



The countryside charity
Bedfordshire

**Briefing Paper: Bedford Borough Council Local Plan 2040
Examination Stage**

CPRE Bedfordshire Statement to Examination Hearings

Matter 5 – Spatial strategy and distribution of growth

Thursday 15 June 2023

Issue: Whether the plan is justified, effective and consistent with national policy in relation to the chosen spatial strategy and planned distribution of growth.

Plan policy focus – DS2(S) and DS5(S)

Question 12.

How have water resource issues been considered in terms of the ability to deliver the chosen spatial strategy?

What is the Council's response to the representation from the Environment Agency relating to this issue?

In our response to the “Local Plan 2040 Submission Version Consultation” (para’s 35 to 38 inclusive), we highlighted our very serious concerns about the supply of drinking water and the absence of an effective and environmentally sustainable sewage system, that would be required to supply the huge housing target to be delivered over the Plan period.

Our concerns were shared by the Environment Agency (EA) which submitted objections to the Local Plan 2040 Submission Version Consultation on this issue.

I refer to EA representations ID 9773 (Policy DS1(S) Resources and climate change) and 9774 (Policy DS3(S) Amount and timing of housing growth) which state that Local Plan 2040 is “not sound” for the following reason:

Noting that the development strategy involves an uplift of the housing requirement of 40% from 970 dwellings per annum (2030 plan) to 1355 dwellings per annum in this plan, they reviewed sections 5.3 Potable Water and 5.4 Wastewater, of the Infrastructure Delivery Plan dated May 2022.

They commented that the IDP doesn't provide sufficient evidence to demonstrate that the proposed growth put forward by the plan can be delivered sustainably, and not place further pressures on a water environment (notably rivers and groundwater) which is already under pressure from abstraction for public water supply and wastewater discharges.

They therefore concluded that Policy DS1(S) 'Resources and Climate Change' and potentially Policy DS3(S) 'Amount and timing of growth' are unsound as they are not consistent with paragraphs 20 and 153 of the NPPF.

As you will know, Paragraph 20 (b) sets the baseline in requiring that strategic policies should make sufficient provision for infrastructure for water supply and wastewater.

Paragraph 153 requires that plans take a pro-active approach to mitigating and adapting to climate change, taking into account the long-term implications for (amongst various issues) water supply."

The EA representations goes on to explain the reasons for their objections and in short, stated these relate to shortage of Potable Water to supply the proposed number of new homes and the fact that the current sewage system is already operating at capacity and unable to supply the current housing stock without seriously polluting the River Great Ouse, let alone cater for any substantial increase in housing numbers.

Disturbingly the EA make the following comment regarding wastewater treatment capacity:

"For wastewater we are concerned that the IDP relies on Anglian Water's now out-of-date Water Recycling Long Term Plan 2018.

It's not demonstrated whether the proposed level of growth in the 2040 plan has been accounted for in the water companies plans and the in-combination effects of proposed growth in neighbouring districts utilising infrastructure in Bedford.

They continue, stating that it must be demonstrated that the delivery of the 2040 plan will not result in a breach of environmental legislation due to the increase in foul drainage generated and discharged via sewerage infrastructure into local watercourses.

Assessments carried out should highlight locations where upgrades to the foul water infrastructure are necessary and identify measures, including phasing new development, so that wastewater infrastructure will be in place to avoid creating local environmental problems."

CPRE Bedfordshire are also concerned that with regard to the current Local Plan 2030, the following new housing developments allocated in Key Rural Service Centres are unable to proceed due to problems with the capacity of the Sewage system or Potable Water supplies:

1. Village of Sharnbrook – 500 new homes allocated:

The Planning Application which relates to this allocation is currently on hold due to sewage capacity issues at the Olney Water Recycling Centre. The Olney WRC has been discharging sewage storm overflows into the River Great Ouse regularly during the last few years.

During 2020 there were 4,193 spillage hours from 185 separate incidents. This equates to approximately 6 months of sewage storm overflows!

The EA has stated that the Olney WRC does not currently have the capacity to accept the foul water from this proposed development already allocated in the Local Plan 2030.

2. Village of Clapham - 500 new homes allocated:

The Planning Application which relates to this allocation is also on hold due to serious issues identified by the EA regarding the Clapham Water Recycling Centre. At present the Clapham WRC is unable to safely supply the additional water required by this development.

It should also be mentioned that the Environment Agency has stated that water abstraction from the River Great Ouse is currently at the maximum permissible level, particularly during summer months.

We understand that any increase in output at the Clapham WRC would require substantial additional water abstraction from the River Great Ouse.

Lastly, some comments on the Joint Submission and Joint Statements issued by Anglian Water and the Environment Agency on the Bedford Water Recycling Centre

The Joint Submission published in the Duty to Cooperate Compliance Statement does not provide confidence that environmentally sustainable solutions can be found to the principal issues relating to the supply of Potable Water or a Sewage System that does not continue to pollute the River Great Ouse. It makes no mention of the Olney WRC issues.

The Submission concedes that: “A scheme is being planned that will enable Bedford WRC to accommodate future growth into the 2030s”

The proposed Scheme is only looking ahead to the 2030’s and no details of the “planned scheme” have been submitted because they have yet to be finalised.

The Joint Statements (see Examination documents ED30 and ED32 -<https://edrms.bedford.gov.uk/OpenDocument.aspx?id=OwaFx%2f9UVG1H4pqvkEYztQ%3d%3d&name=Examination%20Documents.pdf> - published recently, as far as we can see offer very little of any substance by way of reassurance that these issues can be reliably resolved.

With this background, it is quite clear that the environmental issues regarding the supply of water and sewage to the huge housing numbers included in this Local Plan 2040 are far from being agreed or indeed achievable and, at the same time ensure that the water quality of our principal river, The River Great Ouse, is very substantially improved from the current very low levels, in order that it can help to ensure a very significant improvement in biodiversity. Water supplies from Aquifers are also unlikely to be able to sustain this level of housing growth.

So in conclusion, the EA's primary objective at a time of Climate Change and the crisis of Biodiversity Loss is to ensure high levels of water quality.

This objective cannot be achieved with the massive house building target central to the Local Plan 2040 and therefore it provides yet another reason to doubt that the massive acceleration of housing growth can be delivered safely and sustainably.

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