

29 October 2018

CPRE Bedfordshire's Response to Bedford Borough Council's (BBC's)

"Local Plan 2030 Draft Plan for Submission"

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CPRE Bedfordshire would like to appear and speak at The "Inspection in Public" in order to provide more detailed explanations of the objections and comments we have outlined in this response.

Introduction

The following are CPRE Bedfordshire's comments on Bedford Borough Council's Local Plan 2030 Draft Plan for Submission. For the sake of completeness we have kept this as a single document but identified within it the relevant sections of the Plan to which our comments and objections relate.

The issues identified follow the structure of the Plan.

CPRE supports a plan led system and Local Plans which provide a clear framework for sustainable housing growth and employment whilst at the same time protecting and enhancing our countryside.

Good land-use planning is the unsung hero of environmental protection.

It can help slow the growth in road traffic, encourage urban regeneration, curb urban sprawl, protect the beauty and tranquillity of the countryside, and safeguard wildlife habitats. We believe in the benefits of the Green Belt and the intrinsic value of the countryside.

Bedford Borough has some beautiful countryside including the Bedfordshire Wolds and the River Great Ouse and its valley area.

It is our countryside and the "Quality of Life" enabled by it that attracts businesses and people to Bedford Borough and Bedfordshire as a whole.

Poorly planned and excessive development can rapidly destroy the very things that make Bedford Borough such a great place to live, work and do businesses.

We want the right type of development, which we can all be proud of, in the most appropriate locations which will maintain and enhance the very special character of Bedfordshire.

30 years of standing up for Bedfordshire's countryside 1987-2017

CPRE Bedfordshire is the Bedfordshire Branch of the Campaign to Protect Rural England.
Our objective is the protection of the Bedfordshire Countryside and urban green spaces.

We have made extensive representations to BBC's previous Local Plan consultations including the Regulation 19 Local Plan 2035 Draft for Submission consultation.

Our response to that last consultation was dated 7 March 2018.

In this current response we are commenting only on the changes that have been made and any new issues that have arisen. This response should therefore be read in conjunction with the 7 March 2018 consultation response. This is in line with advice given to us by BBC.

1. Legal Compliance

CPRE Bedfordshire is of the view that this Local Plan 2030 for submission is not legally compliant for the following reasons:

1.1. Inadequate Consultation

The consultation processes undertaken by Bedford Borough Council when preparing this Local Plan 2030 will not comply with the NPPF namely:

- NPPF - Core Planning Principles para 17:

*".....planning should:
Be genuinely plan-led, empowering local people to shape their surroundings....."*

- NPPF - Local Plans para 155:

"Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made."

1.2 Local Plan 2030 - Chapter 1 - para 1.6b Reviewing Local Plan 2030

BBC has introduced this revised Local Plan 2030 Draft for Submission to replace the earlier Draft Local Plan 2035 for Submission dated January 2018.

The reasons for this highly unusual and rapid shift in the Council's Local Plan Strategy were several according to BBC:

- To ensure that the Local Plan 2030 was submitted prior to changes to the 2012 NPPF which would have increased the number of new homes that the Council would have had to build over the period.
- In addition, it was stated that a New Town and Parkway Station which was previously planned for Sharnbrook/Colworth could no longer go ahead.
- Furthermore, additional demand for more new homes was being proposed by the National Infrastructure Commission's Oxford - Cambridge Arc proposals.

- The Government had yet to formally confirm their commitment to the NIC project and so the level of government funding for new infrastructure to enable the NIC development plans to go ahead was uncertain.

For these reasons BBC decided to reduce the time span of the earlier Local Plan by 5 years from 2035 to 2030, and urgently submit this Local Plan 2030 for Approval by the DHCLG.

The “new” Local Plan 2030 now contains a new paragraph: 1.6b.

This paragraph states that:

“Due to the changes to national planning policy, in particular the need for the borough to plan for higher housing numbers beyond this local plan, the Council will undertake an immediate review of the local plan once adopted.”

So, we now have a situation where after more than 5 years of various Local Plan variations and consultations with the people of Bedford Borough, this Local Plan 2030 will now be submitted for approval by the DHCLG.

Following this, the Local Plan 2030 will then be subject to a further review process.

However, if by that time the Government has approved the NIC, Oxford- Milton Keynes - Bedford - Cambridge Arc development proposals for +1 million new homes and a population increase of +1.9 million people, then these proposals, as they apply to Bedford Borough, will be considered with a very much lower level of public consultation than in the Local Plan process.

This is because the government will have already partially approved the development proposals as it will be considered to be a “national infrastructure project”.

All that will be left to discuss will be the colour of the road signs.

This is a complete abdication of the democratic process by BBC.

