



Bedford Borough Council – Local Plan 2032 Consultation Paper Response Form

Please use this form to respond to the questions raised in the Local Plan 2032 Consultation Paper. It should be read alongside the background documents referred to; copies of the documents are available to view on the Council's website at www.bedford.gov.uk/localplan2032 or in hardcopy at our Customer Service Centre (at 2 Horne Lane, Bedford MK40 1RA) and all libraries in the borough during normal opening hours. Documents are also available at Rushden, St Neots, Biggleswade and Flitwick libraries outside of the borough.

Please send your response electronically if possible or as a WORD document via email to planningpolicy@bedford.gov.uk

Alternatively responses can be sent by post. Please attach a stamp and send to:

Bedford Borough Council
Local Plan 2032 consultation
Planning Policy Team,
Borough Hall,
Bedford, MK42 9AP

PLEASE DO NOT SUBMIT COMMENTS IN MORE THAN ONE FORMAT OR SEND TO MORE THAN ONE EMAIL ADDRESS. If you have submitted comments electronically you do not need to print and post them.

All responses (electronic and paper) must be received by 5pm on 14 December 2015.

Your contact information will be kept on the Planning Policy database so that we can keep you up to date about this and other planning policy documents. We do not share contact details with other parts of the Council or other organisations. If you do not want your details to be retained (which would mean no further updates from us about the Local Plan 2032) please let us know by sending an email to planningpolicy@bedford.gov.uk

All responses will be made public.

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If you are using an agent, who would you prefer any correspondence to go to?

(Please mark X one box only)

Contact agent

☐

Contact client

☐

Contact both

☐

Your interest (Please mark X one box only)

Land owner

☐

Resident

☐

Consultant

☐

Agent

☐

Other

☒

Please specify 'Other' (please write in)

CPRE Bedfordshire is a local Bedford based environmental charity.

We are affiliated to the National CPRE organisation and campaign for a sustainable future for the Bedfordshire countryside a vital but undervalued economic and social asset. We highlight threats and promote positive solutions. We believe that a beautiful, tranquil, diverse and productive countryside is fundamental to people's quality of life, wherever they live

Q1 Do you have any comments on the draft vision and or objectives?

If you think they should be changed please tell us how. (please write in)

a). At the Issues and Options Stage of the Local Plan CPRE Bedfordshire commented that the Vision and Objectives were almost entirely focused on the major urban area of Bedford with very little emphasis on rural areas and the natural environment. There has been some slight improvement with this new draft but we would still like to see a further increase in focus on the countryside and on rural issues. There is so much more to Bedford Borough than Bedford itself that makes the Borough (and in fact Bedford) an attractive place to live, work, shop and do business in. That needs to be recognised.

b). Bedford Borough Landscape Character Assessment.

There needs to be a specific reference in the Vision to the recently adopted "Bedford Borough Landscape Character Assessment" as a criteria for development. We are concerned that there is no mention at all of this very important document anywhere in the draft Local Plan.

CPRE Bedfordshire believe that the inclusion of reference to the Landscape Character Assessment is particularly important in the case in Bedford Borough where the majority of the rural area carries no formal designation (e.g. Green Belt or AONB). In this regard we are talking about the wider rural area

but we have particular concerns about the River Ouse, its valley and the areas surrounding it as it meanders across the Borough.

c). River Ouse, the valley and surrounding areas.

In the Vision, much is made of The Embankment, The Forest of Marston Vale and the Bedford River Valley Park but from the point of view of landscape, biodiversity and overall value to the Borough, the real jewel in the crown of Bedford Borough as opposed to Bedford itself, is the whole of the River Ouse, its valley and the areas surrounding it; from the point it enters the Borough until the point it leaves it. It is incomprehensible that the draft Plan makes absolutely no specific mention of this amazing asset either in the Vision or Objectives.

