



# The countryside charity Bedfordshire

## Bedford Local Plan 2040 Consultation CPRE Bedfordshire Full Response to the draft plan

### Introduction

CPRE Bedfordshire believes in a democratic planning system and Local Plans are the cornerstone of our planning system. We commend Bedford Council's commitment to maintaining an up to date Local Plan and the efforts they have made to open up the plan making process for the involvement of local people.

Nevertheless, we do have concerns about the choice to this consultation process over the summer months. Whilst the consultation timescale has been extended over a 12 week period, we do feel that this is less than ideal and should be avoided in future.

There are many aspects of the draft plan that we support. However, the context for the draft plan in terms of national planning policy is complex and problematic. The key objections that CPRE Bedfordshire expresses in this consultation response are very much focussed on the following aspects of national planning policy;

- **The government guidance on the Standard Method** for assessing housing need and calculating the housing target upon which the plan is based puts Bedford in an anomalous position. The government is insisting that local planning authorities calculate housing targets through a formula that uses out of date data from the Office for National Statistics. This has a huge impact on the calculation of housing need for Bedford Borough and results in a massively inflated and unjustified target for future housing growth in this draft plan.
- **The government's announced intention to deliver a Spatial Framework for the Oxford-Cambridge Arc by January 2023** undermines the credibility of Bedford's 2040 plan making process. The government's intention is to use the Spatial Framework to plan for the 'right level of housing growth' in the Arc and to 'identify the most sustainable locations for new homes.' It surely makes much more sense to attempt to get special dispensation from the government to delay the required submission date for the 2040 plan so that the timescale can be properly aligned with the development of the Spatial Framework.

## **Key website links**

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

<https://edrms.bedford.gov.uk/OpenDocument.aspx?id=UD8zSRxBPNPiWCWZhdO1TA%3d%3d&name=LOCAL%20PLAN%202040%20DRAFT%20PLAN.pdf>

<https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

<https://www.gov.uk/government/publications/planning-for-sustainable-growth-in-the-oxford-cambridge-arc-spatial-framework/planning-for-sustainable-growth-in-the-oxford-cambridge-arc-an-introduction-to-the-spatial-framework>

## **Contact details**

Please use [info@cprebeds.org.uk](mailto:info@cprebeds.org.uk) in the first instance.

# **CPRE Bedfordshire consultation comments shown by chapter and paragraphs from the draft plan**

## **1.0 Introduction**

### **Para 1.5 - SUPPORT**

The proposal to set the timescale for the plan to 2040 is supported. A 2040 plan creates a good balance by 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.

### **Para 1.6 - OBJECT**

In the past there has been a lack of transparency on the part of Bedford Borough Council regarding the way that the Council has engaged in the government's OxCam Arc Strategy. In this draft plan 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. However, we are concerned that there is some inconsistency and lack of clarity in the way the plan describes the government ambition for one million new homes by 2050 across the OxCam Arc and the Council's attitude towards this ambition.

The Council is a signed-up partner in the 'The Oxford-Cambridge Arc Government Ambition and Joint Declaration between Government and Local Partners' but to our knowledge there has never been any open debate on the subject in any public Council meeting. CPRE Bedfordshire believe this represents a serious democratic deficit and undermines confidence in the Council's Local Plan process.

The Joint Declaration should be added as one of the supporting documents for the Local Plan. Publishing the document is key to an open democratic process and would provide residents with full details of precisely what the Council has signed up to with Government.

The past lack of transparency on matters associated with OxCam has already caused acute embarrassment for the Council in the recent consultation on East West Rail, where the Council's lack of transparency and engagement with local people about the development of their position in supporting for Route E was exposed. As a result, the Mayor and senior elected members of the Council embarked on a major effort to make up for lost ground through a series of virtual meetings with Parish Councils. This culminated in a special meeting of the Full Council where the subject was debated and a huge groundswell of opinion in opposition to the Council's support for EWR Co's preferred route became clear.

