



Bedford Borough Council – Local Plan 2035 Consultation Paper Response Form

Please use this form to respond to the questions raised in the Local Plan 2035 Consultation Paper. It should be read alongside the consultation paper and technical documents referred to; copies of the documents are available to view on the Council's website at www.bedford.gov.uk/localplan2035 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 planningforthefuture@bedford.gov.uk.

Alternatively responses can be sent by post. Please attach a stamp and send to:
Bedford Borough Council,
Local Plan 2035 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 Friday 9 June 2017.

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 2035) please let us know by sending an email to planningpolicy@bedford.gov.uk.

All responses will be made public.

CONTACT DETAILS

Personal details

Title Mr

Name Gerry Sansom

Job title (if applicable) _____

Organisation (if applicable) CPRE Bedfordshire (Campaign to Protect Rural England)

Address 5 Grove Place
Bedford

Postcode **Mk40 3JJ**

Telephone Number **01234 353331**

Email **info@cprebeds.org.uk**

AGENT DETAILS (if applicable)

Title _____

Name _____

Job title (if applicable) _____

Organisation (if applicable) _____

Address _____

Postcode _____

Telephone Number _____

Email _____

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

QUESTIONS

1a) Do you agree or disagree that one or more of the four new settlement proposals should form part of the development strategy? (Please mark X one box only)

Agree ☐ Disagree ☒

1b) If you disagree, the 2,200 dwellings identified for new settlement(s) as part of the preferred strategy will need to be provided elsewhere: where should the development go instead? (Please write in)

1.1 CPRE Bedfordshire does not agree with Bedford Borough Council's estimate that it needs to build 19,000 new homes over the period 2015 – 2035 and we reject totally the need for new towns in the north Bedfordshire countryside. **See CPRE Bedfordshire's response to Question 11.**

1.2 We do not believe that the case has been made for such large settlements and we wonder what is driving these proposals other than the availability of Government funding from the "Locally Driven Garden Villages and Towns" programme.

1.3 We are also very concerned by commitments already made by Bedford Borough Council and SEMLEP to housing development along the **Oxford – Milton Keynes – Bedford - Cambridge Corridor**. To date, BBC have not advised residents how many of the proposed 1 million new homes that they have committed to across the Corridor will be delivered by the Council.

1.3 According to the draft Local Plan 2035, 2,200 new homes have been allocated to be provided by new settlements. This would equate to 2 medium sized villages. However, the draft Local Plan is considering developer proposals of between 4,000 and 10,000 new homes.

This is development on a totally different scale altogether – massive in comparison.

New settlements on this scale would commit the Borough to very substantial long term housing developments on these sites well into the next Local Plan period beyond 2035 without any shred of evidence to support it.

2a) Do you agree or disagree that the brownfield site opportunity at Stewartby brickworks should form part of the preferred development strategy? (Please mark X one box only)

Agree ☒

Disagree ☐

2.1 CPRE Bedfordshire agrees in principle with the development of the brownfield site provided that:

- a.** High levels of protection are provided to the current settlement of Stewartby and its conservation area.
- b.** The new settlement is of dwellings constructed to the highest quality and design standards, with the objective of it being an exemplar for future new developments in the Borough.
- c.** The new settlement conforms to the Borough Council Open Space SPD Sept 2013 with regard to the inclusion of public open spaces, allotments etc. as a minimum.
- d.** The new settlement should consist of 30% affordable homes i.e. homes for rent and shared ownership.
- e.** The issue of car-parking be taken fully into account at the design stage to avoid the issues currently plaguing some of the larger new developments in the Borough.
- f.** The route of the new east/west railway is clarified before building commences and that the station location is confirmed and any additional funding required committed – avoiding the current situation at the Wixams new town where there is still no railway station many years after development was first agreed.

2b) If not, the 1,000 dwellings proposed at Stewartby Brickworks as part of the preferred strategy will need to be provided elsewhere: where should the development go instead?
(Please write in)

3a) Do you agree or disagree with the principle that all suitable and available sites in and on the edge of the urban area should be allocated? Currently this amounts to 1,988 dwellings. (Please mark X one box only)

Agree ☐ Disagree ☐

CPRE Bedfordshire does not agree that Freeman's Common nor any part of Freeman's Common should be allocated for development.

CPRE Bedfordshire advocates a brownfield first policy where the brownfield sites are in sustainable locations and have the benefit of access to sustainable transport infrastructure.

CPRE Bedfordshire would like to see the "Local Gaps" between the urban area and the surrounding villages maintained and reinforced e.g. between the Bedford urban area and Renhold.

