

CPRE Bedfordshire's initial comments on

Bedford Borough Council's (BBC's) Draft Local Plan 2035

The following is an early summary of CPRE Bedfordshire's position regarding BBC's Draft Local Plan 2035 consultation.

It is intended for both CPRE members and non-members who have contacted us asking for our thoughts. CPRE Bedfordshire's detailed and comprehensive final response to the consultation will be submitted to BBC prior to the deadline on the 9th June.

1. The overall housing numbers are inflated

1.1 CPRE Bedfordshire does not accept BBC's view that it needs to build 19,000 new homes over the period to 2035. This is equivalent to building 5 new towns the size of Ampthill (4,000 homes). The number is hugely inflated and driven not by the needs of local residents (Local Need), but by BBC's fear that if they do not agree with Government (DCLG) housing estimates for the Borough, then their Local Plan will be rejected by a government appointed Inspector when it is submitted for approval. Demographic statisticians and the Council's own consultants agree that the DCLG estimates are quite unsuitable for long term planning - See Local Plan **Strategic Housing Market Assessment** page 7 para 4.

1.2 Over 40% of new homes are being built for people moving into the area. Through a Freedom of Information (FOI) request made to BBC in April 2017, CPRE Bedfordshire has established that of the 19,000 new houses, 41% are for people that BBC estimate will migrate into the Borough from elsewhere in the UK. So the proposed housing numbers are far in excess of Local Need which is around 11,000 new homes. We recognise the necessity to plan for some level of migration into the Borough but 41% is huge and quite unsustainable. The evidence to support it does not withstand scrutiny.

30 years of standing up for Bedfordshire's countryside 1987-2017

CPRE Bedfordshire is the Bedfordshire Branch of the Campaign to Protect Rural England which exists to promote the beauty, tranquillity and diversity of rural England.

We advocate positive solutions for the long term future of the countryside.

1.3 Lack of employment opportunities in the Borough

BBC's **Strategic Housing Market Assessment updated October 2016**, which forms part of the Local Plan 2035 background papers, shows that 19,000 houses will generate in excess of 11,400 workers.

However, the paper notes that the highly respected **East of England Forecasting Model** produced by Cambridge Econometrics estimates that the number of workers that will be needed over the period is only 5,500.

This means that this level of housing will generate an additional 5,900 workers who will have to commute out of the area to places like Milton Keynes, London or Cambridge to find employment. Encouraging this level of additional commuting is unsustainable when the local road and rail infrastructure is already struggling to cope at peak times.

1.4 One million homes in the **Oxford - Milton Keynes - Bedford - Cambridge Corridor**

A further factor that we believe is driving the inflated housing numbers is the fact that BBC has supported, as part of its submission to the government's National Infrastructure Commission (along with Central Bedfordshire Council and other local authorities), the development of 1 million new homes and a population increase of 1.6 million people across the **Oxford - Milton Keynes - Bedford - Cambridge Corridor**. Full details of this massive proposed increase in development can be found on the home page of our website:

www.cprebeds.org.uk

What impact are these proposals having on BBC's Local Plan 2035 housing figures?

2. **CPRE Bedfordshire's own estimates of new housing required**

CPRE Bedfordshire is still analysing the background data supplied by BBC as part of their Draft Local Plan 2035 but our current estimate is that BBC should be planning for around 15,000 new homes - 4,000 less than that currently planned. This is a substantial reduction from that proposed by BBC but it is more than sufficient to cater for Local Need and includes a far more sustainable assessment of the level of inward migration.

Levels of outward commuting will also be reduced and commuting is the least sustainable of all options. This is recognised by BBC themselves in their Draft Local Plan. Since BBC has already identified that it has existing planning permissions and "windfalls" to cover 10,897 new homes, if these lower, more realistic targets are used, only a further 4,103 homes need to be allocated.

3. Allocation of Housing numbers

3.1 Group 1 Villages - Key Service Centres - Sharnbrook (600 homes), Clapham, Great Barford, Bromham and Wilstead (500 homes each).

With more realistic housing numbers overall, the numbers of new homes necessary to be allocated to these communities can be substantially reduced to be far more sustainable - less than 200 each. In some cases the allocations proposed in the Draft Local Plan represent increases of 50% or more to the size of the communities. This will have substantial repercussions.

The decision on allocations seems to have been made on the basis of the minimum numbers needed for a new school without any serious thought being given to the infrastructure issues that developments of this size will have - not only on the community itself but also on the surrounding villages.

The impact on the rural road network will be very substantial with the large increase in car movements that these developments will encourage. An average of at least 2 cars per household needs to be taken into account, generating a minimum of 1000 additional vehicles per settlement.

These settlements will not only create additional north/south traffic on roads like the A6 but also, east/west traffic north of Bedford, where the rural road network simply can't provide additional capacity without destroying the countryside and having a major adverse impact on smaller local villages. In addition, cars will rat-run through smaller villages in order to access the principal A-roads. In some cases, like Sharnbrook, the village itself already has very serious traffic issues on narrow principal through-roads.

