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CPRE Bedfordshire's initial comments on Bedford Borough Council's (BBC's) "Draft Local Plan 2035 for Submission"

The following is a summary of our initial thoughts on BBC's "Draft Local Plan 2015-2035 for Submission".

It is intended for both CPRE members and non-members who have contacted us asking for our thoughts. CPRE Bedfordshire's detailed and comprehensive final response to the consultation will be submitted to BBC prior to the deadline on the 5th March.

Our comments relate to the following:

- A. Introduction** - This covers the background to this "Draft Local Plan for Submission" and how we believe the Local Plan and the Local Plan process may be impacted by the National Infrastructure Commission's (NIC) plans for the Oxford-Milton Keynes-Bedford-Cambridge Corridor.
- B. "Draft Local Plan 2035 for Submission"** itself and CPRE Bedfordshire's comments relating to the "soundness" of the Local Plan - this can be found from page 4 onwards.

A. INTRODUCTION

A1. A Local Plan of 2 parts

CPRE Bedfordshire is very concerned indeed that this "Draft Local Plan for Submission" is in fact just Part 1 of a 2-Part process that Bedford Borough Council and The Mayor, Dave Hodgson has embarked upon.

We believe that it could work as follows:

Part 1 - The "Local Plan for submission that is currently out for consultation will be submitted to the Government for approval.

Part 2 - An early Review of the Submitted Local Plan 2035 will take place a short while after the "Local Plan for Submission" has been "Approved" by the Government appointed Inspector.

This potential "Review", prompted by the National Infrastructure Commission's (NIC) Report on development along the Oxford-Milton Keynes-Bedford-Cambridge Corridor

including East/West Rail, would result in the number of new homes being substantially increased beyond the 19,000 new homes (**equivalent to 5 towns the size of Ampthill**) currently proposed in BBC's current Draft Local Plan for Submission.

Our concern is evidenced by a number of factors:

- The Mayor of Bedford, Dave Hodgson and the Leader of Central Bedfordshire Council (CBC), James Jamieson are both committed supporters of the NIC's proposals for +1 million homes (20 cities the size of Cambridge), and a population increase of +1.9million people (twice the population of Birmingham), across the Oxford-Cambridge Corridor which is only 80 miles in length.
The Mayor has agreed to this without consulting the people of Bedford Borough.
- CBC have just launched the Submission version of their Draft Local Plan 2035. They have stated that they intend to undertake a "Review" of it 6 months after it is approved by the Inspector in order to take account of the NIC proposals for additional development in Bedfordshire. Their "Review" will include a further +20,000 homes on top of their Local Plan number of approx. 40,000 new homes.
- In his report to BBC's Executive Committee on 10 January regarding the "Draft Local Plan for Submission" The Mayor, Dave Hodgson stated, para 5.34:
"Given the recent report of the NIC and the Government's support for the growth it proposes, future plans are likely to require the identification of additional land for housing and employment.
The Council is likely to be looking for sites of a local and strategic scale".

In the "Local Plan 2035 for Submission" it is stated, para 7.42 "New Settlement Proposals for the future" regarding the remaining 3 potential New Towns in north Bedfordshire:

"...The remaining 3 sites and other strategic scale proposals have potential for allocation in future plans"

- **Bedford South - Following the NIC report last November, large areas of land generically called Bedford South, have been put forward for the development of between 4,500 and 9,000 new homes along the A421 - East/West Rail corridor between Kempston Hardwick and Cardington.**

Despite BBC having had discussions with the developers since at least June 2017, BBC chose not to include this proposed development in their "Draft Local Plan 2035 for Submission".

If this 2nd stage, "Review" of the BBC Local Plan were to happen, the democratic Local Plan process which has so far taken over 3 years, would be in tatters as would The Mayor's commitment to local democracy.

A1.1 Local Democracy

BBC have stated that they are rushing through this Pre-Submission Local Plan 2035 in order to get it ready for submission to the Government appointed Inspector by the end of March 2018 deadline.

The deadline was included in a recent government consultation called “The Right Homes in the Right Places” which suggested that a revised method of calculating new housing numbers would be imposed on LA’s after that date.

The new calculation formula, if enforced by government, would result in the number of houses that BBC would be required to build to be increased from BBC’s housing estimate (SHMA) of 19,000 to around 25,000 over the Plan period to 2035.

Coincidentally, this figure of 25,000 could be achieved with the addition of new homes from the 3 remaining New Towns in North Bedfordshire so far dismissed or, from the “Bedford South” proposals.

Any NIC proposal including these developments would require very little if any public consultation.

We believe that the NIC would not have to follow the same strict rules regarding public consultation that the Local Plan process is obliged to do.

