



Bedford Borough Council – Local Plan 2035 Consultation Paper Response Form

Please use this form to respond to the questions raised in the Local Plan 2035 Consultation Paper. It should be read alongside the consultation paper and technical documents referred to; copies of the documents are available to view on the Council's website at www.bedford.gov.uk/localplan2035 or in hardcopy at our Customer Service Centre (at 2 Horne Lane, Bedford MK40 1RA) and all libraries in the borough during normal opening hours. Documents are also available at Rushden, St Neots, Biggleswade and Flitwick libraries outside of the borough.

Please send your response electronically if possible or as a WORD document via email to planningforthefuture@bedford.gov.uk.

Alternatively responses can be sent by post. Please attach a stamp and send to:
Bedford Borough Council,
Local Plan 2035 consultation,
Planning Policy Team,
Borough Hall,
Bedford, MK42 9AP

PLEASE DO NOT SUBMIT COMMENTS IN MORE THAN ONE FORMAT OR SEND TO MORE THAN ONE EMAIL ADDRESS. If you have submitted comments electronically you do not need to print and post them.

All responses (electronic and paper) must be received by 5pm on Friday 9 June 2017.

Your contact information will be kept on the Planning Policy database so that we can keep you up to date about this and other planning policy documents. We do not share contact details with other parts of the Council or other organisations. If you do not want your details to be retained (which would mean no further updates from us about the Local Plan 2035) please let us know by sending an email to planningpolicy@bedford.gov.uk.

All responses will be made public.

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If you are using an agent, who would you prefer any correspondence to go to?

(Please mark X one box only)

Contact agent Contact client Contact both

Your interest (Please mark X one box only)

Land owner Resident Consultant Agent Other

Please specify 'Other' (please write in)

Response submitted on behalf of Pavenham Parish Council

QUESTIONS

1a) Do you agree or disagree that one or more of the four new settlement proposals should form part of the development strategy? (Please mark X one box only)

Agree Disagree

1b) If you disagree, 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? (Please write in)

- (i) *It should be noted that Pavenham Parish Council's answer to this question should be recorded only as a qualified "Agree".*
- (ii) *The difficulty for any party responding to this latest Borough Council consultation is understanding and knowing whether the Borough Council's housing needs estimates are correct. It is noted that the CPRE suggest that the Borough has over-estimated by some 4,000 plus homes, whereas the planning consultants for one of the new settlements (admittedly with its own client driven agenda) has suggested that the Borough Council has under-estimated housing need.*
- (iii) *That said, with the threat of potential additional housing being imposed on the Borough from Luton and London – and it is noted that the Borough are worryingly silent on this aspect of their proposals*

both in terms of likely numbers and what could be carried by the Borough's neighbouring authorities – some form of "new settlement" within the Borough in its widest sense, is probably unavoidable.

(iv) Pavenham Parish Council would suggest, however, that the Borough Council – both Members and officers - are being more than a little disingenuous by describing the four potential sites as "new settlements". The reality is that if any one or more of these sites is eventually allocated, consented and then developed, the "new settlement" will to all practical intents and purposes become a "new town" and as a consequence, should be described and assessed as such. The Parish Council certainly agrees with the CPRE's concerns expressed as to the risk of coalescence. See also in this context, our response to Question 12.

(v) Whilst a new settlement in some form may be inevitable - the Borough Council is asked to be honest in its description of any such development and consequent approach to its assessment – so as not to mislead the community. In terms of impact on infrastructure, the environment and neighbouring communities, there is a vast difference between a "new settlement"- a "new town" – a "garden village".

