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3<sup>rd</sup> August 2017

Local Plan  
Central Bedfordshire Council  
Priory House  
Monks Walk  
Chicksands  
Shefford  
SG17 5TQ

Dear Sir/Madam

**Re: Harlington Parish Council's Representation on the Draft Local Plan**

The Parish Council considered the contents of the Draft Local Plan at its meetings 24<sup>th</sup> July and 31<sup>st</sup> July, with information from a public exhibition held in Parish Hall, 2-8pm on Tuesday 18<sup>th</sup> July. This exhibition was very well attended and a substantial number of feedback forms were returned. The overarching feeling among residents was against the plans put forward for development in and around Harlington.

Harlington is a village and parish situated between Sundon to the south and Westoning to the north, noted in the Domesday Book still retaining its ancient core and served by narrow village lanes. It is surrounded by countryside designated as AONB and protected from development by Green Belt status. Housing built in the second half of the 20th century has added to the size of the community without eroding its scale and character as a rural village surrounded by beautiful countryside and good quality agricultural land.

Having discussed the residents' responses and the issues within the Draft Local Plan documents, **the Parish Council wishes to object to the Draft as currently presented.** In addition to the following summary, the main points of objection are developed further below:

- new housing development on the scale proposed would erode or even eliminate the character of the village and the quality of life,
- any remaining unmet need for Harlington could be met by an Exception Site to ensure that the right housing was provided to meet that specific, identified need,
- the range and depth of services and facilities in the village is inadequate to serve more development,
- key services notably drainage, health, education, transport and water pressure are already under strain and inadequate for the current population let alone new housing development,
- additional traffic from new development would be incompatible with the narrow lanes that serve the village and render additional new development inappropriate,
- expanding and enlarging the roads, facilities, and services in order to cater for new housing development would damage the character of this village and change the nature of the community from a rural village to a Luton / commuter dormitory,
- there a range of flaws in the Technical documents upon which the Draft Local Plan is based,
- the prospect of new development at Harlington, Westoning and Sundon would be counter to a number of the provisions within the National Planning Policy Framework notably loss of green belt, sprawl and communities merging, and loss of good quality agricultural land,
- the parish council recognises the need for a strong local plan but feels that core provisions and proposals within the current draft require revision,
- the parish council recognises the general development needs particularly for affordable, starter and elderly / semi-sheltered housing to serve the local community,

- the loss of green belt to accommodate new development is unacceptable when opportunities exist within the main urban areas for new / denser forms of development,
- the parish council rejects the proposal to make Harlington a 'minor service centre', this does not reflect the reality of services and facilities provision, and expanding them to serve new development would damage the character of the village,
- the railway line forms a strong boundary on the western side of the village with only one narrow road across it, new development wherever would strain this single crossing point, and the line would 'divide' the community creating an orphan settlement.
- there are a range of existing commitments and applications under consideration for new housing development in and around the village which will stretch existing service, facility and transport provision.

Accidents of history have placed Harlington close to a mainline railway station a motorway junction but these factors are not sufficient to justify new development. There is a duty to protect the village and the quality of life from irrevocable change for the worse.

### Detailed Comments

#### a) Character of the village and the quality of life

Harlington is surrounded by the Area of Outstanding Natural Beauty and land designated as Green Belt. It is a classic 'hill-top' village, situated between Sundon to the south and Westoning to the north, with a heritage derived at least from Domesday. It still retains its ancient core, characterised by narrow village lanes, a cross-roads in the center (with poor sight-lines for traffic), ancient houses and church, and the locations where John Bunyan was preaching, arrested and held before imprisonment. This combination of ancient village surrounded by countryside with nationally designated protections provides a strong rural character. Housing built in the second half of the 20th century added to the size of the community without taking away from the character of the village. The Harlington 1960 - 1970 homes were built by Pearce and Barker as a Model Village. Bungalows and chalet houses intended to follow the hills etc. without dominating - lots of amenity areas with trees and also street trees etc. Extensions to the fronts of these houses have not been permitted in order to maintain the street scene and keep the integrity of the 'village'. The proposed development around Harlington would be damaging to the character of the village altering it irrevocably. The increase in traffic, congestion, noise and pollution from the additional homes would erode the quality of life, and such large-scale expansion would lack justification in terms of the local needs. New housing would necessitate further growth of schools, shops, GP services etc - changing the character and qualities of the village which make it attractive.