CPRE Bedfordshire is concerned that a similar situation now applies in regard to the housing growth implications associated with the OxCam strategy where we find it difficult to be confident that the Council is being fully candid and transparent. The Council claims to have no knowledge of how the OxCam strategy housing growth implications will impact in Bedford Borough. If this is the case, then it casts serious doubt over the credibility of the development of this local plan.

The Council is a member of the Central Area Growth Board. The Board was established over 3 years ago to provide the strategic leadership that will enable planning for economic transformation across the central area of the Oxford to Cambridge Arc. The Central Area Growth Board is a Joint Committee under s101 (5), 102 Local Government Act 1972.

One of the purposes of the board, as described in its Terms of Reference is; 'To seek to establish Common Planning Areas to produce an integrated and holistic approach to strategic planning for employment, housing and infrastructure that builds on Local Plans, Local Transport Plans and Strategic Economic Plans.'

CPRE Bedfordshire are not closely familiar with the workings of such a body, although we believe that the Oxfordshire Growth Board has been instrumental in coordinating the agreement of a 'Growth Deal' for Oxfordshire. We would like to know if the Central Area Growth Board is in the process of negotiating a similar agreement with the government for the central area. It is surprising the draft plan makes no mention at all of this body and its activities.

As a key partner in the OxCam Arc Strategy we would like to see the Council challenging the ambition for one million new homes by 2050 as unsustainable and unnecessary.

We would also like to see the Council making strenuous demands upon central government to make an agreement that the current expectation to submit a new local plan for January 2023 should be suspended pending the outcome of the OxCam Arc Spatial Framework and that the Council's Local Plan 2030 should be recognised as being up to date until the implications of the Spatial Framework can be fully taken into account.

#### **Paras 1.7 to 1.10 - OBJECT**

Para 1.7 states that the Joint Declaration is 'silent on the numbers', but this is inconsistent with para 1.6 which reports the government's ambition to deliver one million new homes by 2050. The fact that the Government apparently no longer wishes to mention the fact that it has an ambition to build one million new homes across the Arc. This appears to be because to say so is now toxic as the public begin to realise what one million homes really means, i.e., 20 cities the size of Cambridge across an Arc 85 miles long. It is by no means clear that building one million new homes is no longer the government's ambition.

If one million new homes is no longer the ambition of Government and the local authorities and LEPs that signed up to the Joint Declaration, then they should all state that the Joint Declaration should be revised to show this.

The comments in para 1.7 to 1.10 indicate that the Council's stated position is to support the proposition that achieving the Arc's full economic potential will demand collective determination over the long-term, to "deliver significantly more homes in the Arc." This seems to imply that the Council figure for future housing requirements of 1,275 dwellings per year, as calculated in this draft plan according to the Standard Method, will need to be substantially increased to accommodate the implications of OxCam.

In its present form this would write into council policy the Council's support for the OxCam

Arc ambition to deliver one million new homes by 2050 and acceptance that this will involve a significantly higher housing requirement for Bedford than the housing requirement put forward in this local plan.

CPRE Bedfordshire strongly object to the implications of these paragraphs as, for reasons stated later, we already believe that the figure for future housing requirements, calculated according to the Council's interpretation of the government Standard Method, of 1,275 dwellings per year, is excessive and unjustified.

We have arrived at this understanding through a process of deduction. In our view the implications of paras 1.6 to 1.10 being written into council policy are not clear and transparent.

CPRE Bedfordshire believes that the Council should be challenging the implications for significant additional housing growth required by OxCam and should therefore revise these paragraphs accordingly.

If the Council is not willing to challenge these expectations, the Local Plan should at least be revised to highlight more clearly the implications of OxCam on Bedford's future housing requirement.

#### **Para 1.46 to 1.51 – OBJECT**

CPRE Bedfordshire supports and commends the Borough Council's positive approach to Neighbourhood Planning.

We support what appears to be a recognition that current expectations for housing growth delivery on Key Service Centres and Rural Service Centres should not be added to in this plan. It is our view that the new housing to be delivered through Neighbourhood Plans for Local Plan 2030 should be allowed to mature during the plan period to 2040.