2a) Do you agree or disagree that the brownfield site opportunity at Stewartby brickworks should form part of the preferred development strategy? (Please mark X one box only)

Agree Disagree

2b) 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? (Please write in)

- (i) Again, Pavenham Parish Council has little choice but to rely on the validity and soundness of the Borough Council's housing needs assessment – although it accepts that it has no basis upon which to question its conclusions save in the broadest sense. Accepting the Borough Council's projections, however - and even with a degree of over-estimation - the proposed residential development of the Stewartby Brickworks would be entirely in accord with Government policy that looks to the redevelopment of brown field before green field sites.
- (ii) Pavenham Parish Council acknowledges the difficulties likely to be encountered by any developer of the site in terms of land contamination and the heritage value of the former brickworks buildings - and indeed the Parish Council would support the protection of these historically important buildings. Bearing in mind the success of similar development proposals across the country, however, for example, the regeneration of land adjacent to Kings Cross/St Pancras Stations or the residential redevelopment of Castle Cement's former Pitstone Cement Works in Buckinghamshire, it is presumed that the perceived difficulties would not prove insurmountable.
- (iii) On that basis, the Parish Council would support the allocation of the former Stewartby Brickworks site as a potential "new settlement" and would only query whether, in the context of the Parish Council's comments below, an allocation of more than 1,000 houses would actually be appropriate and feasible?

3a) Do you agree or disagree 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 1,988 dwellings. (Please mark X one box only)

Agree Disagree

3b) If you think that not all of this should be allocated for development where should the development go instead? (Please write in)

- (i) Again, in responding to questions such as these, the Parish Council it is entirely dependent on the reliability of the Borough Council's housing assessment – a point that we will be making on a number of occasions throughout this questionnaire. Putting aside housing numbers, however, and accepting the need for the creation of new housing in the Borough, the Parish Council is very strongly of the view that the Borough Council must throughout the emerging local plan exercise bear in mind the need to maintain a genuine and true separation between town and country – in its most environmental and community spatial sense – in that the existing separation comprises one of the key positive contributory characteristics of the Borough – and indeed the northern part of the County as a whole. Development that would be entirely appropriate for inner urban areas or urban fringe will almost certainly not be appropriate attached to the numerous villages that surround the town of Bedford.
- (ii) On that basis, the Parish Council – at the risk of being accused of nimbyism - would suggest that in order to protect and preserve the character of the Borough both in terms of urban resilience and its countryside strength, new residential development – outside any new town/settlement - should be concentrated for the greater part in the urban and urban fringe areas, where infrastructure can better accommodate the additional pressures. On that basis, the Parish Council agrees with the principle identified by the Borough Council and again must rely on the Council as to the selection of a figure of 1,988.
- (iii) Indeed, based on the interim findings detailed in the Consultation Paper, in the light of the site development “options” identified by the Borough Council, it would appear that additional housing allocations could be made within the urban or edge of urban areas. On that basis, the Parish Council would urge the Borough Council to consider these options in preference to the proposed growth proposed in some of the Borough's villages – subject always to the views of those villages.

4a) Do you agree or disagree with the proposed allocation of urban and edge of urban sites listed in table 1 and table 3? (Please mark X one box only)

Agree Disagree

4b) Are there any sites which you think should not be allocated or any other sites which you think should be allocated and why? (Please write in)

- (i) This should be taken as a qualified "Agree".
- (ii) The Parish Council is reluctant to comment on specific allocations within the urban and edge of urban sites listed in Tables 1 and 3 of the Consultation paper.
- (iii) Apart from the general comment made above with regard to the identification of residential needs and potential allocation in principle of sites in the urban area and urban fringe, the Parish Council does not consider that it is in a position to comment further.
- (iv) The Parish Council would not wish to suggest any additional sites for allocation within the urban and edge of urban areas.

5a) Do you agree or disagree with the amount of development identified for the Group 1 villages as part of the preferred development strategy (2,600 dwellings)? (Please mark X one box only)

Agree Disagree

5b) If not, should the amount be higher or lower, what should the number be and how should the strategy change as a result? (Please write in)

- (i) Pavenham Parish Council is not in a position either to agree or disagree with the Borough Council's proposals in this respect.
- (ii) That said, the Parish Council does have some reservations with regard to the number of houses potentially being allocated for the Group 1 Villages. It expresses those reservations, however, entirely in general terms in that it is not in a position to comment on the specific needs of the Group

1 Villages and it fully acknowledges that some of those villages may welcome the prospect of additional housing and may in fact aspire to more housing whilst others may oppose the Borough Council's potential allocations. This is an issue best left to the Group 1 Villages themselves.

