



# The countryside charity Bedfordshire

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## Briefing Document

### CPRE Bedfordshire's Response to Bedford Borough Council's (BBC's) Local Plan Review Issues and Options Consultation Summer 2020

**This Briefing Document has been produced in response to requests from Town and Parish Council members and non-members who have asked for our views on BBC's Issues & Options Consultation.**

The response should be read in conjunction with the BBC Issues and Options Consultation Document which provides background information to the questions. It can be found here: <https://bedford.oc2.uk/document/1>

#### Question 1

**Do you agree with the proposed scope of the local plan review? If you think that other areas of existing policy should be updated or new policy areas added to the list, please explain what they are and your reasons for wanting them to be included in the plan.**

Agree proposed areas as set out and would suggest that additional new policies are required to address the following issues:

**1. Biodiversity Gain** - it is imperative that Policies are introduced to ensure that specific and substantial Biodiversity Gain (e.g. +20%) is achieved as part of all development undertaken in the Borough over the Plan Period.

**2. Ownership of publicly accessible Open Green Space and housing development boundaries** – Policies are required regarding the long term ownership and maintenance of all publicly accessible Open Green Spaces of all types, formed as part of new housing or industrial developments in both urban and rural locations.

It is CPRE Bedfordshire's view that these areas should be owned and maintained by Town and Parish Councils whose actions (including the costs of maintenance) are democratically accountable to residents and not retained by developers as has become the case recently.

## **Question 2**

**Do you have any comments on the draft vision? If you think that it can be improved, please tell us how.**

**1. Need to ensure that effective policy measures are in place to deliver the vision,** especially “Sustainable development and transport, the use of renewable energy technology, green infrastructure and new high quality green spaces in both urban and rural areas, will all contribute to reducing the Borough’s carbon footprint and securing a net-gain in biodiversity.”

**2. River Great Ouse and River Valley Area** – the River Great Ouse and the associated valley area throughout the Borough is the real “**jewel in Bedford Borough’s crown**” and yet the protection and enhancement of this hugely important environmental asset is completely overlooked in the draft Vision. This needs to be corrected.

In biodiversity terms alone, the River Great Ouse and its valley area has the capacity to deliver very substantial gains, urgently needed at this time of catastrophic loss.

Tree planting in the riverside and valley area could help us to achieve our carbon reduction targets, minimise flooding and improve water quality.

## **Question 3**

**In line with Government policy, the shortest plan period would be 2020 to 2040. Do you agree with this plan period? If you think the plan period should be longer, what plan end-date would you suggest and why?**

**1. The 2020 to 2040 plan period is preferred.** The further the plan period extends the more difficult it becomes for the plan to take account of significant changes that will need to be reflected in the plan e.g., changing economic conditions, including patterns of employment, post-COVID and post-Brexit; increasing levels of urgency to respond to the impacts of climate change and ongoing evaluation of the effectiveness of measures to combat global warming as time goes on.

National Planning Policy does, in any case, require reviews of local plans to be undertaken on at least five yearly intervals. This takes away many advantages of a longer plan period.

**2. The absence of a question on the level of housing growth needed is a very significant and disappointing deficit in this consultation,** despite the fact that the 8<sup>th</sup> paragraph of the Strategy and Infrastructure section states;

***“this consultation seeks views on a housing figure in the range of 800 –1,305 dwellings per annum. It should be borne in mind that an annual figure of 1,305 dwellings per annum would represent an increase of 35% on the current adopted Local Plan 2030 figure of 970 dwellings per annum. The 800 figure represents an estimate of the possible figure were the standard methodology to be reviewed and based on the 2018-based population projections rather than the 2014-based figures.”***

**CPRE Bedfordshire fails to understand why BBC continues to suggest that the basis for housing numbers should be the current Standard Method using 2014 ONS data i.e. 1,305 dwellings per year, when the government's own Planning Practice Guidance states:**

*"Wherever possible, local needs assessments should be informed by the latest available information. The National Planning Policy Framework is clear that Local Plans should be kept up-to-date. A meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued." (Paragraph: 016, Reference ID: 2a-016-20150227).*

As BBC state in the Issues and Options Paper, using the latest 2018 ONS data means that the Standard Method Calculation gives a much reduced figure for housing need of 800 dwellings per year.

