



The countryside charity Bedfordshire

CPRE Bedfordshire Briefing Document

Bedford Borough Council Local Plan 2040

Plan for Submission - Public Consultation 15 June - 29 July 2022

CPRE Bedfordshire highlights massive and environmentally unsustainable increase in housing targets

This important Public Consultation of Bedford Borough Council's Local Plan 2040 is the final consultation prior to the Local Plan being submitted to government for an 'Inspection in Public' by government appointed Inspectors and their approval.

The Borough Council expects to submit the new Local Plan 2040 to government in January 2023 after taking into consideration the views of those responding to this Consultation.

The purpose of this Briefing Document is to inform Parish Councils, and other members of CPRE Bedfordshire, of our principal concerns regarding the Local Plan 2040 submission version, so that they can take our views into consideration when responding to the consultation, should they wish to do so.

CPRE Bedfordshire's more detailed final response to the consultation will be submitted to the Borough Council later in July and will also be made available to members and to the general public.

Location of housing/industrial development – a positive step forward

The first thing to say is that CPRE Bedfordshire is very pleased indeed that the Council and the Mayor have listen to our concerns, those of our Parish Council members and others with regard to the location of new housing development proposed in the Local Plan 2040.

In this version of Local Plan 2040, the majority of the proposed additional housing development has been allocated along the A421 transport corridor and an attempt has been made to apportion significant areas of brownfield land for development.

This is a very significant step forward, which will limit the environmental impact of future development on open countryside and in particular the hugely important River Great Ouse and Valley Area.

However, our principal objection to the Local Plan 2040 remains unanswered and that is the enormous and unsustainable scale of the housing developments proposed for our Borough which has now been further increased compared to earlier versions of the Local Plan 2040.

In this Briefing Document we take the opportunity to detail once again our very serious concerns and the reasons for them, together with new information which we believe reinforces our arguments.

Housing Numbers – urbanisation on a grand scale

The total number of new homes planned to be constructed over the 20 year period of the Local Plan 2040 is now an incredible 27,100 (1,355 per year) - equivalent to building 7 new towns the size of Ampthill (approx. 4,000 homes) or 27 new villages the size of Sharnbrook (1,000 homes).

The housing growth target in this Local Plan represent one of the largest housing targets ever seen in the history of Bedford Borough Council. The sheer scale of the proposed development will cause enormous damage to the environment in Bedford Borough. Bedfordshire is already one of the most densely populated counties in England and one of the smallest. It will drive a population increase of more than 50,000 people, a 30% increase on the current population of the Borough.

Bedford Borough Council's housing target is larger than that of any of the Local Authorities in the neighbouring and much larger counties of Cambridgeshire or Oxfordshire.

There will not be a location in Bedford Borough that will not be adversely impacted by this scale of development. The additional hard and soft infrastructure necessary to support this level of population increase will be very substantial indeed, right across the entire Borough.

CPRE Bedfordshire ask the question – is this Ox-Cam by Stealth?

Government's Standard Method algorithm for Housing Needs Assessment

This enormous level of house building is driven by the Government's much criticised Standard Method algorithm which is based on outdated 2014 Office for National Statistics (ONS) Housing Statistics.

If up to date ONS data is used from the 2018 Housing Formation analysis, the calculated housing need for Bedford Borough would be similar to the current Local Plan 2030 requirement of around 1,000 dwellings per annum.

Local authorities are obliged by government to use the Standard Method when calculating housing numbers. However, soon after his appointment in September 2021 as Secretary of State for Levelling Up, Housing and Communities, Michael Gove 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.”¹

He also suggested that if local planning authorities believe that their housing targets calculated from the Standard Method were too high for their area, they could put their case to his department.

In reply to CPRE Bedfordshire’s open letter expressing concerns about the impact of the government’s housing target formula for Bedford, the Mayor said that the target is “far higher than we should have to accommodate” and that he had written to the Secretary of State (SoS) asking that the target should be reviewed.

However, when asked by CPRE Bedfordshire to publish the Council’s correspondence with the SoS, the Mayor said it would be unfair to do so, as his letter to the SoS was not sent as an open letter.

CPRE Bedfordshire believe that the correspondence between the Mayor and the SoS contains matters of vital public interest and should be open and transparent and in the public domain. We have therefore submitted a Freedom of Information request in an effort to ensure that this correspondence is available to local people.

Oxford-Cambridge (Ox-Cam) Arc

CPRE Bedfordshire have long maintained that there has been, and continues to be, a lack of openness and transparency about the Borough Council’s attitude towards the ambitions of the Ox-Cam Arc strategy. It appears to us that whilst publicly distancing itself from the massive increase in Bedford’s housing targets, apparently forced upon the Council by the government, the Borough is able to hide its willingness to support the accelerated housing growth ambitions of the Ox-Cam Arc.

Government development proposals for housing development across the Arc (just 85 miles long) were originally stated as to create one million new homes (20 cities the size of Cambridge) and generate a population increase of 1.9 million people (twice the population of Birmingham).