- (iii) As the Parish Council has noted above, however, it does believe it to be critical that the Borough Council does not lose sight of the important part that the villages play in the economic health of the Borough as a whole – as villages per se – and the positive contribution that they make to the complexion of the Borough as a whole. Some of the proposed increases in numbers of houses in the Group 1 villages – if actually taken to implementation and development, could well run the risk of damaging the inherent characteristics of the given village – leading to eventual coalescence - not just to the village's detriment but to the detriment of the Borough as a whole.
- (iv) On a separate level, Pavenham Parish Council is also very conscious that the development of some 500 houses in Group 1 villages adjacent to the village of Pavenham could itself have serious detrimental implications for the Village and Parish of Pavenham itself in terms of highway capacity, increased traffic and infrastructure stress.

6a) Do you agree or disagree with the list of potential development sites in each Group 1 village (tables 4 – 8)? (Please mark X one box only)

Agree Disagree

6b) 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? (Please write in)

- (i) Pavenham Parish Council does not believe that it is in a position to comment on the list of potential development sites identified in each Group 1 village. Again, the Parish Council is content to leave the allocation of such sites – or those that are considered necessary – to the individual Group 1 Villages themselves and the Borough Council – subject to the caveat that Pavenham Parish Council will be concerned to ensure that the village of Pavenham is not detrimentally impacted by development undertaken elsewhere that places pressure on extant infrastructure within or adjacent to the Parish of Pavenham.
- (ii) The Parish Council notes with approval the Borough Council's wish to ensure that, if by the time the draft Bedford Plan is submitted to the Secretary of State in autumn next year, the various Group 1 villages have brought their Neighbourhood Plans to, effectively consultation approval level, the question of actual site allocations can be left to the villages themselves.

7a) Do you agree or disagree with the amount of development identified for the Group 2 villages as part of the preferred development strategy (225 dwellings)? (Please mark X one box only)

Agree Disagree

7b) If not, should the amount be higher or lower, what should the number be and how should the strategy change as a result? (Please write in)

- (i) Similarly, Pavenham Parish Council does not consider itself to be in a position to comment on the number of houses considered to be appropriate for the Group 2 Villages. The Parish Council is very conscious that some of the Group 2 Villages may well believe that no new additional housing is required whilst others may be of a view that a higher allocation would be appropriate for their particular village. The Parish Council believes that this is a matter for the Group 2 Villages themselves – sounding only the same caveat with the Group 2 villages as it has done already with the Group 1 Villages, namely that Pavenham will wish to monitor any housing allocation in neighbouring villages so as to ensure that the consequences of any large development proposed is not likely to place pressure on Pavenham Village's extant infrastructure.
- (ii) Certainly, the Parish Council is not in a position to comment on whether the housing figures identified for the Group 2 villages should be higher or lower although it would wish to record the importance of maintaining village separation, thereby enhancing and protecting the inherent countryside character of the Bedford Borough.

8a) Do you agree or disagree with the shortlist of sites for each Group 2 Village (tables 9 – 14)? (Please mark X one box only)

Agree

Disagree

8b) If not, which sites should be included or excluded from the list? Which sites do you think should be allocated in each village to meet the strategy requirement? (Please write in)

- (i) Pavenham Parish Council does not consider itself to be in a position to be able to comment on the shortlist of sites identified for the Group 2 Villages.*
- (ii) It certainly would not wish to comment as to whether additional sites should be included or existing sites excluded from the list.*
- (iii) As before, Pavenham Village fully supports an emerging Development Plan process that will recognise the importance of the various emerging Neighbourhood Plans and the part they can play in the allocation of housing sites and recognition of housing needs within their respective village.*

9a) Do you agree or disagree with the approach for Group 3 and Group 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)? (Please mark X one box only)