d). Intrinsic character and beauty of the countryside

When reading the Vision and Objectives it appears that the countryside and natural environment are looked upon simply as a means to development of one sort or another. **The NPPF (para 17) calls upon Local Authorities to recognise the “Intrinsic character and beauty of the countryside”. CPRE Bedfordshire urges the council to use this wording specifically in the vision and objectives.** Thereby recognising the value of the “undeveloped” countryside for its own sake. That it is as important a feature as any other mentioned in the Local Plan when it comes to attracting new businesses to the Borough for example.

e). The development of appropriate employment in rural areas

Where the Vision and Objectives talk about the development of employment opportunities in rural areas CPRE Bedfordshire would like the words “appropriate employment opportunities” to be used instead. Sustainability is a theme running throughout the NPPF. Creating employment in rural areas that would generate an increase in commercial vehicle traffic on rural roads and through villages for example, is in our view an unsustainable practice and not appropriate in a rural environment.

f). New objective

CPRE Bedfordshire would like to see the Landscape Character Assessment used as an umbrella document for a specific objective - **to develop a strategy for the improvement and protection of the countryside, the enhancement of the rural environment generally and increased biodiversity.**

Q2 Do you have any comments on the study ‘Objectively Assessed Need for Bedford: An Evidence Base for Establishing Overall Housing Need’, the requirement for new dwellings 2012 - 2032 (17,367) or the way that the number of dwellings to be included in the plan to meet Bedford Borough’s housing need has been established (shown in Table 1)? (please write in)

a). CPRE Bedfordshire believes that the 17,367 new homes proposed by the Borough Council over the 20 year period up to 2032 is highly excessive and unsustainable.

b). In order to achieve these inflated housing numbers the Council has persuaded the consultant that prepared the “Objectively Assessed Need for Bedford”, Opinion Research Services (ORS), that the official 2011 census understated the population of the Borough compared to the predicted population that was previously forecast by the Office of National Statistics (ONS). This has led ORS to increase the resident population by 4,000 people.

c). We do not agree with the analysis conducted by the Council and ORS that led to ORS increasing the Borough population. We believe that the difference pointed out by the Council is far more likely to be due to a range of other factors and primarily a mis-estimation of “International Migration”.

d). This highly unusual and, in our view, totally unjustified intervention by the Council led ORS to produce two different scenarios for housing (see figure 31, page 42 of their report).

The first scenario uses “Official Population Data” - this calculates the range in the number of new dwellings required as between 639 per year and 807 per year.

The second scenario uses the “Adjusted Population Data” which has increased the population by 4,000 people – this calculates the range of new dwellings required as between 768 per year and 889 per year.

The second scenario shows an average increase of 15% over the “Official Population Data” version.

ORS, presumably on instruction from the Council, has then gone on to use the higher of the two scenarios as the basis for achieving the final housing requirement of 17,367.

No final forecast of housing need has been calculated using the “Official Population Data” scenario.

However, other earlier work commissioned from a different company (Edge Analytics) by the Council and published in December 2013 entitled “**Demographic Forecasts 2012-2032**”, takes a completely different view recognising the well proven methodology of the census.

Edge Analytics recognise the difference between forecast population statistics and the actual official 2011 census population (see their Figure 5, para 2.8, page 8) but say that it is predominantly associated:

“....with the mis-estimation of international migration....” (See para 2.10)

The report goes on to explain this in more detail on page 9 and ends by saying **para 2.13: “..... The integration of the “other unattributable” element within international migration results in a relatively small impact of this component over the historical period.”**

Edge Analytics then go on to produce their own starting point estimate of housing need of between 650 and 815 dwellings per year (see page 34, para 6.15 and Table 9 on page 33).

This is, amazingly, almost identical to the lowest range (i.e. the 1st scenario) in the ORS “Objectively Assessed Need for Bedford” and is wholly consistent with the assessment outlined above.

Removing the unreasonable and unnecessary assumption about incorrect census data reduces the housing need by over 3,400 houses.

e). In addition, the Site Selection Methodology excludes small sites with less than 5 dwellings thereby ignoring an important source of new homes. The Council typically gets 50 additional homes per year and the selection methodology makes it very likely this figure will be exceeded during the Local Plan 2032 period.

