and further increasing the use of the private car. Furthermore, it is not clear whether the education authority

would actually support a new school in such a location.

- 2.25 It also remains unclear as to the timings of the delivery of new infrastructure, particularly the new roundabout on the A6 which is required to facilitate the development and as such it is not clear when development will commence, notwithstanding the other works necessary to facilitate the strategic scale of development of up to 500 dwellings. Whilst an outline application is submitted, it does not appear to be close to a decision. There will be the need for further work at reserved matters stage, discharge of conditions and the completion of groundworks and other preparatory measures necessary prior to the delivery of the first units. Despite this, the trajectory provided in support of the Plan considers the site will deliver 35 units in 2023/24. Clearly this is highly optimistic and likely non-deliverable. We consider it unlikely, given the requirements for significant infrastructure, that any housing will be developed in the first five years of the Plan period, reducing the supply by 130 dwellings. Given the likely need for more housing in Bedford in both the short term and Sharnbrook across the extended period up to 2040, additional sites can be allocated within the settlement to cover any shortfalls. Whilst the route between the site and the new school is not ideal for the reasons discussed above, the land at Kennel Hill is spatially optimally located to utilise both the services and facilities in Sharnbrook and the new settlement.
- 2.26 Sites such as Kennel Hill will likely be needed to ensure the Council is able to demonstrate a 5 year housing land supply on adoption of the Local Plan. This approach would further ensure the provision of a satisfactory buffer to provide contingency should the strategic allocations/new settlements fail to deliver, or deliver as anticipated, which we consider on the basis of evidence and our experience elsewhere is likely to be the case.
- 2.27 It is considered that the timing of delivery from the new settlements proposed in the Local Plan 2040 is overly ambitious and fails to reflect past delivery rates and evidence associated with bringing forward similar sites. The Wixams is a prime example. The site was first identified as a location for new housing in the late 1990s through the Bedfordshire Structure Plan adopted in 1997, and the Elstow New Settlement: Planning and Development Brief, adopted in September 1999. The role of the latter was to provide the framework for the submission of both the outline and reserved matters planning applications for the timely delivery of the settlement. The outline planning application for the core site was submitted in November 1999. In September 2005 the Council, in consultation with the land promoters, published and adopted The Wixams Strategic Design Guide SPD, to further guide and expedite delivery of the site. At this stage, it was anticipated that the entire development would be delivered within 15 years; this would have meant

that the site would have been close to being fully built out in 2022.

2.28 However, despite this and the intervening 17-year period, the most recent monitoring report, confirms that only the initial phases have been completed in full with significant development still to be brought forward, despite construction commencing as far back as 2007 (15 years ago). In the case of the Wixams, it took over 9 from the submission of the outline planning application for the first delivery of housing, despite explicit policy support. Since then delivery has still been far slower than expected.

2.29 The Wixam’s highlights the complexity associated with the delivery of new settlements. Whilst the continued delivery of the site is of course promising, the difficulty in reaching this stage, on a site within Bedford Borough, should act as a severe warning as to the obvious pitfalls associated with strategic delivery of new settlements and should be factored into the Plan’s strategy and its over reliance on new settlements delivering the whole of the LHN moving forward.

2.30 Despite the significant delays associated with the delivery at Wixams and other strategic sites within Bedford, and also evidenced through other Local Plans which have acknowledged failure due over reliance on strategic sites (Charnwood, Rushcliffe, West Northamptonshire, etc), the Council have seemingly wed themselves to a strategy which once again, places an over reliance of strategic development, including new settlements. This approach is not justified and therefore not sound.

2.31 Start to Finish (Nathanial Lichfields) reinforces the examples above and sets out that applications for schemes over 500 dwellings are unlikely to make a contribution in the first five years. This is primarily due to the complex planning issues related to both the principle of development and the detail of implementation. Where applications have been determined more quickly than the average, this is as a result of matters being substantially addressed prior to submission which, when combined with the determination period, still adds up to the same amount of time; as the report states *"there is rarely a way to short-circuit planning"*.