Any remaining unmet need for Harlington could be met by an Exception Site to ensure that the right housing was provided to meet that specific, identified need. The proposed policy that such Exception sites will be delivered alongside Market Housing would not be acceptable. This would, in effect, mean developing Market Housing in the Green Belt - something the parish council is opposed to. As these sites are limited to 10 houses - very few would be available for the purpose for which it was built.

#### b) The facilities in the village are inadequate

The Settlement Capacity Study contains a number of concerning inaccuracies and errors which are identified below. The village has basic facilities - pubs, village hall, schools and a few shops to support the community. However these may be described as 'stretched' to serve the present community with day-to-day needs and thereby reduce the need for travel to access services. Additional development would stretch them further to the point of being inadequate. The Settlement Capacity Study recognises these issues (although the details may be out-of-date, e.g. only one newsagent and there is no regular bus service available in the village) noting "the GP surgery (0.5-day satellite of the Sundon Medical Centre ... ) and a chemist (0.5-day satellite pharmacy). There are two newsagent /convenience stores".

To take one example; education. The Settlement Capacity Study notes that the schools are at capacity. New housing development would require the schools to be expanded, with a consequent requirement for more parking (as a minimum for staff, disabled, deliveries) as well as an enlarged school-gate 'drop-off' arrangement. This expansion would in turn exacerbate problems of access through the narrow village roads, parking problems when parents need to visit the schools, noise, disruption and pollution. In the case of the Upper School any such expansion would seriously compromise the management of the school. Furthermore it would compound the impact on the immediate school vicinity, and transport within the village and wider area would be affected. In relation to the Lower School, the proposed doubling of the size of the Lower School with 2 FEs is just totally implausible. Just one indication that the village is not capable of properly absorbing future growth, the same arguments would apply to health, shopping and community facilities.

c) Key services under strain and inadequate

The chance survival of the railway station (Beeching and other rationalisations) does not justify further development around the village. Harlington lacks adequate infrastructure to support new proposals - as mentioned above the old village lanes leading to and through the area aren't suitable for increases in traffic, nor is there adequate parking at the station.

The village already has problems with drainage and water supply (problems specifically overlooked in the Settlement Capacity Study), adding to these problems with new development makes no sense. Key services for modern life notably drainage, transport, broadband and water pressure are already under strain and inadequate for the current population let alone new housing development.

d) More traffic in narrow roads

Additional traffic from new development would be incompatible with the narrow roads that serve the village and render additional new development inappropriate. Expanding and enlarging the roads, and other facilities, and services in order to cater for new housing development would damage the character of this village and change the nature of the community from a rural village to a Luton / commuter dormitory.

e) Flaws in Technical Documents

Examination of the Technical Documents which support the Draft Local Plan reveals a number of flaws which undermine the Plan's proposals.

i) **Strategic Housing Market Assessment (SHMA)**

The SHMA for Luton & Central Bedfordshire contains a number of areas which lack clarity (contrary to the NPPF requirement policy 159) and therefore diminish the validity of the numbers of dwellings proposed. As such the parish council feels the proposed development in the green belt lacks the 'very special circumstances' to warrant release of green belt land:

- at the outset the study has household projections ranging from 2,590 to 3,110, using a figure in between and the highest estimate for the initial 10 year period,(paras 2.5/2.6)
- paras 2.8/2.9 discuss the population projections using 'assumed migration rates' then acknowledges in Luton that 2003/4 showed a net loss of 3,000 people and a net gain of 2,000 in 2009/10,
- para 2.28 contains a 'health warning' that the scale of adjustment to figures may mean " that the flow data that is recorded for the period may be overstating the actual level of population increase. "
- the section on local circumstances indicates Luton growth of 36,000 over a 20 year period (para 2.46) with more projected for Central Beds (para 2.50/51) however para 2.52 contains acknowledgement the potential level of inaccuracies from the Office of National Statistics.
- The most recent economic activity rate projections produced by ONS were published in January 2006 (para 2.56)
- the conclusions for this part of the Study arrives at figures, qualified by acknowledging 'inaccuracies' and data 'corrections' (paras 2.103-2.105)

ii) **Central Bedfordshire and Luton Green Belt Study**

The findings in this study are contradictory with questionable assessments which undermine both the findings and the integrity of the assessment (see below).

This study assesses land against the green belt criteria, asserting the level of contribution each parcel makes and whether existing settlements should be 'inset' or 'washed over'. The level of contribution was assessed using 'professional judgement' (para. 3.92). The study acknowledges guidance from the Planning Officer Society that "Parcels which fully meet any one purpose make a considerable contribution to the Green Belt." (para. 2.17).