Agree

Disagree

9b) If not, how should Group 3 and Group 4 settlements be treated in the development strategy? Do you have any comments on the wording of the draft policy for Group 3 and Group 4 settlements? (Please write in)

- (i) Pavenham Village is a Group 3 Village and at the time of submitting this consultation response, is in the process of promoting a draft Neighbourhood Plan.*
- (ii) As a result of the emerging Local Plan consultation exercise, the Parish Council intends to put in motion a further consultation exercise within the Village bearing in mind that when the Neighbourhood Plan exercise was originally commenced, every indication from the Borough Council was that it would be looking for the allocation of some 15-20 housing sites within Group 3 Villages, with the bulk of new housing for the Borough concentrated in the south and east of the Borough's administration area.*
- (iii) It remains to be seen how the Parish as a whole will respond to the latest Development Plan proposals, but as a matter of principle, the Parish Council does not disagree with the Borough Council's proposed means of treatment of Group 3 and Group 4 villages in terms of housing allocation.*
- (iv) It is, of course possible, that ultimately the Parish may decide that it wishes to allocate a housing site or sites within the Village or identify specific housing number requirements so as to meet identified or anticipated needs. It would, however, be premature for the Parish Council to comment further on this particular aspect of its draft Neighbourhood Plan at this stage.*
- (v) Draft Policy** - *In the light of the above, however, Pavenham Parish Council supports the general principle of the Borough Council's proposed draft policy but – subject to consultation within the Village as part of the Neighbourhood Plan process – would request the following amendments:-*
 - **Para. 1:** **Delete** - “Exceptionally” at the beginning of the first line;
Delete – “will” and insert “may” in the second line;
Add after the words - “an identified” - the words “or anticipated”.

These amendments are designed to afford the Parish a degree of essential flexibility as it plans for the future.

- **Criteria: Delete sub-paragraph (i)** - *The Parish Council considers this criterion to be overly prescriptive and entirely inappropriate for the scale of development likely to be contemplated in a Group 3 or 4 Village. That said, if the Pavenham Village determines that it would be prepared to accept a degree of new development within the Village over the Plan period, then it may be that its Neighbourhood Plan will identify a housing needs threshold – above which formal housing need, evidence may be entirely appropriate. This is an issue, we would suggest, best left to the respective Villages and their emerging Neighbourhood Plans.*
- **Delete sub-paragraph (iii)** - *The Parish Council is elected by the local community and is the determining body for the Parish. In purely practical terms, if an application for small residential development is submitted to the Borough Council, although the Parish Council will publish notice of that application before considering it, there will not be time to undertake a formal consultation with the local community. This is not the practice adopted by the Borough Council and the Parish Council cannot understand why the Borough Council therefore thinks that such a practice would be appropriate for Group 3 and Group 4 Villages.*

(vi) As the Parish Council continues to consult upon and draft its Neighbourhood Plan, it will include a policy that reflects the Borough Council's shadow policy. We trust, therefore, that at this early stage, the Borough Council will take the Parish Council's comments above fully into account.

10a) Do you agree or disagree with the selection of Local Green Spaces? (Please mark X one box only)

Agree

Disagree

10b) If not, and given the site assessment work that has already taken place, which sites do you think should be removed from or added to the list? (Please write in)