2.32 The NLP report goes on to state:

"Planned housing trajectories should be realistic, accounting and responding to lapse rates, lead-in times and sensible build rates. This is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and then being realistic about how fast they will

*deliver so that supply is maintained throughout the plan period. Because no one site is the same – and with significant variations from the average in terms of lead-in time and build rates – a sensible approach to evidence and justification is required.**

- 2.33 Whilst the site promoter may point to more optimistic timescales, a far more cautious and evidenced approach is required, with smaller and more deliverable sites allocated to deliver immediately, in order to ensure a sound Plan.
- 2.34 In relation to the proposed Kempston Hardwick New Settlement (Policy HOU14), it is noted that the site has no current planning status according to the Council’s online mapping. Land Registry details confirm that the site is in multiple ownership. It is not clear to what extent the landowners are in agreement as to the delivery of the site or whether there is agreement between all parties to bring the site forward. As set out above and demonstrated through the complex history associated with the Wixams, strategic scale development is difficult to deliver and takes a significant amount of time. These difficulties are compounded when the development covers multiple land ownerships.
- 2.35 The Little Barford proposed allocation (Policy HOU19) appears to be within a single land ownership, but will still require significant time to deliver. The site is attached to St Neots, a town within neighbouring Huntingdonshire District. It is not clear whether Huntingdonshire have commented or agreed to this proposal. Clearly by locating development here, residents are most likely to work and spend in St Neots, not within Bedford. This therefore limits the benefits provided by this housing, without any compelling justification. Bedford’s LHN should be met and development located where the need is. There is no compelling justification for the approach adopted by the Council and this is a significant concern. Not only is the delivery of the new settlements not sound, the overall approach of directing almost all of Borough’s housing need to new settlements is also unjustified and fails to reflect the housing needs of the Borough as a whole. The proposed approach to the distribution of development fails to recognise the role smaller settlements, including the Key and Rural Service Centres, play. The delivery of housing to new settlements only fails to help young people remain in the settlements where they currently live, forcing younger people and families out of villages and contributing to a lack of social diversity within existing settlements. It also fails to support the vitality and viability of existing businesses and services in rural settlements, potentially risking their ongoing operation. The approach also fails deliver a variety of housing to the housing market, preventing choice and competition as

advocated in the NPPF and in the Letwin Review.

- 2.36 In relation to the new settlements, the Council assumes delivery on these sites will be at times 1,200 dwellings per annum collectively, equating to annual delivery of 600 dwellings per annum per site. This is highly ambitious. Nationally sites of over 2,000 dwellings only deliver on average 160 dwellings per annum. The Council's trajectory however sets out an annual delivery rate average of 380 dwellings per annum from commencement of delivery of units in 2030/31 up to 2039/40 - in excess of double the national average for similar sites over 2,000 units. It is considered highly unlikely these anticipated rates of development will occur, particularly during the Plan period. The peak delivery of 600 units per site from 2037/38 is also considered highly ambitious and not reflected in delivery rates of other similar sites nationally, let alone within Bedford.
- 2.37 To ensure a sound Plan allocating suitable shovel ready sites in sustainable settlements such as Sharnbrook to deliver in the early part of the Plan period will lessen the reliance on complex sites to deliver in the latter stages of the Plan (including the NDP allocation) bringing delivery targets down to more reasonable and deliverable levels throughout the Plan period. This revised approach would enable the Council will deliver more homes in the short term, securing jobs and helping to slow the inflation on house prices. There will be further social benefits through the delivery of affordable housing at a time when there is an acute need. It will help maintain the viability and vitality of existing settlements and ensure choice and competition in the market for housing assisting delivery and market absorption. It will also ensure the Council can maintain a five-year housing land supply; which currently looks to be marginal even on adoption, if it can be demonstrated at all. This approach is a fundamental risk as the Plan cannot be found sound if there is no five-year housing land supply at adoption and will weaken the plans effectiveness if Paragraph 11 is regularly engaged. Allocating sufficient sites to ensure a robust five-year housing land supply at adoption and throughout the Plan is therefore considered to be a fundamentally benefit as the Plan cannot be adopted or reasonably function without it.

Policy DS5(S) Distribution of Growth

- 2.38 Emerging Policy DS5 sets out where growth is to be located. It takes into account existing commitments together with the additional growth required to meet needs to 2040.
- 2.39 Emerging Policy DS5(S) sets out the following distribution of housing growth:

Location	Dwellings	Employment Land (ha)
Within the urban area	1,200	5
Strategic locations adjacent to the urban area which contribute to delivering the Forest of Marston Vale incorporating the Bedford Milton Keynes Waterway Park and the Bedford River Valley Park	1,500	7
Growth locations on the A421 transport corridor and with the potential for rail based growth		
- South of Bedford including new settlement (land parcels at Wixams, Shortstown and Elstow)	7,050	70
- Little Barford new settlement	3,800	4
- Other employment sites	-	50
Some development will take place beyond the plan period	400	
Remaining rural area / villages (including Harrold)	Completion of sites previously allocated in local plans and neighbourhood plans	