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**This is a very significant and meaningful difference and therefore, since this is the most up-to-date data, it is this figure (800 new dwellings per year), according to Government Guidance, which BBC should be using at this Issues and Options stage.**

If the 2014 based figures are used, even larger areas of open countryside will be built on, not to provide housing for local people but to encourage large movements of population from elsewhere in the country to Bedford Borough.

**On the 6<sup>th</sup> August, after this consultation was launched, the Government announced a consultation on yet another means of calculating the much criticised Standard Method for assessing housing need.**

It should be expected that the government's review of the Standard Method will result in revisions to the methodology based on the 2018-based population projections.

Housing growth figures based on the 2014-based population projections result in a gross and unjustifiable overstatement of local housing need in the Borough and are therefore invalid.

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### **3. SEMLEP Local Industrial Strategy**

Section 3 of the Consultation also refers to the SEMLEP Industrial Strategy and the fact that the Local Plan will need to take the Strategy into account during its development.

However, the SEMLEP Industrial Strategy which looks to create a massive increase in population over the Oxford – Cambridge Arc of around +1.9m people (twice the population of Birmingham), has never been subjected to Public Consultation or Environmental Impact Assessment. Neither has BBC discussed and agreed to the SEMLEP Industrial Strategy at any of its Executive or Full Council Meetings that we're aware of.

In CPRE Bedfordshire's view it therefore carries no more legitimacy than that of a "lobby group" since the majority of its members are unelected representatives of the private sector.

#### **Question 4**

**Having considered the potential locations for growth illustrated above, and the pros and cons in Table 1, which one(s) if any do you support? It may be that the local plan strategy will need to combine elements from more than one of the locations to achieve the scale of growth required. Can you suggest other locations?**

**1. In order to maintain a reasonable balance between the rural and urban/urban edge, and to realise the draft vision put forward for this plan period to recognise the value of the Borough's countryside, "its intrinsic character and beauty, including areas of tranquil retreat," it is essential that the rural villages (key service centres and rural service centres) are not put under further pressure in addition to the requirements for growth of the current Local Plan 2030.**

**2. CPRE Bedfordshire considers that the following 3 options (or a combination of them) would avoid many of the negative impacts on the countryside and rural areas of the Borough, offer better transport connections and easier access to employment:**

- **Brown – Urban based growth**

This option provides for growth around existing urban areas together with extensions to existing towns.

The proposal to build at higher densities around urban areas to deliver a significant number of homes is supported. The advantages listed in the option appraisal are important considerations that should be capitalised on:

- Support for services, facilities and businesses in urban areas, particularly Bedford town centre.
- Greatest potential for residents to make sustainable travel choices (walking, cycling and public transport).
- Increasing development density improves public transport viability.
- Best use of brownfield and under-used land.
- Reduces need for development in open countryside.
- More employment uses within centre will improve viability and create direct benefits of other associated business uses such as retail and leisure.

- **Yellow – A421 based growth**

Growth along the A421 road corridor where there are already good road links and opportunities to improve road-based public transport is supported.

Ease of access to employment areas with good connectivity is important

- **Pink - Rail growth**

This option combines some of the benefits of urban and A421 growth location options. Developing housing growth which is closely aligned to existing and planned road and rail infrastructure is supported.

The alternative Route B for East West Rail which follows the A421 transport corridor and which CPRE Bedfordshire strongly advocates, would offer enhanced opportunities for this option and more effectively deliver:

- high-tech employment development in balanced communities with the option to live and work locally
- Increased employment opportunities in the urban area and sustainable methods of transport for those residents in most deprived areas.

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**3. CPRE Bedfordshire therefore considers that the following options would have substantial negative impacts on the countryside and rural areas of the Borough and does not support them:**

- **Orange - East – West rail northern station growth**

The current chosen route for East - West Rail route E, travelling north from Bedford Midland station, then moving eastwards towards the Tempsford area, is undesirable in terms of impact on an area of open countryside and rural villages in North Bedford and impractical in a number of ways.

The cost estimates for the routes considered in the option appraisal published in January 2019 showed Route E as the most expensive option with estimated total costs at £3.0 billion compared to an estimated cost of £2.4 billion for Route B, CPREs preferred route. Route E was said to potentially involve ‘complex interfaces with the Midland Main Line, which might include re-modelling or re-locating the existing Bedford maintenance depot, and would be expected to reduce the likelihood of securing private financing that represents value for money.’

