



The countryside charity Bedfordshire

Bedford Local Plan 2040 Submission Version Consultation

CPRE Bedfordshire Response July 2022

Introduction

1. CPRE Bedfordshire believes in a democratic approach to planning and Local Plans are the cornerstone of our planning system. We commend Bedford Council's commitment to maintaining an up to date Local Plan and the efforts they have made to open up the plan making process for the involvement of local people.
2. There are many aspects of the draft plan that we support. However, the context for the draft plan in terms of national planning policy is complex and problematic. The key objections that CPRE Bedfordshire expresses in this consultation response are very much associated with aspects of national planning policy.
3. The principal objections to Local Plan 2040 put forward by CPRE Bedfordshire relate to aspects of government policy aimed at boosting housing supply. Government ministers have stated that they are unwilling to show flexibility on the impact for Bedford of the government formula of assessing housing need (known as the Standard Method) because of concerns about delivery. However, we believe that these concerns are unjustified when Bedford Council has a record of consistently delivering or exceeding the housing requirement set in development plans in recent years.
4. Bedford Council's strategy on housing growth is set out in the Introduction, the Vision and Objectives, and the Growth and Spatial Strategy sections of Local Plan 2040. The issues arising from this strategy give rise to our principal objections to the plan. CPRE Bedfordshire's views on these areas are addressed collectively in in the first section of this response headed 'Environmentally Unsustainable Housing numbers.'

Environmentally Unsustainable Housing Numbers

5. The Plan provides for 27,100 new homes to be delivered over the Plan period (1,355 per year). This is the highest target in the history of Bedford Council and is equivalent to building 7 new towns the size of Ampthill or 27 new villages the size of Sharnbrook. The result of this would be urbanisation on a grand scale.

6. CPRE Bedfordshire is aware that the Council have made representations to the government asking that the Standard Method derived targets should be revised. A copy of the Council's letter to the Department of Levelling Up, Housing and Communities and the Minister's reply have been obtained through a Freedom of Information request.
7. In their letter the Council states that following the government formula means the Council 'are obliged to plan for an excessive growth rate far in excess of that which the borough can sustainably accommodate.' The Minister's reply states that no flexibility can be shown because they are committed to boosting the housing supply and have concerns about delivery.
8. The Council say that they have no real choice other than to follow the governments expectation that local housing need will be calculated through the much criticised Standard Method formula. The government insists that outdated and inaccurate 2014 ONS (Office for National Statistics) housing formation data must be used even though more up to date and accurate figures were published by ONS in 2018. These result is a much lower housing growth target of around 1,000 new homes per year.
9. It just so happens that the higher target based on the 2014 data is in-line with the Governments Ox-Cam ambitions.
10. Regardless of the fact that we now know that Bedford Council have challenged the government's housing delivery target for Bedford, it is a matter of great concern that an atmosphere of secrecy persists around these matters and this information has only become known due to the submission of a Freedom of Information request.
11. CPRE Bedfordshire is also very concerned to learn that Bedford Borough Council is one of six local authorities which have been meeting in private session for several years to progress the economic growth Oxford-Cambridge Arc Strategy Agenda for the area. As far as we are aware, these meetings of the so-called **Central Area Growth Board (CAGB)**, have never been the subject of discussion at any Bedford Borough Council Full Council Meeting which is open to the public and at which all political parties are present. Through the CAGB, discussions have been taking place with government through informal channels.
12. In May this year Hazel Simmons, council leader for Luton Borough, made an announcement that Milton Keynes Council has agreed to adopt the role of the accountable body for the Central Area Growth Board. Councillor Simmons advised that board members worked closely together last summer to develop a growth prospectus, setting out a range of regeneration and infrastructure projects for the government to invest in under its levelling up and climate change agendas. The prospectus was produced in recognition that the central area was the only one in the Ox-Cam Arc which hadn't received a formal growth deal from the government. Apparently, this prospectus was not progressed by the Secretary of State for the Department of Levelling Up, Housing and Communities.

13. Unfortunately, to the best of our knowledge, information about the prospectus is not in the public domain and we can only speculate about its contents and ambitions.
- 14. CPRE Bedfordshire believes that CAGB discussions with Government are designed to achieve, “by stealth”. The hugely controversial ambition of an additional 1 million homes (20 cities the size of Cambridge) across the Ox-Cam Arc by 2050** as detailed in “The Oxford-Cambridge Arc Government Ambition and Joint Declaration between Government and Local Partners (March 2019),” to which Bedford Council are signatories, but has never published on its website.
15. CPRE Bedfordshire would like to see the following action taken:
- The Mayor and Bedford Council should be taking a far more assertive stance in discussion with government over their Local Plan 2040 Housing Target, making a stronger case for what they consider to be a sustainable housing Target i.e. between 970 and 1,000 new homes per year over the Local Plan period.
 - The Mayor and Bedford Council should clarify and publish precisely what agreements/proposals have been reached by the Central Area Growth Board and government with regard to housing development.