It is very important to maintain the identity of these communities

3b) If you think that not all of this should be allocated for development where should the development go instead? (Please write in)

4a) Do you agree or disagree with the proposed allocation of urban and edge of urban sites listed in table 1 and table 3? (Please mark X one box only)

Agree ☐ Disagree ☐

See our response to Question 3a above.

4b) Are there any sites which you think should not be allocated or any other sites which you think should be allocated and why? (Please write in)

CPRE Bedfordshire does not agree that Freeman's Common nor any part of Freeman's Common should be allocated for development.

5a) Do you agree or disagree with the amount of development identified for the Group 1 villages as part of the preferred development strategy (2,600 dwellings)? (Please mark X one box only)

Agree ☐ Disagree ☒

5b) If not, should the amount be higher or lower, what should the number be and how should the strategy change as a result? (Please write in)

5.1 CPRE Bedfordshire does not agree with Bedford Borough Council's estimate that it needs to build 19,000 new homes over the period 2015 – 2035.

Our estimate for the number of new homes needed in the Borough over Plan period at around 15,000 is much less than that determined by BBC. See our response to Question 11.

5.2 With more realistic housing numbers overall, the number of new homes 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.

5.3 The decision on allocations seems to have been made on the basis of the minimum numbers needed for a new school or new school year entry 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.

5.4 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.

6a) Do you agree or disagree with the list of potential development sites in each Group 1 village (tables 4 – 8)? (Please mark X one box only)

Agree ☐

Disagree ☐

6b) Which sites in Group 1 villages would you prefer to see allocated and why? Which of the options do you prefer and why? Are there other combinations of sites? (Please write in)

6.1 CPRE Bedfordshire believes that local residents should make the decisions on which sites to develop in their community through their Parish Council/Neighbourhood Plan Group.

6.2 CPRE Bedfordshire is very concerned by the method of site selection used by BBC to determine the potential development sites – **See answer to Question 11 regarding the Landscape Sensitivity Study**

7a) Do you agree or disagree with the amount of development identified for the Group 2 villages as part of the preferred development strategy (225 dwellings)? (Please mark X one box only)

Agree ☒

Disagree ☐

7b) If not, should the amount be higher or lower, what should the number be and how should the strategy change as a result? (Please write in)

8a) Do you agree or disagree with the shortlist of sites for each Group 2 village (tables 9 – 14)? (Please mark X one box only)

Agree ☐

Disagree ☐

8.1 CPRE Bedfordshire believes that local residents should make the decisions on which sites to develop in their community through their Parish Council/Neighbourhood Plan Group.

8b) If not, which sites should be included or excluded from the list? Which sites do you think should be allocated in each village to meet the strategy requirement? (Please write in)

9a) Do you agree or disagree with the approach for Group 3 and Group 4 settlements in the preferred development strategy (that rather than having specific sites allocated in the local plan there should be a local plan policy to allow small amounts of development if supported by the local community)? (Please mark X one box only)

Agree ☒

Disagree ☐

9b) If not, how should Group 3 and Group 4 settlements be treated in the development strategy? Do you have any comments on the wording of the draft policy for Group 3 and Group 4 settlements? (Please write in)

10a) Do you agree or disagree with the selection of Local Green Spaces? (Please mark X one box only)

Agree ☐

Disagree ☒

10b) If not, and given the site assessment work that has already taken place, which sites do you think should be removed from or added to the list? (Please write in)

10.1 CPRE Bedfordshire made the following comment when responding to the Local Plan 2032 consultation at which time the draft Local Green Space Methodology was proposed:

“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.”

10.2 It has been quite clear both from our Parish Council members and anecdotally, that when implementing the Local Green Space Methodology in the Draft Local Plan 2035, BBC have been far from responsive to the views of local people and Parish Councils/Neighbourhood Plan Groups.

The NPPF para 77 states quite clearly that the designation should be used “where the green space is **demonstrably special to a local community and holds a particular local significance**.....”.

Far too often, even when local people have demonstrated that a particular Green Space is important to them by for example, voting overwhelming for it in a Parish Council/Neighbourhood Plan survey or consultation, BBC have refused to accept the site as a Local Green Space.

It seems to us that it is not for BBC to override the views of local residents on a matter like this, particularly when a legitimate survey or consultation of residents has been undertaken.

There may be cases where Local Green Space classification is clearly inappropriate and of course, in these cases BBC should make this clear but a decision making process more sensitive to local views is required.

10.3 CPRE Bedfordshire suggests that **the interpretation of the phrase “demonstrably special” used by BBC in its site assessment needs to be reviewed** to be more reflective of the views of the local community.