The parish council wishes to dispute the findings that:

- a) the land west of the village (H3) is only deemed to make a relatively strong contribution to safeguarding the countryside from encroachment - extending development across the railway line would be a huge encroachment over such a strong physical boundary to the existing settlement,
- b) that all the land (parcels H1, H2 and H3) only make relatively weak contributions to preventing neighbouring communities from merging, i.e with Westoning, Sundon and the urbanised M1 corridor to the west - these make a strong contribution to prevent merging and development would bring the boundaries of adjoining settlements much closer,
- c) that all the land (parcels H1, H2 and H3) only make weak / no contributions to the setting and special character of historic towns, when it is these parcels that identify the Domesday village as an isolated hill-top community.

The Study finds (Fig 4.5) that parcels H1 and H2 make 'strong contributions' whereas H3 makes a 'relatively strong contribution'. However the Study then contradicts itself by asserting (page 84) that parcels H1 and H3 make 'a strategic contribution to the green belt' but H2 on the southern side of the village because of its relationship to existing rear gardens, should be put forward to Stage 2 as it 'may therefore make a relatively weak contribution to Green Belt purposes.'

It is also very disappointing to find that despite the Call for Sites requesting submissions of sites with up to 50% in the Green Belt, that every site selected is 100% in the Green Belt.

### iii) Settlement Capacity Study

In its opening paragraph, this study incorrectly portrays the village, its description suggestive of an outlying suburb of Luton:

"a dense network of suburban residential streets containing a mixture of relatively modern detached, semi-detached houses and maisonettes."

It recognises "the church and village green are both key features of the village and are within a designated Conservation Area that covers the central area of the settlement" and identifies the physical boundary of the village to the west by the railway line.

The Study refers to "The settlement is surrounded by Green Belt land" but fails to mention a truly significant factor, the AONB until later. It adds correctly that "Harlington is significantly constrained by the Green Belt designation that surrounds the entire settlement, and which in the north contributes to preventing the coalescence of Westoning and Harlington."

Worryingly, the Study skates over major problems:

" Sewerage & Wastewater Treatment: The wastewater capacity for Harlington is not known. The National Grid is to be investigated when other technical studies are completed. "

but does recognise

" *Best and Most Versatile Agricultural Land*: Harlington is surrounded by arable land, with a large area of Grade 2 agricultural land located in the west of the settlement".

However in conclusion, the Study appears to state that the potential for development is 'Medium to High' because

" Harlington Upper school has a large site, and could potentially accommodate up to a further 600 pupils, equivalent to approximately 1,700 to 3,000 homes within its catchment that covers a very wide area and indicating a high capacity."

The summary assumes release of Green Belt land without the very special circumstances required by national planning policy and brushes aside concerns over potential coalescence of villages, makes no mention of loss of good quality agricultural land, and the erosion of the character of the village and quality of life by adding expanded / enlarged facilities and services on top of new development.

Despite the statement in the Study's Introduction "It is important to stress that the study is not driven by a need to identify capacity for a particular level of housing, rather it is an objective study which seeks to determine how much growth could sustainably be accommodated within our existing settlements. " the approach fails its own test of objectivity, overlooking both policy, physical and infrastructure problems, arguing for new development at the cost of green belt land release.

#### f) National Planning Policy Framework

Much within the National Planning Policy Framework leads to a position opposing any substantial new development at Harlington as a rural village surrounded by Green Belt and AONB countryside and good quality agricultural land. The proposals for new development run counter to NPPF policies 79-89 regarding development in the Green Belt and the requirement to demonstrate very special circumstances to justify development. However they also run counter to other NPPF policies:

- The Plan doesn't protect the Green Belt as set out in the Core planning principles,
- The Plan doesn't establish how a 5 / 6-10 year land supply would be established (NPPF 47) or whether a sequential approach would direct development to urban centres and protect rural / green belt areas,
- The Plan doesn't give sufficient potential to conversions from commercial to residential uses (NPPF 51)
- Protecting Harlington's environment and quality of life (NPPF 58)
- The emphasis on minimising pollution and other adverse effects on the local and natural environment, aiming to allocate land with the least environmental or amenity value (NPPF 110),
- Neither does it set a realistic target for use of brownfield land (NPPF 111)
- The Plan needs to have regard to NPPF 112 - the benefits of the best and most versatile agricultural land,
- The supporting documents notably the SHMA lack the clarity of local need required by NPPF 159.

#### g) Need for a strong local plan

The parish council recognises the need for a strong local plan to shape the development needs of the area but feels that core provisions and proposals within the current draft require revision, because development proposals go beyond the 'needs of the area' and the proposals look for easy green belt development rather than re-visiting urban sites within Luton and on its immediate margins.