Other comments on the Local Plan 2040 Submission Draft

Vision and Objectives

River Great Ouse and Valley Area – a “Valued Landscape”

16. Para 2.1 CPRE Bedfordshire commented in our initial consultation response that the Local Plan Vision fails to recognise the importance of the "River Great Ouse and its Valley Area" right across the Borough from its point of entry near Turvey to where it exits the Borough in the east. This is a serious omission that should be remedied.
17. The National Planning Policy Framework (NPPF) (2021) Para 174, states that *‘Planning policies and decisions should contribute to and enhance the natural and local environment by **protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).***
18. The NPPF therefore creates the basis for the protection of “valued landscapes” in planning policies and CPRE Bedfordshire would like to see the Council look positively at the opportunity this creates to protect the Great River Ouse and Valley Area right across Bedford Borough. The area CPRE Bedfordshire recommends being recognised as a “valued landscape” would be the same as that designated an Area of Great Landscape Value in earlier Local Plans, prior to this national designation being removed by government.

Climate Change

19. CPRE Bedfordshire commented in response to the Local Plan consultation of 2021 that we would like to see the plan go beyond general statements of intention to work towards making Bedford a carbon neutral borough and build in some stronger and more specific targets in support of this objective.
20. The expanded consideration of these issues in the Submission Draft are very welcome. Policy DS1(S) Resources and climate change sets out a number of ways in which development must support a move towards carbon neutrality.

Transport

Cycling

21. There remains a complete absence of any detailed recognition of the need for a sustainable network of safe segregated cycle routes across the Borough - e.g. North South linking the Wixams (bridging the A421) to Milton Ernest through the centre of Bedford.
22. There is also no mention of a safe segregated cycle route to Bedford Station - it is deeply unsatisfactory that there is still no segregated cycle route to Bedford station from any direction.
23. Cycling is the way forward at a time of Climate Change and Biodiversity Loss - it will significantly improve the health and wellbeing of residents but people do not trust lines on a highway – they do not feel safe.
24. The Council needs to take the bull by the horns, dismiss the gainsayers and move forward at pace with plans for an integrated, safe, segregated network of cycle routes across the Borough, moving the priority away from cars. Our neighbouring cities of Oxford, Cambridge and Milton Keynes are showing the way forward and BBC should move swiftly into the modern era.

Rail Travel - “A Rail Strategy for Bedford” May 2022

25. It is deeply unsatisfactory that BBC has introduced an updated Rail Strategy without any public consultation and without it being discussed and agreed at a Full Council Meeting where councillors of all political parties are in attendance, members of the general public and the media. Like the Council’s previous submission to the East West Rail consultation, secrecy seems to have been the motivation.
26. This paper is a major update of the previous Rail Strategy and in view of the considerable concern regarding the impact of East West Rail on our Borough this document should have followed an open democratic process.

Rail Travel - Proposed site of new Wixams Station reduces East West Rail route options

27. The opportunity to reconsider the route choice and to switch attention from the currently proposed northern route in Bedford to a southern route following the A421

transport corridor, is currently threatened by progress on the development of a new station at Wixams.

28. As far as we understand the location of this station has been identified with other priorities in mind and would be unable to operate as an EWR station interchange with Midland Main Line and Thameslink.
29. CPRE Bedfordshire urges EWR Co to intervene in this development and ask for the project to be paused so that alternatives could be considered which would serve the needs of EWR as well as residents of Wixams.
30. CPRE Bedfordshire strongly supports EWR in principle and would like to see the new railway being progressed and delivered, but only if these major concerns are addressed and EWR Co changes course to focus on a more environmentally alternative route.

(CPRE Bedfordshire has also made these comment to the current Wixams New Station Consultation.)

Horse and Equestrian Activities

31. Para 6.69 - CPRE Bedfordshire values the many positive aspects of horse riding and equestrian activities, but a reasonable balance needs to be maintained between support for these activities and provision for protection of the countryside and the interests of local communities. This new policy is a welcome set of protections that should ensure that the interests of all parties are catered for.

Open Space Standards – Ownership of open green space on new developments

32. In the 2021 consultation CPRE Bedfordshire proposed that all open green space within new housing development should be handed over to Town & Parish Council's for long term maintenance and not held onto by developers who charge residents much higher maintenance costs. There have been many complaints from Parish Council's and residents regarding this practice.
33. We can find no reference in the Submission Draft to any steps taken to remedy this problematic area.

Natural environment policies

34. Policy NE1 –Environmental Net Gain is welcomed but there remains unclear to us how the delivery of biodiversity net gain will work in practice.

Water & Sewage Supplies

35. 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.
36. 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.

37. CPRE Bedfordshire has serious questions about these matters;

- 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?

38. **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.