10.4 Similarly, **the use of the word “tranquillity” needs to be reassessed by the Council.** The current interpretation is far too tightly constrained.

Again, in our comments on the draft Local Green Space Methodology we made the following points – requesting a broader interpretation of tranquillity:

“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.”

There are very few locations in Bedford Borough which are in the happy position of experiencing “no noise, disturbance by traffic or visual evidence of human influences.....” and yet there are very many places right across the Borough in both urban and rural areas, even in the centre of Bedford e.g. Bedford Park or the Embankment, where many people experience tranquillity.

10.4 CPRE Bedfordshire suggests that **the interpretation of the word “tranquillity” used by BBC in the site assessments of Local Green Spaces needs to be broadened** to reflect the real world and the real perceptions of local people. The judgement and views of local people should, in our view, be paramount in the decision making process.

11) Do you have any comments on any of the updated or new evidence base? (Please write in)

11.1 CPRE Bedfordshire would like to comment on the following background papers:

A). Bedford Strategic Housing Market Assessment (SHMA) update 2016

B). Landscape Sensitivity Study (LSS) Group1 and 2 Villages April 2017

C). Renewable Energy Resource Topic Paper April 2017

11.2 Bedford Strategic Housing Market Assessment (SHMA) update 2016

CPRE Bedfordshire does not agree with the SHMA estimate that 19,000 new homes are needed over the 20 year Plan period 2015 to 2035.

We estimated that the real housing need is no more than 15,000 new homes – a considerable difference.

In our comments on the Objectively Assessed Need prepared for the Council by ORS as part of the Local Plan 2032 we stated:

“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”

11.2.1 The 2016 SHMA repeats this unjustified increase in population stating that BBC considers the 2011 Census estimate of the population of the Borough to be inaccurate. This they say, is based on inconsistencies between the Census and the Council Tax register.

ORS has therefore increased the population in 2011 by around + 4,000 persons above that determined by the National Census.

By accepting this increase in 2011 they have then had to adjust the earlier population estimates and those for the entire 20 year period 2015 – 2035 by a massive +31,000 people.

CPRE Bedfordshire does not accept this increase in population and the reasons for it.

11.2.2 The Office for National Statistics (ONS) which is responsible for all government statistics has conducted a number of studies to judge the robustness of the census methodology and its accuracy when measuring populations of small, medium sized and large communities.

In all cases it has found that the Census provides a remarkably accurate estimate of population.

In fact, when faced with disparities between the census data and other sources, the ONS defaults to the census in almost all cases.

With regard to differences with the Council Tax register the ONS makes the point that the Council Tax register is not always sensitive enough to accurately reflect demographic changes. Examples could be due to migrant populations or student accommodation to name just 2 etc. etc.

It is very much in BBC’s interest to argue for a higher population than that reflected by the 2011 Census as it effects payments coming from central government to the Local Authority e.g. the Barnett Formula for Education payments.

It is interesting to note that the highly respected **East of England Forecasting Model** is happy to use the official 2011 Census population data for Bedford Borough in their demographic statistics.

11.2.3 Already Identified Housing Numbers (9,668)

CPRE Bedfordshire has asked BBC for a definitive list of the housing sites used to establish the “Already Identified Housing Numbers” mentioned in the Local Plan 2035 Consultation Paper 2017 but without success.

However, the latest “5 Year Supply of Deliverable Housing Sites” (February 2017) for the period 2016/17 to 2020/21, shows that BBC expects that 6,145 new homes will be completed over this 5 year period.

This means that only 3,523 new homes will have to be delivered from 2021 to meet the 9,668 already identified in the Local Plan 2035.

The “Already Identified Housing Numbers” included in the Local Plan 2035 is therefore considerably understated and it is very likely that far more homes will be completed.

We estimate this understatement to be of the order of a minimum of 1,000 homes.

This being the case then the total number of new homes to be built will also be reduced by 1,000 units.

11.2.4 41% of 19,000 new houses for people moving into the Borough from elsewhere in the UK

The SHMA calculation of 19,000 new houses is based on their estimate that a massive 41% (7,800) are for people that will migrate into the Borough from elsewhere in the UK.

We cannot find any justification for this extraordinarily high level of immigration anywhere in the Assessment or in Local Plan background papers other than the misplaced belief that it will generate economic growth.

CPRE Bedfordshire believes that it is completely unsustainable to encourage this level population growth in an area of the south east which already has serious problems with increasing house prices, high population density, saturated principal and rural road networks and rail infrastructure at peak times, water supply issues etc. etc. It is far better to plan for an industrial strategy which aims to spread housing growth more equitably throughout the UK.

The proposed housing numbers are far in excess of Local Need which is around 11,000 new homes.