Much of the growth proposed in the Draft Local Plan derives from adjoining urban centres - Bedford, Luton & Milton Keynes: greater efforts should be focused on accommodating growth within these areas rather than sprawl within adjoining countryside. Harlington Parish Council recognises the general development needs particularly for affordable, starter and elderly / semi-sheltered housing to serve the local community, not to build homes aimed at commuters.

The Parish notes with concern that the Draft Local Plan prohibits communities 'inset' in the Green Belt from using a neighbourhood plan to manage / allocate land for development - restricting this to the Local Plan. Being surrounded by Green Belt and AONB, Harlington recognises the need for careful control of development, however as Village Plans were abandoned once the Parish had completed one, there is little faith in the expensive and lengthy process for Neighbourhood Plans.

#### h) Loss of Green Belt

National Planning Policy Framework Policy 87 states "As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances." The Central Beds Draft Local Plan does not demonstrate 'very special circumstances' and as such development of green belt land should not be within the Plan when there are opportunities to build new homes in existing urban areas or new settlements outside the Green Belt.

The National Planning Policy Framework lays a responsibility on local authorities to protect the Green Belt, once developed such land is lost irrevocably. The Technical documents supporting the Draft seek to explore the possibility of development on green belt land in order to deliver a questionable amount of new housing, aimed at serving not local needs but a poorly defined level of internal migration. Furthermore by expanding villages like Harlington and Westoning, the Draft Plan would go against the key fundamentals of the Green Belt:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

While derelict and unused land remains available in areas such as Luton, Bedford and Milton Keynes, the precious green belt land in Central Beds should remain undeveloped.

i) Harlington as a 'minor service centre'

The parish council rejects the proposal to make Harlington a 'minor service centre'. This does not reflect the reality of services and facilities provision (see the descriptions of limited services and facilities in the Settlement Capacity Study), and expanding them to serve new development would damage the character of the village.

j) Nature and Layout of the village

The nature and layout of the village does not lend itself to expansion. The railway line forms a strong boundary on the western side of the village with only two narrow roads - one which bridges the tracks, the other passing beneath. The possibility of new growth to the north would close the gap between Harlington and Westoning; on the eastern side it would impact on the AONB, development on the southern side would erode the countryside between the village and the motorway services / landfill site and proposed Sundon rail freight interchange. New development on the western side would be separated from the remainder of the village and its facilities, putting strain on this narrow crossing point, resulting in congestion. If this area were to be developed it would be disconnected from the village and become a commuter estate - looking towards the railway station and M1, not integrated as part of the village. As such any new homes would be priced towards commuters and unlikely to be affordable to those living and working locally.

The Draft Plan refers to 'Settlement Envelopes' which would help provide definition to future uses, but these would be published as part of a later stage (March 2018) of little help in this consultation and leaving open the possibility of development areas being introduced after the consultation stage.

k) Existing commitments and applications

There are a range of existing commitments (needs specific list) and applications under consideration for new housing development in and around the village which will stretch existing service, facility and transport provision. The development already planned for the Station could meet Harlington's own development needs in terms of small units and retirement homes and the development in Sundon Road (yet to be started) is intended to provide some affordable units.

It is noted that the Central Beds Draft Plan puts aside any neighbourhood plans pending the progress of the Local Plan. The parish council objects to this approach as limiting local expression of development to meet locally identified needs. The weight attached to Neighbourhood Plans in planning decisions reflects the stage reached, even if they haven't passed the final statutory hurdles of referenda and adoptions.

## **Conclusion**

The Parish Council considers that the rate of growth in the Draft Local Plan is unacceptable, caters mainly for migratory and commuter needs rather than responding to those of local people, and would result in unacceptable loss of countryside and green belt. National Planning Policy is clear, that green belt land should only be developed in very special circumstances: this strength of case is not made in the Plan.

The numbers of dwellings calculated in the SHMA is questionable and there is inadequate emphasis in the Plan on the use of brownfield land. It could be argued that current proposals within Luton - Napier Park and the proposed stadium at Power Court - don't go far enough to deliver new affordable housing within Luton's urban area.

There is a real concern that new housing in the countryside and green belt would be poorly related to existing settlements, priced to deliver profit and unlikely to be affordable to those living and working in central beds. The prospect of commuter settlements poorly related to the rural communities does not respond to the sustainable development required by the National Planning Policy Framework.

Harlington Parish Council looks forward to a strong Local Plan being delivered which responds to these and other consultation responses.

Yours faithfully



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