



The countryside charity
Bedfordshire

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Mayor Tom Wootton
Borough Hall
Cauldwell Street
Bedford
MK42 9AP

3rd December 2023

Dear Mayor Tom Wootton,

RE: Inspector's Post hearings advice: examination of the Bedford Local Plan 2040

I am writing in response to the Inspector's post examination hearings advice to the Council regarding the Bedford Borough Local Plan 2040.

While we are extremely concerned about the potential consequences of the conclusion reached by the Inspector, his concerns about the soundness of the plan were shared by CPRE Bedfordshire in the views we expressed in our submission to the S19 Local Plan Consultation. However, our perspective on the cause and remedy for unsoundness is very different from that of the Inspector.

CPRE Bedfordshire's position is that the Plan is fundamentally flawed because the massive housing target, derived from the use of outdated ONS data and the application of the government's widely criticised Standard Method algorithm, is excessive.

We believe this inevitably means that any plan based on this housing growth requirement, which aims to encourage a substantial population movement to Bedford from elsewhere in the country, will be wholly unsustainable. (Our response to the S19 Consultation is attached.)

We discussed this with the previous Mayor Dave Hodgson, prior to the submission of the 2040 plan, and he agreed with our view. He had written to the Secretary of State, Department for Levelling Up, Housing and Communities, in April 2022 requesting that the housing target be reviewed and reduced. He made the case that the Council were in the position of being "obliged to plan for an excessive housing growth rate far in excess of that which the borough can sustainably accommodate."

The Opinion Research Services Housing Need Assessment Report, commissioned by the Council, highlights the pressures that this excessive housing requirement places upon the Borough. They state that the housing requirement includes an 'unusually high level of

inward migration' and in their verbal presentation to the Examination Hearings, they stated that housing growth targeted in the Plan places Bedford in the top ten fastest growing Councils in the country.

When you were elected in May this year, you made it clear that you were of the same view and had wanted to stop the Plan so that the housing target could be reviewed and revised. We understand that you decided against that course of action following legal advice about the uncertainty that would follow if the Plan was withdrawn.

The Inspector has reached the conclusion that due to the uncertainty regarding the delivery of required transport infrastructure, and the feasibility of the build out rates required to deliver the Plan, there is an overall shortfall of 2,000 homes that will need to be provided in a different way.

Clearly, this places the Council in a difficult position, and unless there is a way of resolving the Inspector's reservations, it may be necessary to withdraw the Plan and find an alternative to the chosen spatial strategy.

In considering the way forward, the Council needs to be mindful of the fact that it has clearly stated that it believes the spatial strategy set out in the submitted 2040 Plan is the only option capable of producing a sound and sustainable plan for growth at this level.

CPRE Bedfordshire has consistently stated that the current target results in a grossly inflated and disproportionate housing growth target for Bedford Borough. Unless a reduction of this target can be agreed with the government, the Council will be moving forward to replace one flawed strategy with yet another.

The Inspector's suggestion that the Council should explore the potential of Key Service Centres (Bromham, Clapham, Sharnbrook and Great Barford) and Rural Service Centres to deliver additional housing to make up the shortfall, should be resisted at all costs. In defining the rationale for the spatial strategy for the 2040 Plan, the Council made a reasoned judgement that the development expectations placed upon rural communities in the 2030 Plan should not be added to within the lifetime of the 2040 Plan.

For the reasons stated above, CPRE Bedfordshire believe it is important that you respond urgently to the Inspector's advice, with support from local MPs, by prevailing upon the government to allow the housing growth target for the Plan to be revised and reduced. This is the only way of achieving a plan which can be delivered in an environmentally sustainable manner and better reflect the future needs of Bedford Borough and its residents.

Yours sincerely,

Paul Jenkins

Vice Chair CPRE Bedfordshire

Cc Richard Fuller MP, Alistair Strathern MP, Mohammad Yasin MP

CPRE Bedfordshire, the countryside charity – S19 Consultation Response Extract

Para 3.1 to 3.5 – OBJECT

Calculation of Bedford's housing requirement

The current Local Plan 2030 requires that the Council arrange for the development of 970 new homes per year over the Plan period. The proposed new Local Plan 2040 will increase this by 32% to 1,275 new homes per year over the 20 year period of the Plan – a total of 25,500 new homes.

(Note CPRE consultation submission predated the ORS Addendum report of April 2022 where the figures were updated to reflect the most up to date information available at that time. The target in the submitted Local Plan 2040 was amended to 1,355 dwellings pa., 27,100 new homes over the 20 year period.)

The calculated housing requirement of 25,500 dwellings is equivalent to building around 25 new villages the size of Sharnbrook (approx. 1,000 homes) or six new towns the size of Ampthill (approx. 4,000 homes).