3.2 Proposed new towns in North Bedfordshire

The draft Local Plan 2035 is considering new towns of between 4,000 and 10,000 new homes plus employment sites.

The possible sites are Sharnbrook (with a development which would expand the current village to the size of a Town), **Thurleigh Airfield, Twinwoods (near Milton Ernest) and Wyboston**. CPRE Bedfordshire understands that there is now also the possibility of merging the Twinwoods and Thurleigh Airfield sites.

As we have said earlier, CPRE Bedfordshire does not accept that the 19,000 new homes proposed by BBC are needed.

And we reject totally the proposals for New Towns in the north Bedfordshire countryside. The case simply hasn't been made.

We wonder what is driving these proposals. According to their Plan BBC have allocated 2,200 new homes to be provided by new settlements. However they are considering developer's proposals for new towns of between 4,000 and 10,000 new homes. A totally different scale altogether.

3.3 The proposed new towns are not sustainable

Building new towns in the middle of the North Bedfordshire countryside is not sustainable. It will cause huge infrastructure issues and will have a seriously detrimental impact on the countryside:

A) Inadequate Road infrastructure. The proposed settlements will generate huge traffic volumes both car and HGV.

There is a complete absence of adequate east/west transport infrastructure north of Bedford.

North/South traffic will use the A6 which already suffers from considerable congestion during peak times at the new A6/western bypass intersection at Bedford and north towards Kettering and the A45 junction.

B) Lack of Sustainable Transport Infrastructure

There are no proposed sustainable rail links integral to any of the sites, particularly not for east/west travel, or guided bus routes.

C) Massive cost to supply electricity and other utilities

BBC has already identified that to supply electricity to the proposed sites on the scale required will cost 10s of millions of £ due to the cost of constructing new infrastructure which will have to link into the grid at some considerable distance away.

There are already very serious issues regarding the supply of drinking water in what is already one of the driest parts of the country.

D) Impact on the Great Ouse valley area and the important “Wolds” countryside throughout north Bedfordshire

The Great Ouse Valley and the surrounding countryside is a very important area for biodiversity. It is immensely valuable in terms of landscape as well as providing tranquil areas for quiet relaxation and well-being. The rural road network criss-crosses the length of the river across historically important bridges which flood regularly during winter and through rural villages which are extremely vulnerable to environmental degradation through increase traffic, both car and HGV.

There will not be a community rural or urban, across north Bedfordshire that will not be adversely affected if one or more of the proposed new towns were to be constructed.

4. New East/West rail - a sustainable alternative

Outline proposals for a new sustainable East/West railway linking Oxford, Milton Keynes, Bedford and Cambridge have already been accepted by government.

CPRE Bedfordshire believes that it is nonsensical to consider proposals for new towns in the countryside north of Bedford which fail to offer modern, integrated, sustainable transport links when plans for the new sustainable East/West rail link running south of Bedford are at an advanced stage.

CPRE Bedfordshire proposes that no decisions on new settlements should be taken before the route of this new railway is clarified and full and detailed impact assessments are undertaken.

It is only then that decisions on the location of housing sites can be taken with any degree of confidence that the proposals are sustainable.

However, as we have previously stated, our current calculation of housing need indicates that no new settlements of the size being considered by BBC (see 3.2 above) are required over the Local Plan 2035 period.

CPRE Bedfordshire May 2017

Notes:

CPRE has long argued that current Government guidelines to local authorities regarding the development of Local Plan housing assessments has led to proposals for hugely inflated housing numbers. See our leaflet **Set up to Fail - why flawed numbers threaten our countryside** at this link:

<http://www.cprebeds.org.uk/resources/housing-andplanning/item/2254-set-up-to-fail-our-countryside-threatened-byflawed-housing-targets>

As part of their new Housing White Paper the Government has said that they will be consulting on new ways for local authorities to determine housing need.

BBC make reference to this consultation on page 4 para 2.3 of their “Local Plan 2035 Consultation Paper 2017”.

We understand that the government consultation on the determination of housing need will now take place after the election.

CPRE at a national level, will be submitting proposals to this government consultation. Our proposals are intended to ensure that local authorities are not put under pressure to plan for hugely inflated numbers of new homes. We hope that the government will agree to CPRE proposals and that this will result in BBC reducing the number of new homes in their Local Plan 2035 to more sustainable levels.

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CPRE Bedfordshire urges people to respond to the Local Plan 2035 Consultation by the latest - 9th June 2017 either by emailing:
planningforthefuture@bedford.gov.uk

(Please ensure that you include your full name and address including post code).

Or, by using the online forms which can be found using the following link:

http://www.bedford.gov.uk/environment_and_planning/planning_town_and_country/planning_policy_its_purpose/local_plan_2035.aspx

Letters can be sent to:

Local Plan 2035 consultation

Planning Policy Team

Bedford Borough Council

Borough Hall

Bedford

MK42 9AP

We also recommend that letters and emails should also be sent (copied) to local MP's.