In any case there are no plans for a station between Bedford and the interchange station on the East Coast Mainline, so the whole premise of this option is unrealistic.

Route B provides a much better option. It follows the A421 corridor south of Bedford and provides a number of advantages; the opportunity to create a station at Wixams to serve the growing population there, it would avoid bringing yet more traffic into the highly congested areas leading to and around Bedford station, as well as avoiding disturbance of the tranquility of small rural villages and countryside north of Bedford.

Route B would also support the Pink - Rail growth option (see our earlier comments)

- **Grey – Dispersed growth**

This option involves some expansion in all rural villages and would result in negative impacts on the character and landscape settings of the rural villages.

The new housing growth these villages are already required to deliver over a 10 year period in the Local Plan 2030, is unprecedented in scale for these communities.

In regard to the Key Service Centres, the 2030 targets for Bromham and Clapham represent a 25% increase in the number of households. For Sharnbrook and Great Barford the 2030 growth targets represent a 50% increase in the number of households.

In Rural Service Centres the growth requirement of 25 to 50 houses by 2030 is significant and generally requires extension of planning boundaries to accommodate green field development in open countryside.

We believe the new housing required in rural villages in the Local Plan 2030 needs to be given the chance to mature to 2040, and the rural villages should not be expected to deliver further growth in the new plan period.

One of the disadvantages identified for this option is that the dispersed nature of the growth is unlikely to facilitate employment growth. This will result in more car use as residents have to travel further to go to work and access essential services, making walking and cycling less attractive.

The advantages listed for this option are very weak.

- **Red - New settlement based growth**

This option relies heavily on additional growth generated by a new settlement (or settlements) in North Bedford. This would result in

unacceptable intrusions into areas of open countryside and unmanageable pressures on existing road infrastructure.

It is difficult to see how the advantage listed to ‘provide opportunities for sustainable and active transport links, both between new settlements and to the urban areas’ could be realized.

The option appraisal recognises that in these locations significant new infrastructure may be required to accommodate growth. This would add to the adverse impacts on local landscapes and the loss of agricultural land and countryside.

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The development of a large new settlement (or settlements) in North Bedford with associated infrastructure requirements would undermine the rural ambience that higher value occupiers are said to value.

### **Question 5**

**Infrastructure needs building in from the start to ensure new development is suitably accessible and supported. What infrastructure do you consider is key to the delivery of growth in Bedford borough?**

**1.** In order to achieve more sustainable development the current principle of developing additional primary road networks to facilitate new development needs to be abandoned in favour of environmentally sustainable alternatives.

The emphasis needs to be on ensuring easy access to public transport, and sustainable transport alternatives – encouraging good quality “first mile – last mile” connections and sustainable transport hubs.

An integrated network of “Dutch style” segregated cycle routes in both urban and rural areas needs to become the norm encouraging people of all ages to feel safe and use their bicycles more regularly.

Current practice of simply painting the roads to enable poor quality unsafe cycle routes needs to be ended.

The priority currently given to the car over cycling and walking needs to be wound back.

Easy access to electric cars, charging points and car clubs – see trials operating in other areas of the country e.g. Bristol.

Soft infrastructure e.g. doctors surgeries, shopping facilities, sporting/recreational facilities, community centres etc. need to be available locally reducing the need for residents to use the car to access them.

## **2. What is meant by Growth?**

**BBC needs to define more clearly what it means by “Growth”.**

Does it mean, as now, Growth at any cost no matter what the environmental damage or reduced “quality of life” - encouragement of huge population growth (+1.9m people) and the creation of a mega urbanisation (1 million homes equivalent to 20 cities the size of Cambridge) across the Oxford – Milton Keynes – Bedford - Cambridge Arc, with Bedford Borough as the warehouse capital of the Arc?

Or, does it mean Growth which results in, as priorities; improved “Quality of Life” for all residents, reduction in carbon emissions, increase in biodiversity, reduced air pollution, affordable homes (especially homes for social rent) for all local people, quality open green spaces for both urban and rural communities, a viable and sustainable countryside – our “Natural Health Service”, quality employment opportunities for local people etc. etc.?