Existing commitments

A full breakdown of existing commitments, referred to as representing 13,000 dwellings (including allocations from current local plans and an allowance for windfall) should be provided so that the accuracy and reasonableness of this figure can be examined. In the absence of an analysis of the forward trajectory upon which this figure is based, the gap between the proposed housing requirement figure and existing commitments cannot be verified.

In regard to the allocations from current local plans, CPRE Bedfordshire believe that the substantial inflation of the housing requirement in the 2030 plan as well as this draft 2040 plan has resulted in excessive expectations upon the Key Service Centres of Bromham, Clapham, Great Barford and Sharnbrook. The Council should be challenging the current government advice on the standard method so that the Council's housing requirement can be recalculated based on the most up to date data from the Office for National Statistics (ONS). This would allow for the current expectations for new housing delivery from the Key Service Centres, currently totalling 2,000 homes, to be reduced by at least 50%.

CPRE Bedfordshire fully recognises the need for new homes for the people of Bedford Borough and in particular, affordable homes and social housing. However, these huge numbers are based on inaccurate and outdated 2014 housing data from ONS and the much criticised Standard Method algorithm which the government insist that local authorities use to determine housing need. This is despite considerable disquiet among government MPs and demographic experts, including the highly regarded company Opinion Research Services (ORS), which was responsible for preparing the Council's Local Housing Need Assessment upon which the draft Local Plan 2040 is based.

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Para 3.1 to 3.5 continued

ORS point out in the "Bedford Borough Housing Needs Assessment" (HNA) page 12, para 28, 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 15,442 new homes, a very considerable reduction on 25,500 proposed in the Local Plan.

The government then insist however, that a further 8,877 new homes are added to the 15,442 to encourage even more inward migration into the Borough. As ORS point out in a comment on page 74 of the HNA para, 6.16: "This level of inward migration is notable The extra 8,877 dwellings for inward migration implied by the standard method represents an increase of 88% over and above the inward migration already included in the most up to date household projection" i.e. 15,442 new homes.

This is a staggering increase with no justification from Government.

The ORS data shows that approximately 70% of the total of 25,500 new homes to be built in the Plan period are to encourage a massive inward migration of people from elsewhere in the UK to Bedford Borough.

This is a key part of the Government's development plans for the OxCam Arc which the Mayor and the Council have signed up to without consulting local people.

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/speculators.

If accurate, up to date ONS data is used from 2018 Housing Formation analysis, then the calculated housing need for the Borough would be similar to the current Local Plan 2030 housing requirement of 970 dwellings per annum.

CPRE Bedfordshire's position is that we are completely unable to accept the figure of 1,275 new homes per year which will destroy the Bedfordshire countryside at a time of:

- Climate Emergency
- Catastrophe of biodiversity loss - bird species in the UK have dropped by between 40% and 70% in the last 40 years and insect populations by similar numbers and the decline is increasing at pace.
- The UK's ranking amongst the most nature depleted nations on earth.

The cause of much of this has been the "Growth At Any Cost Agenda" that has been followed for many years. We urge the Council to reject this agenda and the "business as

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Para 3.1 to 3.5 continued

usual" approach and to look towards different, more modern and more environmentally sustainable objectives.

This means turning away from the government's OxCam housing growth ambitions and focus on building good quality affordable housing for local people (including a reasonable level of inward migration) and the protection and enhancement of the beautiful Bedfordshire countryside, not its destruction.

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

Comparisons with other Local Planning Authority housing targets

CPRE Bedfordshire has compared Bedford Council's housing target, which has been calculated using the government's discredited standard method algorithm, to the housing targets of other surrounding local authorities. In this comparison, Bedford Council's housing target of 1,275 new homes per year for the next 20-year duration of its draft Local Plan 2040 is shown to be:

- One of the highest of any local authority in the southeast of England outside of the Greater London Metropolitan area.
- Higher than that of the city of Cambridge or any local authority in Cambridgeshire.
- Higher than the housing target of the city of Oxford or any local authority in the county of Oxfordshire – in fact, it is almost double the target of each local authority in Oxfordshire
- Bedford Council's housing target is over 30% higher than that of Huntingdonshire District Council, part of Cambridgeshire, and 18% higher than that of South Cambridgeshire Council. (Both of these Cambridgeshire authorities have similar populations to that of Bedford Borough.)

The counties of Oxfordshire and Cambridgeshire are more than twice the size of Bedfordshire, which is one of the smallest counties in England. Bedford Council's housing target is 31% higher than that of North Hertfordshire, 180% higher than East Northamptonshire, 142% higher than Kettering and 266% higher than Wellingborough.