



# The countryside charity Bedfordshire

## **CPRE Bedfordshire Statement to Examination Hearings**

**Matter 8 - South of Bedford Area - Housing and employment land allocations**

**11<sup>th</sup> & 12<sup>th</sup> September 12.00pm**

### **Issue**

**Whether the housing and employment land allocations in the south of Bedford area are justified, effective and consistent with national policy.**

**Plan policy focus – HOU12 to HOU18**

### **Question 1**

#### **Overarching / Policy HOU12**

- Is the overarching vision for the South of Bedford area supported by appropriate evidence?

CPRE Bedfordshire is of the view that the vision for the South of Bedford Area is not supported by appropriate evidence because the plan's housing target is 'excessive and unsustainable' – terms used by the previous Mayor in correspondence with the SoS for Levelling Up when he made the case in April 2022 that the Council's 2040 plan should be based on Locally Assessed Need and not inflated by the application of the standard method.

We heard from ORS, an independent research body, in the Block 1 Hearing Session on Overall Housing Need, that the rate of housing growth proposed in this plan places Bedford among the very highest compared to other local planning authorities across the country, with a premium on locally assessed need of nearly 9,000 houses added, to arrive at the target of 27,000 houses - the additional housing being added to cater for 'extra inward migration.'

In his letter, the previous Mayor stated that the research undertaken for the Council by ORS demonstrates that a realistic housing need figure for Bedford Borough would be 1,021 dwellings per annum.

In reply, the Minister of State for Housing made it clear that Bedford's case would not be supported, and that if they were to submit a plan that did not conform the Standard Method calculation they would be proceeding at high risk.

The current Mayor has also stated that he has major concerns about the scale of development proposed in the plan and would prefer to restart the process.

All this when we hear a constant stream of comment from the government saying that they have abandoned top-down targets and are allowing local communities to determine their own priorities.

Whilst CPRE Bedfordshire very much supports the principles of a democratic, rules-based planning system, it's difficult to locate the democratic legitimacy of this plan.

In our consultation submission and in our oral representation to the Block 1 Hearing Session on Matter 3, CPRE Bedfordshire presented a detailed case arguing that the Standard Method derived target is disproportionate for Bedford Borough. I will not repeat those arguments here, but what we are seeing in policies HOU12 to 18 is the consequence of the decision made by Bedford Council to follow the Minister's advice.

Wilstead Parish Council have provided a clear account of the negative impacts that will follow on their community. CPRE Bedfordshire support their concerns, especially their concern that the combined effect of the scale of the new development proposed in HOU 15 and 16 around Wilstead, creates a continuous and substantial expanse of housing in the local area, eroding local gaps and undermining the rural character of the village.

As a result, the vision set out for the future of the village in their Neighbourhood Plan, made as recently as January 2023, is completely compromised.

For the reasons stated regarding the excessive and unsustainable housing target that underpins this plan, we maintain that Bedford's plan fails the test

for soundness under Para 35 NPPF, on the basis that it is not 'Justified,' that is, that it does not provide an appropriate strategy taking into account reasonable alternatives and is not based on proportionate evidence.

Bedford Council are caught on the horns of a dilemma, should they withdraw the plan and revise the submitted plan proposals for a much scaled down level of development, based on a more reasonable appraisal of local housing need, or should they press on with this plan for fear that unless they do so, their development plan will be deemed out of date with the result that the strength of local housing policies will be greatly diminished?

**Is there any hope that we could look to you to help the Council to find a way out of this predicament, that allows Bedford to revise their submitted plan proposals without falling prey to a torrent of speculative development?**