Therefore, by following a 2-stage process, The Mayor and the NIC could force through massive additional housing numbers without consulting the residents of Bedford Borough.

A1.2 Oxford - Milton Keynes - Bedford - Cambridge Corridor

It is now quite clear from statements made by The Mayor Dave Hodgson, that he does not see East-West Rail, or the improvements to the A1, or the Oxford-Cambridge Expressway (which is pretty well completed through Bedfordshire - A421), as any more than a means to massive additional development of both housing and employment land.

In the view of CPRE Bedfordshire, these and other major infrastructure improvements suggested by the NIC should be seen primarily as a means of:

- **Cutting current peak time congestion levels on the primary and rural road networks and railways**
- **Reducing air pollution**
- **Moving to more sustainable modes of transport - East/West Rail**
- **Improving the Quality of Life of the people of Bedfordshire**

Not as a means to encourage 100,000’s of people to migrate into Bedfordshire from elsewhere in the UK and a massive housebuilding programme that will not benefit local people. Massive inward migration will keep house prices high.

B. DRAFT LOCAL PLAN 2035 FOR SUBMISSION
CPRE Bedfordshire's comments

B1. A RUSHED LOCAL PLAN IS A BAD LOCAL PLAN

It is disturbing that crucial long term planning decisions that will affect communities across Bedford Borough are being hastened through in this manner.

In our view the housing numbers and the allocated sites included in the Local Plan are a reflection of this haste.

Hugely important decisions regarding the final route of East/West Rail one of our area's most important pieces of sustainable transport infrastructure in decades, which CPRE Bedfordshire fully supports, have yet to be finalised.

The exact location of the East/West Rail station at Bedford has still not been decided or at least, if it has, we are not being told.

The last thing anyone wants is a repeat of the Wixams station fiasco which has still yet to be resolved.

Will there be a station at Wixams? - We still don't know and yet thousands more homes are planned to be built there over this Plan period.

**B1.2 LOCAL PLAN-CHAPTER 10, STRATEGIC HOUSING MARKET ASSESSMENT (SHMA)
Overall Housing Numbers**

CPRE Bedfordshire does not agree with the full Objectively Assessed Need for housing in Bedford Borough of 19,000 homes (equivalent to 5 towns the size of Amptill).

CPRE Bedfordshire stands by our housing estimate of around 15,000 new homes for Bedford Borough which was calculated and explained in detail in our response to BBC's last Draft Local Plan Consultation in August 2017.

This represents a reduction of 4,000 homes compared to the 19,000 new homes in BBC's "Draft Local Plan 2035 for Submission".

It would mean that the Sharnbrook/Colworth/Souldrop New Town could be abandoned and the massive numbers of homes (500) proposed for each of the Group 1 villages Clapham, Bromham and Great Barford could be reduced significantly.

**B1.3 The housing needs of local people can be met with
just 50% of the homes planned by BBC**

A Freedom of Information Request has established that the housing needs of all the people of Bedford Borough can be met with just 50% of the housing that BBC plan to build.

CPRE Bedfordshire's proposal of 15,000 new homes is therefore more than sufficient for the needs of local people plus a more reasonable level for people migrating into the area from elsewhere in the UK.

B2. LOCAL PLAN POLICY 27 - SHARNBROOK/COLWORTH/SOULDROP NEW TOWN (at least 5,500 homes)

CPRE Bedfordshire opposes this development.

The Mayor, Dave Hodgson congratulates himself in his publicity, saying that he has “removed” the previously proposed 500 homes from Sharnbrook and he has - but only to replace them with an extension to their village of at least 4,500 new homes! See page 63 of Local Plan.

Their village of 1,000 homes will now become a New Town of at least 5,500 homes, +25% larger than the town of Ampthill and around 40% larger than the town of Higham Ferrers.

We think that The Mayor is being disingenuous - as he is when using the phrase “Garden Village” to describe the proposed New Town.

CPRE Bedfordshire is opposed to this New Town for the following reasons:

- **Unsustainable New Town location** - in the countryside far from the workplaces of most people. It will be built almost entirely on green countryside and farmland.
- **Adversely impact local countryside and important woodland areas.**
- **New Station (if required?) should be located near to Rushden** to benefit the Wellingborough/Rushden/Ilchester conurbation which has been identified by Northamptonshire as a “growth area”, not in the middle of the countryside.
- **Massive addition to vehicle movements (car & commercial)** - In a rural environment an average of 1.5 to 2 cars per household can be expected so around 9,000 additional cars from the New Town.

New station - a new Parkway station with car parking spaces for 1,000 vehicles planned - so an additional +2,000 daily vehicle movements (minimum) due to this facility alone.

- **Massive increase in traffic (car & commercial) on poor East/West rural road network** Mostly quiet narrow rural roads through small, environmentally sensitive villages. Surrounding countryside some of the most “tranquil” in all Bedfordshire.