Therefore, it is reasonable to allow for an additional 1,000 to 2,000 new homes to appear as ‘windfalls’, reducing the overall housing need to less than 13,000 new homes.

f). CPRE Bedfordshire believe that the Council should have used the “Official Population Data” when calculating their housing need. Specifically, the lower end of the projection i.e. around 639/650 dwellings per year.

Furthermore they should have taken into account an estimate for small sites (less than 5 homes) and other windfall housing development.

This would have led to a Housing Need of around 13,000 new homes over the period to 2032. This figure would be sufficient to cater for “Local Need” and a much more reasonable percentage of “Inward Migration”.

We are already building a huge numbers of new homes – The Wixhams new town, West of Kempston, around Wootton and in Bedford town itself.

BBC has already allocated sufficient land to build around 13,000 new homes and so does not need the additional 4,500 homes it is proposing to find space for in Table 1.

g). It may be that the Council are of the view that it could be difficult to persuade a Planning Inspector of the validity of their Local Plan 2032 if housing numbers do not approach the DCLG projection of 17,600 new homes required over the Plan period.

In our opinion this view is totally unjustified and not supported by any credible evidence.

Demographic statisticians agree that these DCLG figures are based on short term migration trends, are not appropriate for long term planning and are indicative only. This is confirmed by comments made by Opinion Research Services (ORS) in the “Objectively Assessed Need for Bedford”.

h). Many Local Authorities have struggled to provide evidence of a “**5-Year Supply of Deliverable Housing Sites**”. This is not the case with the Council who have proved in the papers associated with this Local Plan 2032 consultation that they have a massive 6.3 year supply of deliverable housing sites.

This 26% “over supply” indicates the already very high level of house building in the Local Plan 2032.

i). Housing Market Area

A Housing Market Area as defined by Planning Practice guidance is "... a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work...". CPRE Bedfordshire is very surprised indeed to see, from the paper "Defining the Housing Market Area", that London has been excluded from Bedford's housing market area. This bears no relation to the actual situation and the logic of this analysis is therefore very difficult to comprehend.

Q3 Do you have any comments on the study 'Economy and Employment Land Study' or the requirement for new jobs 2012-2032 (15,500)? (please write in)

a). The authoritative and reliable East of England Forecasting Model which has been produced for a number of years by Oxford Economics has predicted that total employment growth in the Borough will be between 7,300 and 11,200 extra jobs over the 20 year period. This is an average of around 9,400 new jobs. Their model assumes a reduction in the unemployment rate to 2.6% over the same period. So the 9,400 new jobs is dependent upon one of the best rates of unemployment ever achieved.

(Note: the EEFM uses official 2011 Census data – it seems that ORS is the only one that doesn't!)

b). Against this the inflated increase in population of the Borough over the Plan period predicted by ORS of +31,000 people (due to the adjustments they and the Council made to the 2011 census), will mean that an additional 15,500 extra workers can be expected from the 17,367 new homes proposed (see pages 63 and 64 of the OAN for Bedford).

c). There will therefore be a shortage of 6,100 local employment opportunities for the new residents. This will lead to a massive and unsustainable increase in commuting across the board but principally to London, Milton Keynes, Northampton, the Cambridge area and Luton.

d). CPRE Bedfordshire believes that these figures highlight the unsustainability of the proposed Plan. Commuter trains and the motorway, national, urban and rural road networks, are already full to breaking point at key times. New roads under construction or currently planned will provide only short term solutions.

The NPPF demands sustainable growth and, as these employment figures show, this Plan is very far from that.

Q4 Do you have any comments on the Bedford Retail Study or the Town Centre Topic Paper? (please write in)

a).Cycling – a north/south route

CPRE Bedfordshire have commented before on sustainable transport and in particular cycling. The Ouse river valley as it passes through Bedford has provided our town with an amazing "natural" off-road cycle route. This has recently been expanded to include the new developments to the west of the town in Biddenham and beyond. This is excellent and the proposed new cycling/walking bridge as part of the Riverside North project will improve the facilities for cyclists once again. All, of this will be a major benefit to the regeneration of the town centre.