In our view, Para 1.6b has the effect of substantially reducing the democratic rights of the people of Bedford Borough.

By its actions, BBC is effectively removing from the Local Plan consultation process hugely important developments which will have a major impact on the Borough.

Developments like:

- The Sharnbrook/Colworth New Town and Parkway Station
- Twinwoods New Town
- Thurleigh Airfield New Town
- Wyboston New Town

Each with allocations of additional employment land.

And the final route of East/West Rail to Bedford and beyond to Cambridge which will itself impact development decisions.

These have simply been “parked” until the NIC decisions mentioned above have been taken by government.

They have not been removed from consideration as many residents will be given to understand, reading this Local Plan 2030.

BBC have not made this clear to residents.

The result of BBC's decision to review the Local Plan 2030 immediately after it is approved will effectively remove the democratic rights of residents which would have been available to them under the Local Plan process. It is therefore contrary to NPPF paras 17 and 155 described above.

Residents will have every right to be feel deeply let down by a Local Plan process which has lasted over 5 years and has now descended into a shambles.

BBC believe that because they have removed these key and highly controversial planning decisions from this Local Plan, they will be able to say that further massive housing developments proposed by the NIC and endorsed by government are being forced upon them.

This is quite incorrect - in fact, BBC has worked with government to endorse the NIC proposals for +1million new homes (equivalent to 20 cities the size of Cambridge) and a population increase of +1.9 million people (twice the population of Birmingham) across the Oxford - Milton Keynes - Bedford - Cambridge Corridor. These 2 university cities are just 85 miles apart.

It will be the biggest single new conurbation ever created in our country - and the people across the Corridor have never been consulted on it - so much for Local Democracy!

1.3 Change of period of Local Plan from 20 years to 15 years i.e. 2035 to 2030 providing only a short notice period of 6 weeks for consultation.

By changing the Local Plan from a 20 year time frame to a 15 year time frame and giving consultees just 6 weeks consultation - the standard period for a Regulation 19 Pre-Submission Consultation, BBC has provided inadequate time for organisations such as our own and Town & Parish Councils (who have monthly or less frequent meetings) to fully assess the detail of changes that have been made, particularly those regarding demographics and housing numbers.

For example, in the earlier Local Plan Policy S3 which provided the "Amount and distribution of housing development" it was indicated that a minimum of 7,820 new homes would be required and the distribution of this number to the urban area and rural settlements added up to exactly the same number i.e. 7,820.

However this Local Plan 2030 Policy S3 has now changed requiring, due to the reduced timespan from 2035 to 2030, an additional 3,636 homes to be delivered over the Plan period to 2030. However, the total of the urban and rural distribution is 4,355 some +719 homes higher than required.

This is a substantial difference equating to more than the number of houses allocated to a "Key Rural Service Centre" (500).

For small organisations like Town & Parish Councils it is quite impossible to determine and understand the reasons for such differences in a detailed and lengthy Local Plan with many support documents, over a short period of 6 weeks.

The same applies to the housing distribution of 1,000 dwellings allocated to Stewartby a hugely important brownfield site. Here, the number of homes to be completed by 2030 is just 100 units, far lower than that previously estimated in the Local Plan 2035.

In this case after contacting BBC, they have explained the reasons for this change to us but it has taken some considerable time since then for us to research the matter and we have serious issues with their explanation.

These problems would not have arisen before because the Local Plan 2035 had evolved over a significant period of time.

We consider this to be unacceptable.

BBC should have provided detailed explanations to consultees of the reasons for these differences/changes at the time that the Local Plan 2030 Draft for Submission was released for consultation and not left it for consultees to figure out.

BBC should have provided a longer consultation time span.

2. Soundness

2.1 Policy S3 and Policy 25 Stewartby Brickworks New Village of 1,000 homes

Not positively prepared, Not justified, Not effective, Not consistent with National Policy

CPRE Bedfordshire is very disappointed that this hugely important Brownfield site which has been allocated 1000 new homes (a medium sized village) will not be built on until 2029/30 and then only 100 new homes will be built.

That is 10 years after this Local Plan is submitted for approval!

The Government encourages, as one its Core Planning Principles (NPPF para 17), the development of Brownfield (previously developed) land and through a series of Ministerial Statements and Guidance, a “brownfield first” policy which BBC has also adopted.

It is unacceptable therefore that BBC does not see the development of this site as an absolute priority.

By setting development on this site as a priority and pressing ahead with all speed, BBC could substantially reduce the amount of development allocated to green field sites in the rural area and in particular the unacceptably high numbers of new homes proposed for Rural Service Centres.

Whilst we accept that there are some issues regarding the “preparation” of the land to enable development and the distribution of housing around the railway we do not accept that it requires 10 years to resolve these matters.