To the West & South/West vehicles (car & commercial) will go through Harrold, Odell, Poddington, Felmersham, Turvey, Carlton, Pavenham, Bromham, Oakley etc. with bridges liable to flooding during the winter closing roads. Hugely sensitive Great Ouse Valley.

To the East vehicles (car and commercial) movements will be through the villages of Knotting, Melchbourne, Upper Dean, Lower Dean, Riseley, Swineshead, Pertenhall, Thurleigh, Colmworth etc. and further afield in order to access the A1 and other routes.

- **Large increase in vehicle movements through Sharnbrook** itself with its very narrow High Street - it will be caught in the middle of a deluge of cars coming from all directions!
- **Traffic (car & commercial) will be further increased by the expansion of the “Colworth Science Park”** - additional +7.5 hectares or 20 acres of employment land e.g. offices etc.

- **Insufficient analysis of vehicle movement data by BBC** - poor quality data used by BBC to determine vehicle movement data - no data on commercial vehicle traffic - no analysis of impact on surrounding villages.
- **Network Rail has not confirmed that a station will be located at the New Town**

There won't be a village north of Bedford that won't be adversely impacted by this proposed New Town and Rail Station.

The New Town & Station will also considerably increase the traffic (car & commercial) going into (and out of) Bedford via the A6.
It will therefore also cause increasing problems for Bedford itself.

The council does not need a New Town of this size in this location - even on the basis of its own figures it only needs to find 2,500 homes to conform to its Housing Needs, not 4,500.

The Mayor and the Council he leads should look for alternative solutions which offer, amongst other things, hugely better East/West transport infrastructure and a location closer to the places people want to go to work.

Policy 27 does not conform to the National Planning Policy Framework (NPPF) which requires Local Authorities to plan for sustainable housing development.

B3. LOCAL PLAN POLICY 59S - AFFORDABLE HOUSING

CPRE Bedfordshire supports BBC's Housing Need Assessment which requires 30% of all housing to be affordable housing.

By this we mean affordable rent, social rent and shared ownership.
This level of affordable housing should be implemented on all housing developments no matter where they are located.

However, in addition to an overall percentage of housing developments allocated to Affordable Homes, we would like CBC to specify a minimum content of homes for social rent.

B4. LOCAL PLAN: VISION & OBJECTIVES - RIVER GREAT OUSE & VALLEY AREA

CPRE Bedfordshire is very concerned that insufficient emphasis in the Draft Local Plan is given to highlighting the importance of the Great Ouse Valley both in terms of landscape, biodiversity and its intrinsic value.

Too often in the Draft Local Plan, this great treasure of Bedford Borough's environment (rural and urban), is mentioned simply as a means to achieving some sort of development or another e.g. Policy 45.

The protection and enhancement of the River Great Ouse and valley area needs to be included as one of the "Visions" and "Objectives" of the Local Plan.

It needs to be clearly, firmly and unambiguously stated that the protection of this important feature of the Borough's landscape is one of the top priorities of Bedford Borough Council.

**B5. LOCAL PLAN POLICY3S - AMOUNT AND DISTRIBUTION OF HOUSING DEVELOPMENT IN
KEY SERVICE CENTRES
Clapham, Bromham and Great Barford - 500 new homes each**

CPRE Bedfordshire opposes this Policy

CPRE Bedfordshire believes that 500 new homes for these villages is too high compared to the size of the communities themselves. In the case of Great Barford it would represent a +50% increase in the size of the village.

The decision on allocations has been made on the basis of the minimum numbers needed for a new school or new school year entry without any serious thought being given to the infrastructure issues that developments of this size will have - not only on the community itself but also on the surrounding villages and countryside.

We do not believe that the impact on the villages themselves or the surrounding villages and rural road network has been properly assessed.

B6. FREEMEN'S COMMON, BEDFORD

CPRE Bedfordshire would like to see a new Policy included.

CPRE Bedfordshire together with local residents and action groups fought to prevent the land known as Freeman's Common from being included in the Local Plan as an area for housing development.

Freeman's Common has been in public ownership since the late 1700's.

The Common is a really important 12.5 hectare area of open green space situated on the urban fringe of Bedford near to Brickhill.

We now call on The Mayor and the Council to include a detailed Policy for the long term future of Freeman's Common in the "Local Plan 2035 for Submission".

This Policy should include:

- A commitment to engage with the local community to determine the future use of Freeman's Common.
CPRE Bedfordshire would recommend:
- Opening up Freeman's Common to greater public access.
- Increasing biodiversity through improved long term planting and management regimes.
- Linking Freeman's Common to the nearby Green Infrastructure of Mowsbury Park and Mowsbury Hill Fort.
- Funding for the work should be obtained from Developer "Planning obligations" (S106 agreements) or CIL payments on new homes in and around the area.
External funding is also possible for such projects.