The Green Wheel around the town is also an excellent idea.

Our successful neighbours Oxford and Cambridge have high levels of cycling and if we wish Bedford to become a modern community that people wish to live in then we need to emulate this passion for cycling. It will also improve the health of our citizens.

We now need a bold, key-note cycling project to take the town forward again.

In our view this should be a completely safe off-road/protected cycle path stretching from Milton Ernest in the north to Wixhams in the south by the most direct and fastest route possible.

It would further reduce traffic in the town, encourage families with children to visit the town centre and people in general to commute for work and pleasure. It would further improve the health of residents and support Carbon Reduction targets.

As important, it would encourage the development of more off-road/protected cycle routes.

b) Retail and Town centre

We wonder, in the age of internet shopping, if the amount of “comparison goods” and “convenience goods” floor space proposed in the Plan will actually be required?

Q5 Do you have any comments on the Commercial Leisure Needs Study? (please write in)

Q6 Do you have any comments on the ‘Settlement Hierarchy’ background paper and the way that the settlements have been grouped together (Table 2)? (please write in)

a). Top down Plan process

The Borough Council is in the fortunate position that their timetable for the Local Plan 2032 has coincided with the fact that a very significant number of communities are also developing their Neighbourhood Plans at the same time.

It is very unfortunate therefore that the “Settlement Hierarchy” has been developed without asking at least those councils currently undertaking their Neighbourhood Plan for their views.

b). CPRE Bedfordshire does not agree with the Settlement Hierarchy as laid out in Table 2.

The Settlement Hierarchy as developed is a very blunt tool indeed reflecting a top down approach.

It fails to acknowledge some very important issues:

(i). The fact that some villages would like to see more development (in some cases significantly more) to ensure that their communities remain sustainable. Conversely other villages may have seen significant development in past years and feel that more would put undue strain on their communities and infrastructure.

(ii). It takes no account of potential infrastructure issues. In the North of the Borough the rural road network is a particular issue. Unlike to the south of Bedford town with the close proximity of the A421 corridor, in the north there is no east west road and there are significant pinch points particularly at bridges many of which are impassable during times of flood.

c). A community led approach would have been better.

Using a bottom up, community led approach the Council would have been able to indicate for example, that a particular village wished to grow but did not have sufficient (or any) land brought forward in the “call for sites”. This may then have stimulated developers or land owners to bring forward land for development to satisfy demand.

Q7 Do you have any comments on the Development Strategy and Site Selection Methodology background paper or the summaries in Table 3? (please write in)

a). Site selection methodology

The NPPF calls for planning authorities to develop specific criteria against which proposals for any development can take place and also to identify land where development would be inappropriate.

We believe that the site selection methodology is lacking in detail and we would like to see the following changes:

(i). **The Bedford Borough Landscape Character Assessment (LCA)** should be used as one of the primary criteria when determining the suitability of sites. This is a key document regarding development in the rural area and its inclusion is in our view essential.

(ii). A clearer statement needs to be made regarding areas that would be considered inappropriate for development and in our view the LCA is the best document to inform this.

b). Inclusion of a further step or key question – impact of the development

We believe that the impact of any new development on the wider area needs to be more fully assessed before development is considered in the rural villages.

As previously mentioned, the rural road network to the north of Bedford town is such that residents of outlying villages often need to pass through other villages in order to access primary routes such as the A6, the Western By-Pass or the A428 for example.

c). The Site Selection Methodology excludes small sites with less than 5 dwellings thereby ignoring an important source of new homes. The Council typically gets 50 additional homes per year and the selection methodology makes it very likely this figure will be exceeded during the Local Plan 2032 period.

Therefore, it is reasonable to allow for an additional 1,000 to 2,000 new homes to appear as ‘windfalls’, reducing the overall housing need.

Q8 Do you have any comments on the Addendum to the Sustainability Appraisal? (please write in)

a). This draft Local Plan is unsustainable

It is clear from the Sustainability Appraisal on page 7 that the high level of new home construction (17,367) proposed in the draft Local Plan 2032 will have a negative effect on some of the most important issues facing our Borough - from Climate Change to the promotion of sustainable lifestyles and the vital conservation of the Borough's important natural environment.

