



The countryside charity
Bedfordshire

Briefing Paper: Bedford Borough Council Local Plan 2040 Examination Stage

CPRE Bedfordshire Statement to Examination Hearings

Matter 3 – Overall housing need

Tuesday 13 June 2023 2.00 pm

Issue: Whether the plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to overall housing need.

Plan policy focus – DS3(S)

Question 1.

Has the calculation of local housing need (27,100 dwellings across the plan period 2020-2040) been undertaken appropriately using the standard method, the correct inputs and up to date evidence?

As far as CPRE Bedfordshire is concerned, the impact of the application of the government's standard method on the local housing needs assessment, resulting in a 40% increase in the target to cater for inward migration, is unjustified and massively harmful. It translates to nearly 8,000 additional new homes over the plan period and would require building at unprecedented rates as far as Bedford is concerned.

The Local Housing Need Assessment undertaken by Opinion Research Services on behalf of the Council (dated May 2021 with the April 2022 Addendum) concluded that 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 977 new homes pa, a very considerably lower figure than the 1,355 homes proposed in this plan, following the application of the standard method.

The impact of the standard method is referred to in the ORS report at para 6.16 p.74 which states as follows – I paraphrase;

the high level of inward migration is notable. The baseline household projection (summarised in Figure 39) suggests a net inward migration of 9,740 households for the 2020-40 plan period (Figure 44 – 3,348 annual inward migration, Figure 45 – 2,861 annual outward migration. $3,348 - 2,861 = 487$ net annual inward. $487 \times 20 \text{ years} = 9,740$), these households would occupy around 10,041 dwellings. The extra 8,877 dwellings for inward migration implied by the standard method, represents an increase of 88% over and above this most up-to-date household projection.

(ORS Addendum page 9 para 22: 977 homes pa adjusted to 1355)

Further explanation of the impact of the standard method is referred to in Local Plan 2040 para 4.7/4.8 p 24, which states:

The standard method approach to setting housing requirements uses inputs taken from population and affordability data. The Council's Local Housing Need Assessment (LHNA) and Addendum demonstrate how these inputs are used to generate both the number of houses required and a dwelling-led population forecast which illustrates how the borough's population would change as new dwellings are delivered. It forecasts that an increase in population of around 50,000 people and in-migration of more than 22,000 people over and above existing trends, will need to take place if dwellings are to be populated at the standard method rate of 1,355 dwellings per year. This represents a 40% increase on the housing requirement of 970 dwellings per year set in Local Plan 2030.)

We had extensive discussions with the former mayor and senior planning officers on this matter over the period of the plan's development. In the course of these exchanges, we discovered that the former Mayor entirely agreed with our position on the impact of the standard method, stating in correspondence and in meetings that he believed the government-imposed target is excessive and unsustainable.

CPRE have also had access to correspondence between the Council and the Levelling up Department through a Freedom of Information request. This shows the Council making the case that on the basis mainly of past over-performance, they were obliged to plan for an excessive growth rate far in excess of that which the borough can sustainably accommodate.

Whilst government ministers stated in reply that it was a matter for local authorities to decide their own housing requirement, they showed no willingness to allow any flexibility on the impact of the standard method for Bedford, apparently because of concerns about delivery.

However, Bedford's record shows that these concerns are unjustified as the Council has a record of consistently delivering or exceeding the housing requirement set in development plans in recent years.

All this when we are led to understand that the government is contemplating a change in policy, with the secretary of state for levelling up saying that the law is going to change and housing targets will become advisory only.

In conclusion, CPRE Bedfordshire's position is that we are completely unable to accept the figure of 1,355 new homes per year based on a wildly exaggerated expectation of levels of inward migration.

The UK ranks amongst the most nature depleted nations on earth. The cause of much of this has been the endless pursuit of growth at any cost that has been followed for many years. We urge the Council to look towards a more environmentally sustainable approach to local planning.

This means turning away from previously stated OxCam housing growth ambitions and focusing on building good quality affordable housing for local people, and the protection and enhancement of the beautiful Bedfordshire countryside, not its destruction. A reasonable level of provision for inward migration could also be included.

Bedfordshire is one of the smallest counties in England but the 13th most densely Populated. Our countryside is precious.

These plans will not make housing cheaper or any more accessible for local people – driving a huge inward migration of people into Bedford Borough will simply increase housing demand and therefore increase the price of new homes and building land. The only people to benefit from this will be developers and landowners.

We therefore respectfully suggest that you think again about the new Mayor's request to reschedule the plan, so that the housing targets in this plan can be revised to more sustainable levels..... and most importantly, find a way of doing this that prevents the Council from being at risk of speculative development by being classified as having an 'out of date' plan in the interim.

We'll keep standing up for the Bedfordshire countryside. Want to stand with us? Sign up now for [monthly news](#) on our work or [join us as a member](#) from just £3 a month.