CPRE Bedfordshire is very concerned that without a specific Policy covering Freeman's Common it could still be used as land for development in the future.

This would be a tragedy and a lost opportunity for local residents and the people of Bedford Borough.

**B7. LOCAL PLAN POLICY 59S and other relevant Policies
OPEN SPACE GUIDELINES ON NEW HOUSING DEVELOPMENTS SHOULD BE FULLY
INTEGRATED INTO THE LOCAL PLAN**

CPRE Bedfordshire would like to see a new Policy included

High quality new housing developments of all sizes and in all locations (urban and rural) are dependent on a commitment to incorporate high quality Open Green Spaces that ensure the “Quality of Life” of residents.

Whether these are identified for sport and recreational use, or to enable increased biodiversity, or for use as allotments etc. etc.

BBC has an “Open Space Supplementary Planning Document” (SPD) September 2013 which provides guidance on the amount of Open Space that should be included in all new housing developments depending on their size and population. BBC suggest that the Open Space SPD and the old Policy AD 28 will be carried forward.

Recent experience has shown however that not all recently completed housing developments conform to the guidance laid down in this document.

We therefore suggest that all Policies in the Local Plan covering specific housing developments should clearly state that developments will be expected to conform to the Open Space SPD as a minimum.

Furthermore, we would like to see a specific Policy in the Local Plan covering BBC’s commitment to the inclusion of high quality Open Spaces in all developments.

Urban Area Developments:

CPRE Bedfordshire is particularly concerned to ensure that the Open Space guidelines are fully adopted in all new housing developments proposed for the urban areas of Bedford identified in the Local Plan for regeneration.

It is essential that where high density housing is developed, a clear Open Space policy is closely followed to ensure residents “Quality of Life”.

Developers should be made aware of the need to conform to BBC’s Open Space Policy and should design it into their plans from the outset.

**B8. LOCAL PLAN POLICY 94S - TRANSPORT INFRASTRUCTURE & NETWORK
IMPROVEMENTS**

Cycling - a North/South Sustainable Cycle Path

Despite a dramatic rise in air pollution in recent years, no new major cycling infrastructure has been included in the Draft Local Plan for Submission.

The River Great Ouse as it passes through Bedford has provided our Borough with an amazing “natural” location for the East/West off-road, “Dutch Style” cycle path.

The route has recently been expanded by BBC to include the new housing developments to the west of the town in Biddenham, Great Denham and beyond.

This is excellent and the recently completed cycling/walking bridge as part of the Riverside North project has further improved the facilities for cyclists - connecting the East/West cycle path directly into the centre of Bedford Town.

All, of this will be a major benefit to the regeneration of the town centre.

Our successful neighbours Oxford and Cambridge have high levels of cycling.

If we wish Bedford Borough to become a modern, sustainable community, then we need to emulate this passion for cycling.

**We now need a bold, key-note cycling project
a North/South “Dutch Style” Cycle Path**

CPRE Bedfordshire believes that this should be a completely safe, off-road/protected “Dutch Style” cycle path, stretching from Milton Ernest in the north to the Wixams New Town in the south through Bedford Town centre, by the most direct and fastest route possible.

We urge BBC, as we did at the last consultation, to include this project in their Local Plan 2035.

- It would reduce traffic and air pollution in Bedford
- Encourage families with children to visit the town centre and people in general to commute by bike for work and pleasure.
- The people of Bedford could cycle out into the countryside safely.
- It would improve the health of residents and support Carbon Reduction targets.
- It would encourage the development of more off-road/protected cycle routes.

Several sections of the North/South route are already in place - with “Dutch Style” cycle paths from Milton Ernest to Clapham and from Wixams to the edge of Bedford to name just 2 - they now need to be joined together to form a truly sustainable cycling corridor.

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CPRE Bedfordshire’s submission to the previous Draft Local Plan 2015 - 2035 can be found here:

<http://www.cprebeds.org.uk/news/current-events-2/item/2319-cpre-bedfordshire-s-response-to-bedford-borough-council-s-local-plan-consultation-203>

CPRE Bedfordshire would like to remind readers that responses to past consultations are not taken into consideration when the Inspector comes to review this version of the Local Plan - the “slate is wiped clean” so to speak.

The Government Appointed Inspector will be advised and take note of all comments made to this consultation however so it’s important to submit your comments.

If you wish to speak at the Inspection in Public then please ensure that you make this clear when responding.

Also, if you have registered to speak and have come across new evidence since the consultation you may be able to bring it forward at the Inspection in Public.

CPRE Bedfordshire
5th February 2018