- The Parish Council notes that the Borough Council have accepted that the Pavenham Playing Fields qualify for designation as a Local Green Space. It does however have some difficulty in understanding precisely why the remaining three sites identified by the Parish Council in response to the consultation of 2015 have been rejected.*
- As the Borough Council is aware, a Local Green Space designation is only applicable where the land is not extensive – which applies to all three of the sites within the Parish which have been rejected by the Borough Council - is local in character, a criterion fully applicable to the three sites - and reasonably close to the community, again equally applicable to all three sites. In addition, the designated site should be demonstrably special for example because of its beauty, historic significance, recreational value (including as a planning field), tranquillity or richness of its wildlife. The Parish Council believes that all three of the rejected sites meet the necessary criteria.*
- Whilst the Borough Council is bound to accept that the garden to the Cock public house within the village probably does not fit the relevant criteria, it is extremely surprised to find that designation has not been accepted with regard to the Spinney, Linnell's Orchard and the area of land on the "Straight" adjacent to the Mobile Home Park.*
- The Spinney** - It is, we suspect, not necessary to repeat the rationale and justification provided to the Borough Council in our response to the earlier consultation – although the Parish Council is happy so to do if it would assist. There is, however, considerable concern within the Village that the Spinney has been rejected, essentially because it is in the ownership of the local authority and the earlier protection afforded to the Spinney, namely the protection of the trees by means of a tree preservation order has since been withdrawn.*
- The Spinney, albeit wooded – in the Parish Council's view falls fully within the definition of a Local Green Space as provided by the National Planning Policy Framework and the Parish Council does query whether the Borough Council has over interpreted that definition applying an overly stringent test.*

- (vi) **Linnell's Orchard** - Similarly, with regard to Linnell's Orchard, the Borough Council appears to have ignored the fact that the site lies immediately adjacent to a County Wildlife Site and lies at a critical infrastructure pinch-point within the Village where there is no footway on either side of the road way - as noted in the Parish Council's original representations and as such makes a valuable contribution to the village.
- (vii) **Mobile Homes Park land** - , the failure of the Borough Council to recognise the value of the land in front of the Mobile Home Park and the recreational value that it offers, as well as its environmental contribution is a serious matter of concern within the Village.
- (viii) The Parish Council will be bringing forward the potential for these designations in its emerging Neighbourhood Plan and will in due course wish to discuss its proposals with the District Council. This consultation exercise therefore is a timely, in the view of the Parish Council, in that we would be extremely grateful if the Borough Council would reconsider its refusal to designate the Spinney, Linnell's Orchard and the Mobile Park Land as Local Green Spaces in the context of both the Parish Council's earlier representations as supplemented by our comments above.

11) Do you have any comments on any of the updated or new evidence base? (Please write in)

- (i) Pavenham Parish Council's answer to question 10 draws attention to the fact that in its view the Borough Council has interpreted the definition of Local Green Spaces as promulgated by the National Planning Policy Framework on an overly strict basis which of itself runs counter to the principle objective of Local Green Space designation, namely protecting valuable green areas for future generations within a built up area – entirely in accordance with the "golden thread" that ostensibly runs through the NPPF in terms of sustainability.
- (ii) This is an important issue for consideration for the Village as part of its emerging Neighbourhood Plan. The Parish Council would welcome the opportunity to discuss this issue with the Borough Council at the earliest opportunity so as to avoid any potential conflict between the emerging Local Plan and the emerging Pavenham Neighbourhood Plan.

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 initial appraisal do you have a preference for which settlement(s) the Council should investigate further with a view to allocation? (Please write in)

- (i) Pavenham Parish Council fully appreciates that in the context of the identification of sites for possible new towns/settlements, the Borough Council's discretion has been both restricted and limited in terms of :-
 - (a) Housing need; and
 - (b) Site identification.

In terms of housing need and numbers, as Pavenham Parish Council has already indicated, it is to a very large extent having to rely on the technical housing needs assessments undertaken by the Borough Council. The Parish Council does note, however, with some considerable concern the huge disparity between the numbers identified by CPRE which look to around 14,000/15,000 new houses required during the Plan period and those identified by the planning consultants for one of the would be developers of a new settlement, namely some 22,000+ houses – with the Borough Council sitting somewhere in the middle, towards the upper end at around 19,000 houses - whilst also sounding the caveat that the Borough may need also to increase that figure to accommodate the housing needs of Luton and London.

The Parish Council is bound to query whether the Borough Council is actually in a sufficiently advanced position in terms of housing needs analysis to take any of these

proposals forward at this juncture? As a consequence, it questions whether this consultation exercise is in fact premature?