We look forward to seeing the Borough Council continuing to demonstrate their support for neighbourhood plans by determining future planning applications according to neighbourhood plan policies where these are in place.

However, we continue to hold major concerns about the share of the overall target of around 2,260 dwellings to be contributed by the Key Service Centres which we believe should be reduced by at least 50%. Our views on this are explained further in our comments on paras 3.1.to 3.5

#### **Para 1.52 – OBJECT**

CPRE Bedfordshire believe that the Council should not acquiesce with the uncertainties resulting from the timing of the emerging Oxford to Cambridge Arc Spatial Framework. As stated earlier, we believe the Council should act with urgency to reach agreement with the government to suspend the submission date for this local plan until the requirements of the Spatial Framework are made known.

Without such an agreement, the Council and the local communities' ability to maintain control over the selection of locations for growth through this local plan is seriously compromised.

## **2.0 Vision & Objectives**

### **Para 2.1 – OBJECT**

CPRE Bedfordshire believe that the Council's vision is unacceptable because, as said above, the uncertainties resulting from the timing of the emerging Oxford to Cambridge Arc Spatial Framework undermine the credibility of the draft plan. As stated earlier, we believe the Council should act with urgency to reach agreement with the government to suspend the submission date for this local plan until the requirements of the Spatial Framework are made known. Without such an agreement, the ability of the Council and local communities to maintain control over the selection of locations for growth through this local plan is seriously compromised.

The Local Plan Vision fails to recognise the importance of the "River Great Ouse and its Valley Area" right across the Borough from its point of entry near Turvey to where it exits the Borough in the east. This is a serious omission that should be remedied.

The river and valley area is the single most important environmental feature in the Borough bar none, and an area where very substantial biodiversity improvement can be achieved very quickly. It is the "Jewel in the Borough's Crown" across its entire length in the Borough, and not simply as a feature of the Town Centre as is often stated by Borough policy makers. The absence of any recognition of this in the Local Plan gives the strong impression that the Council is preparing, as part of its Ox-Cam commitments, to allow substantial developments in or near the river and valley area.

The Council should state clearly and positively in the Local Plan 2040 that the "Protection and Enhancement of the River Great Ouse and its Valley Area" right across the Borough is one of its key objectives and that biodiversity improvement in the river valley area will be a primary focus of its Environmental and Climate Emergency strategy.

### **Para 2.2 – SUPPORT with comments**

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. However, without clearer and more 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.

### **3.0 Growth and spatial strategy options**

#### **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.

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.

##### Key Rural Service Centres

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 ONS data. This would allow for the current expectations for new housing delivery from the Key Service Centres, currently totaling 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 particularly affordable homes and social housing. However, these huge numbers are based on 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 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.

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.

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 view on the draft Local Plan housing requirement**

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 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.

A CPRE Bedfordshire spreadsheet with the detailed comparisons is attached at the end of this document as appendix 1.

### **Paras 3.10 to 3.14 – COMMENT**

#### **Growth strategy options**

The spatial strategy options put forward in the draft plan offer a helpfully wide range of choices for consultees to comment on.

The following principles should apply to 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.

- Developments should be delivered in a way that maximises environmental protection and enhancement opportunities
- Full weight should be given to the views of parish councils and local residents

### **Paras 3.15 to 3.17 – OBJECT**

#### **Emerging preferred development options**

CPRE Bedfordshire strongly object to the proposal for 10,000 homes at Denybrook Wyboston. The development proposal put forward in the call for sites stretches across a vast area of open countryside from Colmworth to St Neots. The land in question is Grade 2 Best & Most Versatile Agricultural land. Any major development proposals on Grade 2 Best & Most Versatile Agricultural land should be refused. This includes Twinwoods which is entirely on Grade 2 land except for a small area of the old MOD site.

CPRE Bedfordshire believe that the Council's emerging growth strategy options are fundamentally flawed because they are based on a housing requirement figure which is excessive and unjustified for the reasons set out in our comments on paras 3.1 to 3.5 to above.