- 2.40 As detailed in response to Policy DS2 it is considered that the Council's preferred strategy is over reliant on strategic sites and new settlements and is not sound. The approach proposed risks the delivery of the Plan as it is highly vulnerable to delayed or non-delivery. If one of the strategic sites does not deliver than the Plan will fail. Further, the approach adopted by the Council does not provide for choice and competition in the housing land market, which is likely to result in land price inflation given most the new housing is under the control of a limited number of landowners. Moreover, it largely rules out developments being brought forward by SME housebuilders, instead creating a monopoly of sites which can likely only be delivered by the larger housebuilders who will benefit from the economies of scale. As a result, there will also be a limited variety of houses realising to the market concurrently, slowing market absorption which will have high consequences in the latter years of the Plan period in terms of satisfying the Housing Delivery Test or demonstrating a five-year housing land supply.
- 2.41 The Plan states that there will continue to be growth in villages as a result of policies in the Local Plan 2030 which allocated growth to some Key Service Centres and Rural Service Centres however, no new/additional allocations are made in these villages in the Local Plan 2040.
- 2.42 The Plan instead advises that some Parish Councils may 'choose' to allocate further sites for development in their Neighbourhood Plan; there is no requirement for this.

- 2.43 This absence of small and medium growth in the rural villages, particularly Sharnbrook, misses an opportunity to deliver some of the housing requirement earlier in the Plan period, rather than relying on some 10,000 dwellings to be delivered through new settlements - which are significantly reliant on the delivery of large-scale infrastructure. As detailed in response to Policy DS3 it is not an appropriate strategy to place such a reliance on strategic infrastructure to deliver such a large proportion of a housing need.
- 2.44 The distribution of growth within the LP2040 is **not effective**. As detailed in response to Policy DS3, such a reliance on strategic sites is not deliverable over the Plan period (it is already noted in Policy DS5(S) that 400 dwellings will be delivered beyond the plan period, before accounting for any delays in site assembly, unlocking and delivering the required infrastructure, and actually delivering homes on sites included within the plan period). Moreover, the failure for Sharnbrook to deliver any new housing, with all growth being funnelled to a free-standing new settlement is entirely at odds with the adopted Local Plan and also fails to utilise a key sustainable settlement with latent capacity for growth (as demonstrated by the allocation of 500 units to Sharnbrook itself in the adopted Local Plan). As such capacity exists and should be recognised and utilised for housing growth in Sharnbrook itself.

3 Land at Kennel Hill, Sharnbrook – Site Assessment

- 3.1 The Housing and Employment Land Availability Assessment and Site Assessment Topic Paper (May 2022) includes the Council's assessments of the sites submitted for consideration throughout this Local Plan process.
- 3.2 A copy of the assessment for Land at Kennel Hill, Sharnbrook is provided below, with our suggested amended assessment where relevant which is based on technical assessment that have been carried out. As set out previously the site has historically been accepted by the Council as suitable for allocation, and would likely have been allocated had the Neighbourhood Plan approach correctly been rejected through its examination.

Criteria	Council's Assessment	Applicant's Amended Assessment
Within or adjoining UAB SPA or built form of a small settlement?	X	+ The site adjoins Sharnbrook and has a significantly better relationship with the settlement than the NDP allocation. The site however benefits from both a good physical relationship with Sharnbrook and being spatially well located to also access services and facilities provided within the new settlement.
Accessible on foot to a food store?	++	++
Accessible on foot to a primary school?	++	++
Accessible on foot or by bus to a major employer?	X	X
Outside, adjoining or within the air quality management area?	+	+
Within or adjoining site of nature conservation importance?	+	+
In an area where protected species are known or likely to exist?	X	? No known species on site. Full ecological surveys will be completed in due course.
Potentially able to achieve a net gain in biodiversity?	?	+

Criteria	Council's Assessment	Applicant's Amended Assessment
		There are opportunities to provide a net gain in biodiversity and the levels achievable on site are currently being explored. It is considered that the site will be able to deliver the 10% required, if not greater.
Able to link into the green infrastructure opportunity network?	0	0.
Likely to impact on an area currently providing ecosystem services?	+	+
Proposing a renewable energy scheme or extra energy efficiency standards?	0	+ There is potential to incorporate renewable energy and energy efficiency measures through the scheme, particularly in light of the new building regulation requirements.
Likely to impact on designated or non-designated heritage assets or their settings?	X	0 No evidence to suggest with sensitive design that there will be any undue impact on a historic asset.
Likely to increase future economic and employment opportunities?	0	+ Jobs will be created during the construction and sale phases.
Proposing a main town centre use in, on the edge or outside of a town centre?	0	0
Within 400m of an existing open space or proposing open space within it?	X	+ There is obvious potential for public open space to be provided on site. Provision to be made on new settlement which is within close proximity.
Within 800m of a sports facility or proposing a sports facility within it?	X	0 New provision being made as part of new settlement.
Likely to have a significant adverse impact on the surrounding landscape?	?	? Landscape assessment confirmed proposed residential development on the site will not