The draft Local Plan does not conform to the NPPF requirement of sustainable growth and the worst of it is that the proposed level of development is both unnecessary and unproven.

b). CPRE Bedfordshire believes that this Local Plan is unsustainable for the following reasons:

- Building huge numbers of new homes for people moving out of London and commuting back as well as commuting to nearer destinations will make congestion on already overcrowded commuter trains and the principal road and motorway networks unbearable.
- The local rural and urban road networks are already seriously overcrowded at peak times and falling into disrepair. New roads being built e.g. western by-pass A6 link, will provide a short term improvement at best.
- This area of Eastern England has very serious problems in supplying the water requirements of current residents let alone the increase proposed by these inflated housing numbers.
- That's without considering the impact on hospitals, schools, etc.
- People moving into the Borough from London will only push house prices higher for local people.
- The vast majority of the new house building in the Council's Local Plan 2032 is planned to take place on open countryside. If this plan goes ahead the quality of life for present and future generations will be irreversibly damaged.

Q9 Do you have any comments about the way growth has been apportioned in Table 4?
(please write in)

a). See comments to Question 6 – the way growth has been apportioned should have been community led not top-down

Q10 Do you have any comments on the draft Local Green Space Selection Methodology?
(At this stage please do not include your comments on the individual local green spaces that Parish Councils and Ward Councillors have put forward as many may not meet the criteria for designation. You will be able to comment on any included in the draft plan at a later stage).
(please write in)

a). In general we feel that provided that the methodology is used with a degree of sensitivity and understanding of the views of local people, then the proposal is acceptable with the exception of tranquillity.

b). Tranquillity - We would like to see a broader interpretation

CPRE Bedfordshire is very pleased to see the inclusion of tranquillity and very much appreciate that it is a difficult concept to define.

In our view, the current definition as included in the draft Plan is little too constrained - "no noise disturbance by traffic or visual evidence of human influences....etc. etc".

We think that the feeling of tranquillity can be experienced for example, in urban parks or allotments, or in rural areas which are sometimes quite close to habitation or roads e.g. on the banks of the river Great Ouse which often has a road running close by.

We attach a copy of a CPRE Briefing Document Number on Tranquillity and refer you to para 5.4 which states:

"5.4 The PPG also states that a *relative* lack of noise disturbance means that areas of tranquillity should be relatively free from noise to the extent that such noise hasn't 'undermine[d] the intrinsic character of the area'. This suggests further interpretation and professional judgement may be required to determine local character and suitable noise thresholds. It also establishes that absolute low levels of (human-caused) noise are not required for locations to qualify as areas of tranquillity."

Please also find links to other LA's who have used tranquillity in their planning processes:

<http://apps.warwickshire.gov.uk/api/documents/WCCC-1014-12>

<http://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/Documents/Quiet%20City%20Project.pdf>

Q11 Do you have any other comments?

With regard to the consultation process we would like to highlight a growing democratic deficit across the Borough but particularly in rural areas.

A Local Plan is very important to residents of the Borough but ensuring that people are aware of the consultation process is becoming more difficult. Local newspapers such as Beds on Sunday or Times & Citizen are no longer delivered directly to individual addresses nor, in the case of small communities, to local churches or pubs for collection.

The majority of residents would not normally access the Borough council's website.

Parish Councils do their best to inform residents but there's a limit to what they can do and the coverage they're able to achieve.

We understand the financial constraints facing the Borough Council but wouldn't it be possible to post (or email) a copy of the 2 page "Local Plan 2032 Planning for the Future" document to the addresses of all council tax payers?

The more people that are aware of the Plan process the better. Residents would then feel as though they have a part to play in the future development of the areas in which they live.

If you would like to put forward a potential Local Green Space or a development site (Call for Sites) for consideration please visit the website www.bedford.gov.uk/localplan2032 for further information and advice.