



The countryside charity Bedfordshire

Bedford Local Plan 2040 Consultation

CPRE Bedfordshire Initial Response to the draft plan

Introduction

Bedford Borough Council is preparing a new Local Plan 2040 and published a draft plan for consultation on 28th June 2021.

The Borough Council were instructed by the planning inspectors who examined the Local Plan 2030 that the Plan should be subject to an early review to incorporate the latest information so that a new plan can be submitted by January 2023.

The Borough Council will be updating some Local Plan 2030 policies to keep them in line with national policies, in particular those associated with the government's new formula for housing growth, and proposed developments across the Oxford – Milton Keynes – Bedford - Cambridge Arc.

The consultation will close at 5pm on Friday 3rd September 2021.

Full details on the draft plan and consultation process can be found at:

<https://www.bedford.gov.uk/planning-and-building/planning-policy-its-purpose/local-plan-review/>

CPRE Bedfordshire's view of the spatial strategy options

CPRE Bedfordshire will access consultation events arranged by the Borough Council and seek to hear views from our members during the consultation process. We will continue to explore and appraise the proposed special strategy options through the consultation period before submitting our full response to the consultation.

The following principles will apply to our consideration of the Council's preferred development options:

- The plan should adopt a 'brownfield first' approach to the spatial strategy.
- The focus on transport corridors is supported, subject to the need to avoid development intrusion on high quality agricultural land, open countryside, and rural communities as far as possible.
- The views of parish councils and local residents should be given proper consideration.

CPRE Bedfordshire will be seeking greater clarity about the way that the draft plan deals with anticipated 'windfall.' If this has been consistently above 10% of the annual housing requirement as stated, then there appears to be the opportunity to include windfall development as a contributor to the housing growth target. It is not clear that windfall has been included in this way.

Positive impressions from our initial appraisal of the draft plan

- The proposal to set the timescale for the plan to 2040 creates a good balance of establishing a longer-term strategic perspective, alongside the recognition that strategic policies need to show the required agility to respond to evolving economic and social conditions.
- In the opinion of CPRE Bedfordshire there appears to be a welcome shift in the level of openness and transparency in regard to the Council's commentary on its view of the national context and national policy.
- The vision themes which aspire to a 'Greener', more 'Accessible' and 'Prosperous', Borough with 'Better Places' for all to use and enjoy provide a positive platform for the plan to be based on. Although without clearer and specific targets and timescales to support the ambition to make "Bedford a net zero carbon emissions borough whilst improving, enhancing and creating green infrastructure and spaces," the prospects of making substantial progress will be considerably weakened.
- The spatial strategy options put forward in the draft plan offer a helpfully wide range of choices for consultees to comment on.
- The limited expectations on parishes with neighbourhood plans to contribute further development sites in the proposed preferred options in this plan, (other than those included in transport corridor options within option 2d), are to be welcomed.
- Draft plan policies to continue the focus on regenerating the town centre for town centre uses represent an important priority. The Council's successful bid for Town Centre Deal funds provides a valuable boost to the Council's capacity to have a greater impact in this respect.
- CPRE Bedfordshire has expressed huge concern about the over-development of land-hungry warehousing in Bedford, which has contributed very little to local job opportunities and blighted many residential areas, particularly where located in close proximity to locations where new large scale new housing has been developed. We welcome the recognition in this draft plan that new allocations for large-scale warehousing are not appropriate and that the employment strategy should focus on enabling higher skilled job opportunities in the Borough.

Issues of major concern 1: Housing numbers for the Key Rural Service Centre Villages – Bromham, Clapham, Great Barford and Sharnbrook at 500 new homes for each (total 2,000 new homes) are far too high and should be reduced by 50%

The current Local Plan 2030 agreed 2,000 new homes for the Key Rural Service Villages but BBC have exceeded their current Local Plan of 970 new homes per year by 330 new homes in each of the last 3 years – a total of approx. 1,000 new homes more than were planned.

Planning Inspectors who have considered the issue in recent months have concluded that the exceeded target can be brought forward and used to offset future housing numbers.

We therefore urge the Council to reconsider these allocations and substantially reduce housing numbers in these villages by 50% to 250 new homes in each village, a new total of 1,000 homes.

Current numbers are excessive for these relatively small communities and the majority of the new homes will be built on greenfield sites currently used for farming. This is unsustainable at a time of Climate Emergency when all available farming land will be needed for the production of food.

Issues of major concern 2: Hugely excessive and environmentally unsustainable 32% increase in housing numbers

The current Local Plan 2030 requires that Bedford Borough Council (BBC) 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.**

This 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).

CPRE Bedfordshire fully recognises the need for new homes for the people of Bedford Borough and particularly affordable homes and social housing. However, these huge numbers are based on completely inaccurate and outdated 2014 housing data from the ONS (Office for National Statistics) and a much criticised “Standard Method” algorithm which the Government insist that 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 has prepared BBC’s Local Housing Need Assessment – part of this Local Plan 2040.

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 Oxford – Milton Keynes – Bedford – Cambridge Arc which The Mayor and the Council have signed up to without consulting local people. (See <https://www.cprebeds.org.uk/resources/cpre-challenges-arc-leaders-to-open-up-to-the-public-on-development-plans-for-the-oxford-cambridge-arc/> and <https://www.cprebeds.org.uk/news/cpre-bedfordshire-calls-for-the-empowerment-of-local-people/> for more on this issue)

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 land owners/speculators.

If accurate, up to date ONS data is used from 2018 Housing Formation analysis, then housing need in the Borough would be roughly the same as the current Local Plan 2030 level.

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

This means turning away from the Governments Ox - Cam housing growth objectives and focusing 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.

As the consultation progresses, we will continue to provide more detailed information as we form our final response.

We'll keep standing up for the Bedfordshire countryside. Want to stand with us? Join us as a member from just £3 a month via <https://www.cprebeds.org.uk/get-involved/become-a-member/>