(ii) *In terms of site selection, the Parish Council is also conscious of the fact that the Borough Council has effectively selected four sites that to all intents and purposes are the most advanced in terms of being able to demonstrate their ability to satisfy the perceived housing need – and we comment below on the selected criteria in the Council's Assessment paper. Indeed, the Parish Council notes with some concern the significant shift in the latest emerging Local Plan Consultation which looks to a concentration of new housing in the north of the Borough whereas only a few years ago that new housing provision was directed to the south and east of the administrative boundary.*

The Parish Council would be grateful if the Borough Council would explain this apparent shift in policy direction?

(iii) *As far as the principle of a new settlement/new town is concerned, the Parish Council, if it accepts that the figures published by the Borough Council are correct and certainly it has no grounds for disputing those figures – however high – is forced to accept that a new settlement/town in the Borough is probably unavoidable. This is in addition to the allocation of 1,000 homes on the site of the former Stewartby Brickworks – and the Parish Council has already queried whether this site has capacity to accommodate more than the presently allocated 1,000 houses.*

(iv) *This view has been reached by the Parish Council, however, not on the basis of any wish to support the concept of a new settlement – which has already been noted above, should in reality be termed a new town because that is what the development will eventually become – but because in accepting the promotion of a single new settlement, the Borough Council will hopefully be able to protect and, if possible, reduce the housing allocation in those villages that wish to restrict additional development within their settlement boundaries.*

(v) *In this context, the Parish Council fully accepts that some villages may wish to expand in terms of housing delivery and it is not for Pavenham Parish Council to comment in that respect. The Parish Council does, however, ask the Borough Council to recognise the importance of the separation of villages, the protection of open and green tranches of land in the north of the Borough and the criticality of retaining the character of North Bedford's extant villages in terms of both historic and environmental context.*

(vi) *As far as the **"New Settlement Assessment Framework Methodology and Initial Site Assessment"** Report is concerned, the Parish Council acknowledges with thanks the clarity of this report and in so doing recognises the difficult position in which the Borough Council has been placed. Whilst accepting the basis for the appraisal criteria that have been identified – and which the Parish Council is not in a position to dispute – it is noted that in the **Background Introduction** at paragraph 1.4 reference is made to the term "a quality garden village". The Parish Council fully appreciates that National Government of necessity attaches a variety of descriptive "labels" to these large new residential developments, but as has been noted throughout this response, we do feel that it is disingenuous to describe any of the proposed four sites as presenting as a "new settlement", nor indeed can they be can termed by any stretch of the imagination, as a "garden village".*

(vii) *This of itself raises some concerns with regard to the selection criteria namely:-*

- **"Integrated and accessible transport systems"** – *this must be an essential criterion for any proposed large new town within the Borough and the Parish Council notes with some concern that two of the potential sites in particular are far removed from the established national rail network.*