This proposal has never been the subject of public consultation and an Environmental Impact Assessment has not been completed.

CPRE charities across the Arc have been very successful in informing local people of the sheer scale of the Ox-Cam Arc proposals. As a result, the target ambition of 1 million new

¹ <https://www.building.co.uk/news/gove-promises-overhaul-of-out-of-date-housing-need-formula/5114618.article>

homes has become so controversial that government ministers no longer mention it, and in recent months they have tried to play down their ambitions.

The reality though is very different – and this Local Plan 2040 is, in our view, an attempt at achieving the Oxford-Cambridge Arc by stealth, aided and abetted by supportive local authorities. Particularly those like Bedford Borough, where the Mayor has signed up to: “The Oxford-Cambridge Arc Government Ambition and Joint Declaration between Government and Local Partners (March 2019)”

Local Plan 2040 refers to the Joint Declaration in Para 1.7 on page 3 of the Local Plan 2040 submission version where it states that ‘the declaration itself is silent on housing numbers’. This is incorrect!

Para 1.6 on page 11 of the Joint Declaration states quite clearly that:

“In its response to the NIC report, the Government designated the Oxford-Cambridge Arc a key economic priority, affirmed its ambition for up to one million high-quality new homes across the Arc by 2050...”

One million homes is still very clearly an ambition of government and those local authorities that signed it, otherwise the Joint Declaration would have been either modified or discarded by now and neither has happened.

A full copy can be found on the government website here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/799993/OxCam_Arc_Ambition.pdf

We urge the Mayor, as a matter of democratic accountability, to publish this document in full on the BBC website as soon as possible, so that residents can read for themselves precisely what he has signed up to with the Government.

Whilst, as stated above, in his reply to CPRE Bedfordshire’s enquiries, the Mayor maintains that he believes the government housing targets are too high, referring to paragraph 1.7 of the Local Plan 2040 submission version, the Mayor explains that the 40% increase in housing need, calculated by using the Standard Method (1,355 dwellings per annum) rather than current objectively assessed housing need (970 dwellings per annum), meets the Ox-Cam Arc Joint Declaration ambition to deliver 'significantly more homes' across the Arc.

The Secretary of State, Michael Gove MP, stated in recent months that that the government does not wish to see the OxCam Arc as a project driven by central government. Instead, it will be up to local leaders to identify the priorities they wish to support across the Arc.

Despite our request for information about the priorities for the Arc identified by Bedford Council, these remain unclear and, as far as we are aware, have not been discussed and agreed by the Council in a public forum.

Central Area Growth Board – local democracy in crisis

Bedford Council is one of six unitary authorities (Milton Keynes, Central Bedfordshire, Luton Borough, Bedford Borough, West Northamptonshire and North Northamptonshire) which have formed the Central Area Growth Board to determine growth opportunities (including housing growth) across the central part of the Arc.

It is through the Central Area Growth Board that these local authorities are talking to Central Government and making plans about growth options behind closed doors, shunning local democracy.

And, we've discovered, the Growth Board has been meeting for years without informing local people.

As far as we are aware, there continues to be no information about the Growth Board on the Council's website, and so far minutes have only been available through submission of a Freedom of Information request.

Again, CPRE Bedfordshire urges the Mayor to publish full details of the Central Area Growth Board on its website together with full minutes and details of who attended the meetings, including central government representatives.

Residents have the democratic right to know what is happening and to be consulted on the proposals being developed by the Growth Board to deliver, by stealth, on the housing growth ambitions of the Ox-Cam Arc Strategy.

CPRE Bedfordshire believes that a more sensible way forward would be to:

- Develop a National Industrial and Housing Development Strategy which encourages a more equitable spread of development and population growth across the country.
- Prioritise areas that are most in need of job creation, not contribute to the overdevelopment of the already overheated South and South East.

Water & Sewage Supplies to this enormous number of new homes

Bedford Borough already has very serious water supply issues as recognised by the Environment Agency but nowhere in this Local Plan does BBC consider this issue.

It appears from other investigations undertaken by CPRE Bedfordshire, that Anglia Water has plans to alleviate the problem by diverting water from North Lincolnshire, which currently has a surplus, into the rivers of Bedfordshire.

A highly undesirable action, as moving water from a river system with one ecosystem to another different one can cause very significant environmental problems.

It would appear that no one in North Lincolnshire has been consulted on the matter.

Which water area will receive water supplies in the very likely event of a water shortage due to Climate Change – North Lincolnshire or Bedfordshire?

What happens if North Lincolnshire wishes to develop its industrial base?

Isn't this the reverse of the Governments much trumpeted "Levelling Up" process?

The Sewage System in Bedford Borough is also creaking at the seams and in need of massive investment just to keep the current housing stock properly serviced without polluting our River Great Ouse even further. Local Plan 2040 is silent about how this massive number of new homes will receive an environmentally sustainable sewage system.