**Clarity on this issue will define more clearly the way forward.**

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### **Question 6**

**More employment sites will need to be allocated alongside housing growth. Where do you think new employment sites can be located in Bedford borough?**

In general, employment sites need to be located close to centres of population and to sustainable transport networks or hubs.

Wherever possible, they should be located on brownfield sites.

Warehousing should not be located in rural communities accessed by the rural road network.

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### **Question 7**

**Connectivity to other economic centres, including Oxford and Cambridge, will improve with East-West Rail. How do we capture the benefits of this greater connectivity to these economic centres, to improve and increase the value of the economy of Bedford?**

If Bedford wishes to benefit from East-West Rail and the improved connectivity to Oxford and Cambridge it should abandon its mistaken preference for the “northern” Rail Route and instead go for the Route B along the A421 transport corridor with a “parkway” station at Wixams.

This would discourage traffic from the centre of town interested only in accessing Bedford station, reduce air pollution and improve the quality of life of residents on all access routes.

Bedford should establish itself as the “green” market town with the emphasis on residents’ quality of life, promoting all forms of sustainable transport to create a modern and sustainable environment that people would aspire to live and work in.

The town of Bedford should become a network of quality open green spaces and green corridors linking pedestrian and cycle ways with the river area.

It should define and build on its strengths – recognising and publicising the beautiful countryside around it, not building a railway line on an unwanted route through tranquil open countryside.

### **Question 8**

**Do you have any further views to add to those listed in the Town Centre Plan (see Consultation responses above)?**

**See answer to Question 7**

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The reduction of large stores (M&S etc.) in Bedford town centre could encourage small local business to flourish if rents are reduced accordingly.

### **Question 9**

**Do you agree that the Council should produce further guidance for developers on how to respond to climate change? If so, what should be included in it?**

#### **1. New homes conformity to design standards – energy efficiency**

Developers should be asked to provide evidence that the new homes they build in the Borough conform to the design standards that developers say their homes are designed to achieve in terms of energy efficiency etc.

Too often new homes fail to achieve the energy efficiency targets that the developers say they have designed homes to achieve.

Sometimes they are too optimistic, other times it is due to on-site changes made to construction materials etc.

#### **2. Climate Change targets and Biodiversity improvements.**

BBC needs to be very clear as to the specific Climate Change and Biodiversity improvement targets that they expect developers to achieve.

These targets need to be measureable.

### **Question 10**

**The Government is developing new house-building standards to be implemented through building regulations. Is there any local evidence or need to go beyond national standards?**

## **1. Water consumption**

Bedford Borough lies in an “area of serious water stress” as defined by the Environment Agency – there is a need for BBC to ensure that all housing and office/industrial development conforms to the highest level of water conservation.

## **2. SUDS Infrastructure – long term maintenance**

BBC should ensure that sufficient funds have been obtained from developers to ensure that the long term maintenance of SUDS infrastructure is assured.

### **Question 11**

**What do you think would encourage people in Bedford borough to make greater use of sustainable modes of transport?**

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See answer to Question 5 – point 1, also:

- **Making sustainable modes of transport safe and easily accessible.**  
e.g. Dutch style segregated cycle routes, buses able to access all new housing developments so that bus stops are easily accessible to all residents
- **Substantially increasing the frequency of bus services to rural communities**
- **Actively reducing the priority given to unsustainable forms of transport.**
- **Reversing past unsustainable transport policies and actions**

e.g. The serious issue of not being able to access Bedford town centre safely by bicycle from the Wixams new town should be ended by demanding that Highways England build a cycle bridge across the A421 as they committed to do years ago.

BBC to ensure that the new Bromham Road Bridge across the railway is supplemented with an additional cycle bridge to enable safe cycle access to Bedford station as BBC said it would two years ago - to date no planning application has been forthcoming.

### **Question 12**

**If you think that our existing planning policies to protect and enhance the natural environment fail to cover important national or local issues, please give details.**

- Current policies do nothing to protect and enhance the River Great Ouse and valley area – the “jewel in Bedford Borough’s crown”

- Health and Wellbeing - The importance of access to quality Open Green Space and Countryside in terms of Health and Wellbeing has not been considered

**Question 13**

**Is there anything else that is addressed in the new Government guidance that is not adequately covered by existing policies? – No CPRE Bedfordshire comment.**

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**CPRE Bedfordshire**

**25 August 2020**