- **"Discrete settlement not an extension of an existing town or village"** – the Parish Council fails to comprehend how the Borough Council can realistically contemplate the allocation of a site capable of accommodating some 6,000 homes which does not of itself lead to the coalescence of existing settlements. The Parish Council agrees with the Borough Council that such coalescence must be avoided – but on that basis queries whether any of the currently four proposed sites meet this essential criterion?
- (viii) **Showstoppers** - This therefore leads to the question posed in paragraph 2.3 of the Assessment Paper, namely that the Council may come to the conclusion in the appraisal process that for one or more of the sites there is a "showstopper". The Parish Council notes that some of the key questions identified by the Borough Council in the context of potential showstoppers include:-
- Are there any serious site-wide issues that would make the location of the site undesirable for development that cannot be successfully mitigated? and -
 - If there is no reasonable prospect that the site could be available and could be viably developed at the point envisaged in the Plan?
- (ix) **East-West rail** - In this context generally, the Parish Council's notes that in identifying the selection criteria under the heading of "Integrated and Accessible Transport Systems" specific reference is made to - "the possibility of capitalising on East/West Rail and/or segregated mass transit corridors along existing highways".
- (x) It is with some concern, therefore, that of the four sites selected for further appraisal two, namely Twinwoods and Thurleigh fail this test which the Parish Council would suggest should constitute a "showstopper".
- (xi) **Delivery Agreements** - The Parish Council supports the local authority's intention to make delivery agreements a pre-condition bearing in mind the blatant failure of Wixams to deliver.
- (xii) **Cumulative impact** - The final point the Parish Council would make at this stage in relation to the Assessment paper concerns paragraph 2.8 namely that the Borough Council - "will also have to consider the benefits and dis-benefits of pursuing a strategy with more one than one new settlement and appraise the different combinations of potential new settlements in a similar way that the individual appraisal was made. In this scenario, a cumulative impact on infrastructure and utilities and services may require investigation."
- (xiii) The Parish Council fully acknowledges the complexity that would arise should it be necessary to appraise the benefits and dis-benefits of more than one settlement cumulatively and in combination during the next stage of appraisal. The Parish Council is concerned, however, that the means by which the selected criteria have been applied to the possible "new town" sites has effectively pre-empted the choice of sites – thereby excluding a number of sites which merit further consideration – particularly those lying or likely to lie on the East/West Rail corridor. The Parish Council does query whether the methodology applied rather confuses the Borough Council's stated aspiration to avoid coalescence and promote the growth of existing centres outwards?
- (xiv) Indeed, the Parish Council does express some concern that the Borough Council has been driven more by the seeming initial deliverability of the four selected sites due to the professionalism of the teams supporting the owners/developers of the identified sites rather than the assessment of the sustainable integrity of all of the potential sites in terms of the Borough's future.
- (xv) For example, the Parish Council is extremely surprised that the Borough Council have failed to identify a site to the east of the urban area which would be able to take advantage in economic and environmental terms, of the proposed Cambridge-Bedford-Milton Keynes-Cambridge railway link. Indeed, it could be suggested that the omission of such an option from the Borough

Council's thinking and eventual site selection short list does of itself render any eventual Local Development Plan susceptible to challenge.

- (xvi) *Similarly, whilst two of the sites identified in the northern part of the Borough, namely Twinwoods and Turleigh may be able to lay claim to the fact that their development would lead to the regeneration and development of brownfield land – the Parish Council considers that such a claim should be viewed as being entirely peripheral to the environmental damage likely to be caused by the development of what are essentially green-field sites.*
- (xvii) *At a recent Pavenham Parish meeting, a principal criticism that has arisen in relation to all three of the sites identified in the north of the county namely Sharnbrook, Twinwoods and Thurleigh, relates to the obvious stress that an additional 4,000 – 6,000 homes will place on the Borough's existing infrastructure – in its widest sense. The Parish Council is fully cognisant of the fact that any would be developer likely to reap the rich rewards of such a large development would be happy to include within its development brief ostensibly lavish proposals to meet the potential highway and infrastructure problems, new dual carriageways, bypasses etc. It does seem strange to the Parish Council, however, that certainly two of the sites selected by the Council's officers are probably in the worst possible position in terms of rail connection, and all three in terms of modern communication infrastructure and transport links with the rest of the Borough and indeed the neighbouring counties.*
- (xviii) **Conclusion** - *On the basis purely of making the best and sustainable use of the existing infrastructure, communication links, and environmental preservation, of the four identified sites, Wyboston would be the Parish Council's favoured site. Even then, should the Borough Council eventually identify Wyboston as its preferred site, the Parish Council would urge members and officers to ensure that, insofar as possible, environmental impact must be reduced and the coalescence of existing villages limited to the absolute minimum.*

Overall, the Parish Council is concerned that this consultation document may well have been produced prematurely. The plans and proposals for the four selected new settlements are, at best, provisional and in some cases scarcely commenced. The Parish Council is conscious that by the time the current consultation exercise will have been completed, the reports supporting the new settlements will have been amended improved and will undoubtedly have increased in number.

The decision that will have to be taken by the Borough Council during the course of the next 18 months is so critical for all sectors of the community that the Parish Council would urge the Borough Council to undertake an interim consultation, effectively updating the community on its proposals prior to the publication of its draft consultation plan.