



The countryside charity  
Bedfordshire

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Dear Mayor Dave Hodgson,

**Local Plan 2040 and updated government policy statements on planning reforms and the Oxford-Cambridge Arc**

This is an open letter which we are sharing with our members, Parish Councils and the general public.

In our response to the Local Plan 2040 Consultation, CPRE Bedfordshire expressed serious concerns about the impact of government policy on the housing target for Bedford Borough calculated using the government's Standard Method algorithm. We also expressed concerns about the implications of the Oxford-Cambridge Arc Strategy and the assertion in the draft plan that the implications for housing targets in Bedford remained unknown at that time and could not be planned for.

**Planning reforms and the Standard Method**

In our draft plan consultation submission, CPRE Bedfordshire highlighted the comments by Opinion Research Services (ORS) that the Bedford Borough Housing Needs Assessment (HNA - see page 12, para 28) calculated that the housing needs of all the people of Bedford Borough over the 20 year Plan period, including those people expected to migrate into the area from elsewhere in the UK, can be met by building 15,442 new homes over the Plan period, a very considerable difference from the 25,500 proposed in the draft Local Plan.

This was because at the time, through the application of the Standard Method, the government expectation was that a further 8,877 new homes were to be added to the 15,442 to encourage more inward migration into the Borough. As ORS pointed out (HNA – see page 74 para, 6.16) “This level of inward migration is notable ..... The extra 8,877 dwellings represents an increase of 88% over and above the inward migration already included in the most up to date household projection” i.e., 15,442 new homes.

The Borough Council's Local Plan 2040 housing target of 1,275 new homes per year for 20 years is one of the highest of any local authority outside the Greater London metropolitan area and very significantly larger than that of any local authority in Cambridgeshire or Oxfordshire (see attached comparisons at the end of this letter).

In September 2021 Michael Gove was appointed Secretary of State for Levelling Up, Housing and Communities. Michael Gove has told MPs he is looking again at the way housing needs targets are calculated. Speaking in front of the housing, communities, and

local government committee soon after his appointment, he said: “In making a calculation of housing need overall one of the things I wanted to do is to look at how the numbers are generated in the first place. Because I think that some of the assumptions there are probably out of date.” **He also suggested that if local planning authorities believe that their housing targets, as calculated from the Standard Method were too high for their area, they could put their case to his department.**

In February of this year countryside action groups in Bedfordshire took part in a number of protest walks to urge the government to rethink its policy on housebuilding. In a feature in advance of these walks in the Bedford Independent, a Borough Council spokesperson was quoted as saying: *“The Council is required to plan for a number of homes that is set for us by the Government. We believe the number of 1,275 that we have been given is too high, having been based on outdated population forecasts and an unusually high level of recent growth locally. We have and will continue to lobby the Government for this figure to be reduced, however we are obliged to plan for that number.”*

It appears from the Housing Secretary’s remarks that there are new opportunities for the Council to make a case that the figure calculated by ORS in the Bedford Borough Housing Needs Assessment of 15,442 new homes over the plan period, provides a more accurate representation of housing need in Bedford.

If the Council were to be successful in making such a case, there would be no need to develop the sites at Dennybrook and Little Barford where substantial new town developments have been put forward on Grade 2 agricultural land.

- **In the light of the more flexible approach signalled by the Housing Secretary, and the Council’s concern to avoid the prospect of providing significantly more houses than required to meet local need, can you please let us know what steps you have taken, or intend to take, to make the case to the Housing Secretary that Bedford’s housing target for the draft Local Plan 2040 should be revised in line with the original assessment by ORS, rather than to maintain the earlier figure calculated through the Standard Method?**

### **The Oxford-Cambridge Arc**

In December 2021 you reported to Full Council that more detail about the future direction for the Arc was to be expected be known with the publication of the Levelling Up Bill.

Following the publication of the Levelling Up Bill in January 2022, in a statement to the Cambridge Independent on 22<sup>nd</sup> February, Anthony Browne, Conservative MP for South Cambridgeshire, wrote that he was “glad to report that the OxCam Arc appears nowhere in the levelling up White Paper, and is no longer a government priority. Those community groups who fear the consequences of the OxCam Arc on their villages can breathe a little easier.”

Furthermore, in a report to South Cambridgeshire District Council, also on 22<sup>nd</sup> February, Liz Watts, Chief Executive, confirmed there has been a change of approach since Michael Gove was installed as secretary of state, and it has become clear that the government does not wish to see the Ox Cam Arc as a project driven by central government.

**As a result, it will be up to local leaders to identify the priorities they wish to support across the Arc.**

CPRE Charities across the Oxford-Cambridge Arc firmly believe that the decision on which growth option to utilise must be based on environmental and social constraints specific to their locality, the demands of the climate and biodiversity emergencies, and the needs and wishes of local people. They should not be based on notional Oxford-Cambridge Arc targets which have never been subjected to public consultation.

**This being the case, we are concerned that there should be no ‘Arc by Stealth’** and would like your reassurance that current strategic planning for Bedford Borough through the Local Plan 2040 will not be influenced by the uncertain and untested growth objectives of the OxCam Arc.

- **Can you please let us know whether you will be updating the Council on the latest position, and how you will identify any priorities associated with the Oxford to Cambridge Arc Strategy that you intend to put forward for Bedford, in advance of the publication of the next draft of Local Plan 2040?**

Yours sincerely,

Paul Jenkins  
Vice Chair  
CPRE Bedfordshire

**Number of new homes to be delivered per year by Local Authority calculated using the Government's Standard Method Algorithm**

	<b>New Homes Target</b>	<b>Bedford target c/f other LAs</b>
<b>Bedford Borough Council</b>	<b>1275</b>	
<b>Cambridgeshire local authorities</b>		
<b>Cambridge City</b>	<b>658</b>	<b>93% higher</b>
<b>East Cambridge</b>	<b>597</b>	<b>114% higher</b>
<b>Fenland</b>	<b>538</b>	<b>137% higher</b>
<b>Huntingdonshire</b>	<b>976</b>	<b>30.6% higher</b>
<b>South Cambridgeshire</b>	<b>1085</b>	<b>17.5% higher</b>
<b>Oxfordshire local Authorities</b>		
<b>Oxford City</b>	<b>603</b>	<b>111% higher</b>
<b>Cherwell</b>	<b>756</b>	<b>69% higher</b>
<b>South Oxfordshire</b>	<b>608</b>	<b>110% higher</b>
<b>Vale of White Horse</b>	<b>661</b>	<b>92% higher</b>
<b>West Oxfordshire</b>	<b>563</b>	<b>126% higher</b>
<b>North Hertfordshire</b>	<b>973</b>	<b>31% higher</b>
<b>East Northamptonshire</b>	<b>457</b>	<b>180% higher</b>
<b>Kettering</b>	<b>526</b>	<b>142% higher</b>
<b>Wellingborough</b>	<b>348</b>	<b>266% higher</b>

Data source: - Lichfield Planning Consultancy 2020