

Rt. Hon. Alistair Burt MP
House of Commons
London
SW1A 0AA

7 April 2019 sent by email

Dear Alistair

Re: Changes to National Planning Policy - Calculation of Housing Need - Impact on Communities in Bedford Borough and your constituency

We are writing to express our very deep concern regarding recent changes to the method by which Local Authorities are obliged to calculate “Housing Need” in their area and the impact this will have on local communities across Bedford Borough and those in your constituency.

The new “Standard Method” for calculating “Housing Need” was implemented by the Ministry for Housing, Communities & Local Government (MHC&LG) earlier this year following a consultation which ended in December 2018.

This despite considerable concern voiced by many organisations, including our own, which considered it to be deeply flawed for a variety of reasons.

The CPRE National Office’s uncharacteristically strongly worded response to the consultation can be found on the News section of the CPRE Beds website here:

<http://www.cprebeds.org.uk/news/item/2391-cpre-respond-to-government-consultation-on-updates-to-national-planning-policy-and-guidance>

As far as Bedford Borough Council is concerned the new method for calculating “Housing Need” will mean that Bedford Borough Council (BBC) will need to increase the number of homes they plan to build from 970 new homes per year (Local Plan 2030) to a huge 1,300/yr - a massive +35% increase!

However, because BBC presented their new Local Plan 2030 to the MHC&LG for approval prior to 31 December 2018, they come under the “transitional arrangements” which allows them to delay the introduction of these new, highly inflated and unjustifiable housing numbers, until the Local Plan 2030 is updated.

Immediate impact on local communities in Bedford Borough.

It was thought by all concerned, that the “transitional arrangements” referred to above would enable BBC to judge planning applications against their emerging Local Plan 2030 assessment of Housing Need i.e. 970 per year.

Due to an incomprehensible decision by the MHC&LG it now appears, that for the period of time between now (March 2019), and when the new Local Plan is approved by the Government appointed Inspectors and adopted by BBC - expected to be towards the end of 2019, BBC will be required to use the new figure of “Housing Need” i.e. 1,300 new homes per year.

In 9 months’ time, once the Local Plan 2030 is approved by Government, BBC will then be able to revert to the Local Plan 2030 Housing Need of 970 per year!

This completely irrational situation means that as of today, on the basis of 1,300 new homes/year, BBC is unable to show that it has a 5 Year Housing Land Supply. It can only demonstrate a 3.7 Year Land Supply.

See attached copy of BBC’s latest 5 Year Housing Land Supply Report dated March 2019.

Under their Local Plan 2030 housing number of 970 per year they can show a robust 5.8 Year Forward Land Supply.

This is explained in detail in the attached BBC “Briefing Note for Local Councils” circulated a few weeks ago.

If BBC are unable to demonstrate a robust 5 Year Forward Land Supply then it is also unable to defend its current or emerging Local Plan 2030 housing plans from opportunistic planning applications submitted by land owners, developers and others.

You will not be surprised to learn that due to this “loophole” in the legislation, we understand that opportunistic planning applications are queuing up to be considered by BBC for the relatively short period between now and the end of the year when the new Local Plan 2030 is expected to be adopted.

This is causing deep concern in local communities.

CPRE Bedfordshire is aware of opportunistic applications across the Borough in communities such as Harrold, Bromham and Clapham.

We believe that many more applications have been submitted to BBC and are currently under consideration.

As an example - the Harrold application, a highly sensitive site near the lake and close to Little Odell, was originally presented as part of the Local Plan 2030 “call for sites” for 40 new homes.

A formal Environmental Impact Screening Request application 19/00606/EIASCR, has now been presented for “over 100” new homes!

It is the cause of huge concern to local people.

We understand that the site was being considered by the Harrold Neighbourhood Plan group for 10 new homes.

One of 4 sites each of 10 new homes being considered in order to meet their target of between 25 - 50 new homes allocated to them by the BBC’s Local Plan 2030.

CPRE has advocated the Neighbourhood Plan process for many years - allowing local people to have a say in the development of their area - but these decisions by the MHC&LG put this at risk.

Communities such as Clapham and Bromham have been working on their Neighbourhood Plans for the last 2 years and, having consulted many times with local residents, they have identified housing sites for development and their Neighbourhood Plan is nearing completion.

They will be very concerned indeed that all the work they have done will come to nought if these “rogue” applications are approved against the wishes of local communities.

The implications for local democracy are immense - resident’s confidence in the Neighbourhood Plan and Local Plan processes will be destroyed overnight.

We are therefore asking you to please intervene with the MHC&LG on this matter and ask them to reconsider at the earliest opportunity, both the “standard method” for calculating “Housing Need”, and the incomprehensible decision on “transitional arrangements” for BBC and other similarly impacted LA’s.

We would be very happy to meet with you in order to explain our concerns in more detail.

Yours sincerely

Gerry Sansom
CPRE Bedfordshire