Criteria	Council's Assessment	Applicant's Amended Assessment
		result in significant harm to the wider landscape character or visual environment.
Within the existing settlement form?	X	+ Site adjoins Sharnbrook and forms a logical development parcel
On previously developed land?	X	X
On best and most versatile agricultural land i.e., grades, 1, 2 or 3a?	?	?
Within a groundwater source protection zone?	+	+
At risk of flooding?	XX	+ Site contains areas of Flood Zone 2 and 3, however these areas will form part of the sites open space/ecology/landscape strategy and will not contain built form, which will be restricted to the areas of the site within Flood Zone 1.
Likely to provide a mix of housing, including affordable housing?	+	+
Able to address a particular housing need?	X	? Opportunity to meet specific needs on the site.
Within 800m of a facility where cultural or social activities can be accessed?	+	+
Likely to encourage social cohesion?	0	+ The development would contribute to and expand on an existing community and would raise opportunities for social interaction.
Likely to help make the area safer?	+	+
Connect highway without constraint?	+	+
Highway or junction capacity issues	?	+ No known highway or capacity issues. New settlement providing

Criteria	Council's Assessment	Applicant's Amended Assessment
		improved link with the A6. Site walkable to services and facilities within Sharnbrook and new settlement.

3.3 With the above in mind, it is clear that Land at Kennel Hill, Sharnbrook is better suited to come forward for residential development than actually assessed by the Council, despite the historic draft allocation. The site can come forward early and can be used to replace lost supply in Sharnbrook in the initial years of the Plan period (when a sensible trajectory for the delivery of the new settlement is adopted), enabling a sensible lead in time for the new settlement, which will then in turn provide local growth later in the Plan period, closer to 2040 (albeit concerns relating to freestanding nature of the settlement remain).

4 Conclusions

- 4.1 This representation has been prepared on behalf of Anwyl Land in respect of their land interests at Land at Kennel Hill, Sharnbrook.
- 4.2 To conclude:
- The LP2040 is **not consistent with national policy** because it does not plan for sufficient housing to meet future needs and does not proactively plan for any uplift as a result of the Arc Framework.
 - The distribution of growth within the LP2040 is **not effective or justified** as the level of growth expected on the strategic sites, particularly the new settlements are not reflective of historic delivery within Bedford or nationally when compared to other similar sites. The Council has assumed delivery rates of up 600 dwellings per annum on the Kempston Hardwick and Little Barford allocations (1,200 per annum in total), equating to an average annual deliver of 380 dwellings per annum on strategic allocations (760 dwellings per annum in total), wherein evidence suggests average delivery closer to 160 per annum per site is likely to be deliverable (320 per annum in total), having a significant impact on the deliverability of the proposed stepped trajectory.
 - The Spatial Strategy is **not justified** because it has not fully taken account of all the reasonable alternatives. There is also no justification for not including a requirement for neighbourhood plans to make allocations beyond those already committed to 2030. Role of Sharnbrook underutilised given all local development directed to independent new settlement meaning non of the 500 dwellings will be delivered within Sharnbrook itself. Opportunity for Sharnbrook to actually receive housing allocations as part of updated strategy.
 - It is considered unlikely that the Council can demonstrate a robust five-year housing land supply at adoption, nor throughout much of the Plan period, even if the hyper ambitious assumptions made by the Council are realised. Opportunity for growth at Sharnbrook to mitigate early shortfalls (particularly when sensible and deliverable build rates are adopted in respect of the Sharnbrook NDP allocation).
 - Land at Kennel Hill, Sharnbrook is a suitable site for development and should be included in an **uplift of housing growth** beyond that already proposed in the LP2040 and to realise the spatial role of Sharnbrook itself within the adopted and emerging hierarchy. This uplift should comprise of **sustainable growth** to allow housing to be delivered earlier in the plan period, balancing growth throughout the Plan instead of the back loaded approach advocated by the Council.
- 4.3 We politely request that we are kept informed of the progress on the LP2040 including the need to attend any relevant Hearing sessions for the Examination of the Plan.