If the Council were prepared to challenge the use of out of date ONS data, which results in an inflated housing requirement figure for Bedford at 1,275 dwellings per annum, accurate up to date ONS data from the 2018 Housing Formation analysis produces a housing need requirement for the Borough which would be very similar to the current Local Plan 2030 level at 970 dwellings per annum.

A housing requirement figure calculated on this basis would obviate the need to include large scale strategic allocations on greenfield sites such as the site at Denybrook, Wyboston.

### **Paras 3.18 to 3.25 – OBJECT**

#### **Transport**

There is a complete absence of any recognition of the need for a sustainable network of safe segregated cycle routes across the Borough - e.g. North South linking the Wixams (bridging the A421) to Milton Ernest through the centre of Bedford.

There is also no mention of a safe segregated cycle route to Bedford Station - it is deeply unsatisfactory that there is still no segregated cycle route to Bedford station from any direction.

Cycling is the way forward at a time of Climate Change and Biodiversity Loss - it will improve the health and wellbeing of residents

## **5.0 Town Centre & Retail Policies**

### **Paras 5.1 to 5.29 - SUPPORT**

#### **Town Centre & Retail Policies**

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.

## **6.0 Employment**

### **Para 6.8 – SUPPORT**

#### **Employment**

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.

## **7.0 Development management policies**

### **Paras 7.30 to 7.40 – SUPPORT with comments**

#### **Natural environment policies**

The draft plan Policy NE1 –Environmental Net Gain is welcomed as an indication of the way the Council is setting out its approach to delivering biodiversity net gain on development sites. The Bedfordshire Natural Capital Assessment supporting document which provides a detailed natural capital (habitat) basemap for Bedford Borough, is noted.

However, it is not clear to us how the delivery of biodiversity net gain will work in practice and whether this will be achieved through further policy development by the Council or whether it is intended that this will be delivered through the net environment gain metric, referred to in para 7.40, which is to be developed from the Arc Environment Strategy. Further explanation in this respect would be welcome.

## 8.0 Position statements

Paras 8.36 and 8.37

### Open Spaces

The Council should insist that all open green space within new housing developments should be handed over to Town & Parish Council's for long term maintenance and not held onto by developers who charge residents much higher maintenance costs. There have been many recent complaints from Parish Council's and residents regarding this practice.

This is likely to be the new leasing scandal as developer's eventually sell on their rights to 3rd parties who will rapidly increase costs to residents.

### Appendix 1 - Number of new homes to be delivered per year by Local Authority calculated using the Government's "Standard Method" Algorithm

Data source: Lichfield Planning consultancy

	Target of new homes to be delivered	
<b>Bedford Borough Council</b>	<b>1275</b>	<b>Difference between other LA and Bedford BC</b>
<b>compared to:</b>		<b>Bedford's target is:</b>
<b>Cambridge City</b>	<b>658</b>	<b>93% higher</b>
<b>East Cambridge</b>	<b>597</b>	<b>114% higher</b>
<b>Fenland</b>	<b>538</b>	<b>137% higher</b>
<b>Huntingdonshire</b>	<b>976</b>	<b>30.6% higher</b>
<b>South Cambridgeshire</b>	<b>1085</b>	<b>17.5% higher</b>
<b>Oxford City</b>	<b>603</b>	<b>111% higher</b>
<b>Cherwell</b>	<b>756</b>	<b>69% higher</b>
<b>South Oxfordshire</b>	<b>608</b>	<b>110% higher</b>
<b>Vale of White Horse</b>	<b>661</b>	<b>92% higher</b>
<b>West Oxfordshire</b>	<b>563</b>	<b>126% higher</b>
<b>North Hertfordshire</b>	<b>973</b>	<b>31% higher</b>
<b>East Northamptonshire</b>	<b>457</b>	<b>180% higher</b>
<b>Kettering</b>	<b>526</b>	<b>142% higher</b>
<b>Wellingborough</b>	<b>348</b>	<b>266% higher</b>