2.2 Policy 3S Amount & distribution of housing development - Sharnbrook 500 new dwellings

Not positively prepared, Not justified, Not effective, Not consistent with National Policy.

We commented in our response to the Local Plan 2035 Consultation that we were strongly of the opinion that the numbers of new homes allocated to all of the Key Rural Service Centres (500 dwellings) were far too high, representing very large increases compared to the size of the established communities.

We also believe that inadequate assessments have been made of the impact that the proposed housing numbers will have on surrounding villages and the rural environment.

In particular, we are concerned due to the increased traffic that would be encouraged - both car, commercial and HGV through the surrounding villages.

In this Local Plan 2030 the village of Sharnbrook (currently 1,000 homes) has been allocated 500 dwellings - a massive +50% increase in size!

This is a new addition following the decision not to go ahead with the nearby Colworth/Sharnbrook New Town and Parkway Station.

As with other allocations to Key Rural Service Centres, this allocation appears to have 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.

Sharnbrook has a very narrow main street.

It is totally unsuitable for a major increase in traffic that a development of this size will encourage.

East/West routes through the village are narrow and take traffic on to the West through environmentally sensitive villages such as Felmersham, Carlton and Harrold with bridges over the River Great Ouse that flood regularly during the winter causing severe traffic congestion.

These villages have very narrow roads unsuitable for a substantial increase in traffic.

To the east, increased traffic will go through some of the most tranquil parts of north Bedfordshire, such as Melchbourne, Upper Dean, Lower Dean, Thurleigh, Risely and Swineshead.

The primary north/south route is the A6 and this is already very congested at peak times at the key intersections to the north (A45) and south (Bedford western by-pass).

There is no indication in the support documents accompanying this Local Plan that BBC have undertaken a proper impact assessment of the traffic flows that would result from this level of development.

2.3 Policy S3 - Amount and distribution of housing development - Differences in Totals. Split Urban and Rural

Not positively prepared, Not justified, Not effective, Not consistent with National Policy

As mentioned earlier in this response there is a significant difference between the total numbers of new dwellings required to be built in the Plan period in addition to those already in the pipeline i.e. 3,636 and the total shown in the breakdown (items (i) to (vi)) which equals 4,355 a difference of +719 dwellings.

This difference is confirmed in the “Housing Sites Trajectory September 2018” which indicates that a total of 15,270 homes will be built over Local Plan 2030 period.

This represents an excess of +720 homes over the SHMA requirement of 14,550 new homes.

BBC had already built in contingencies to the Local Plan Housing Trajectory so this new introduction in the Local Plan 2030 of a further 720 homes is excessive and quite unacceptable.

720 homes is almost 50% larger than the number of homes allocated to a Key service Centre (500 homes).

The breakdown also indicates that BBC is planning for more dwellings in the rural area than in the urban area.

Since currently the majority of the population (70%) live in the urban area and it makes more sense to ensure that people live as close as possible to their work location this Urban/Rural split seems extremely unusual.

If it is indeed the case, then we believe this to be an unsustainable strategy (see Local Plan 2030 para 7.26) and contrary to the ethos of sustainable development which underpins the NPPF.

2.4 Policy 94 S Transport infrastructure and network improvements

Not positively prepared, Not justified, Not effective, Not consistent with National Policy

It is very disappointing that BBC have still not provided more detail about East/West Rail and the Wixams railway station.

These are really important sustainable infrastructure developments that have been at the heart of recent NIC proposals regarding current and future development across the Oxford- Cambridge Corridor including Bedford Borough.

They will both impact greatly on this Local Plan 2030 and it is unbelievable that full details have been omitted.

CPRE Bedfordshire is very concerned that, despite the fact that Bedford BC has been appointed “Lead Authority” with regard to finalising the precise routing of the Bedford section of the East/West rail line from Milton Keynes to Bedford, the Borough has so far failed to confirm publicly or in this Local Plan, whether the main station for East/West rail will be Bedford itself or a Bedford Parkway station located at, or around, the proposed Wixams station.

CPRE Bedfordshire is strongly opposed to any route for East/West Rail that will take it out to the north of Bedford station “en route” to Cambridge.

We believe that the route south of Bedford through a new Bedford Parkway/Wixams station is the best and most sustainable route.

We note that despite Bedford BC’s stated intention to support a new Wixams station financially, neither Network Rail nor the Department for Transport has agreed to support the Borough’s proposal.

Without this agreement the appalling situation of the Wixams New Town continuing to develop without a railway station is a strong possibility and one which should be avoided at all cost.

These are extremely important strategic issues which are absent from this Local Plan 2030 and have therefore not been the subject of discussion or consultation with local people.

CPRE Bedfordshire

29 October 2018