CPRE Bedfordshire recognises 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.

11.2.5 Employment Trends pages 100- 102

Generating unsustainable levels of outward commuting from Bedford Borough

This section of the SHMA states that 19,000 houses will generate in excess of 11,400 workers - para 5.43.

However, the paper notes that the highly respected **East of England Forecasting Model** produced by Cambridge Econometrics estimates that only 6,700 jobs will be created in the Borough.

This number of jobs will require only 5,500 workers due to “double jobbing”.

Therefore the 19,000 new houses 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.

As the draft Local Plan comments in the sustainability background papers, commuting is the least sustainable of all options in terms of planned housing growth.

11.2.6 CPRE Bedfordshire’s calculations show that if the 2011 Census population data is used together with a realistic assessment of “Already Identified Housing numbers” then the total number of new homes needed in the Borough is around 15,000.

This will be more than sufficient to provide housing for “Local Need” and allow for a far more sustainable level of inward migration.

11.3 Landscape Sensitivity Study (LSS) Group 1 & Group 2 Villages April 2017

11.3.1 CPRE Bedfordshire welcomes the inclusion of the Landscape Character Assessment into the process for determining the location of development in the Borough – it is something we asked the Council to consider in our response to the Local Plan 2032 consultation.

11.3.2 The LSS is however a new way (to the Borough) of defining important areas of countryside, views, landscapes etc. that the community wishes to see protected from development.

It is a hugely important document for the protection of the rural environment and it is unfortunate that the document was not circulated for local consultation well in advance of the draft Local Plan 2035 so that it could be better understood.

The Council has included around 20 documents with the Local Plan 2035 consultation and for the majority of Parish Councils and residents this is a considerable amount of information to understand and comment upon.

11.3.3 Lack of clarity in the LSS

The NPPF para 157 says that LA's should, as part of the Local Plan process, "...identify land where development would be inappropriate for instance because of its environmental or historic significance....."

CPRE Bedfordshire's concern with the LSS is that it lacks clarity in terms of what will be protected from development and what will not be protected.

11.3.4 Taking the River Great Ouse valley and associated landscapes as an example

Currently the area has no specific designation - the previous widely used "Area of Great Landscape Value (AGLV)" designation having been removed following government advice some time ago.

The lack of a specific designation for this hugely important feature of the North Bedfordshire countryside is very worrying when development pressures on the countryside are so intense.

The AGLV designation had the effect of restricting development along the River Great Ouse Valley and the wider important landscapes associated with it for reasons of landscape value, biodiversity, tranquillity etc.

We understand that other LA's have sought ways to replace AGLV's by either extending nearby AONB's – not an option in this case - or by utilising the Landscape Character Assessment in some way which is what BBC are doing here.

However, the LSS does not, in our view, provide the level of clarity which would allow people to see precisely which landscapes and areas of the River Great Ouse and valley should be protected from development.

The inclusion of Borough level map/maps which would quite specifically identify areas where development would be inappropriate would be a useful addition to the LSS.

11.3.5 At a local Neighbourhood Plan level we also have concerns.

Some Neighbourhood Plan Groups have developed Parish based Landscape Character Assessments and from that determined policies for where development should take place and where not – how would these now align with those undertaken by the Borough in the "Landscape Sensitivity Study"?

We think that more time is required for local communities to understand and comment on what is being proposed in the LSS and what level of protection will be given to specific areas.

11.3.6 There is also the question of the “weight” given to the LSS when making decisions regarding site selection.

As an example – we are very concerned about site No 620 at Sharnbrook – in our view and that of many in the local community, this site should not have been proposed as a potential site for development – long views across to the Great Ouse River and valley from Sharnbrook – long views from the River itself/Pinchmill lakes to Sharnbrook – close proximity of SSSI Felmersham Gravel Pits etc. etc. – this is a very sensitive site. The landscape and views are recognised as such in the new LSS.

It seems from notes on the site assessment included in the Local Plan that these issues were all pointed out during the decision making process and yet despite this, and comments regarding the importance of the **“views from south facing slopes west of Sharnbrook” made in the LSS**, it has been accepted as a possible site for substantial development.

We find this very difficult to understand and therefore wonder at the purpose and effectiveness of the LSS as it is proposed?

It appears to us that the LSS is an unfinished document – more is required in order to clarify areas of land unsuitable for development as required by the NPPF para 157.

CPRE Bedfordshire believes that the highest level of weight should be accorded to the LSS in terms of development decisions and that this needs to be clarified in the site selection methodology.

11.3.7 More time is required for Parish Councils to fully understand the new LSS

We strongly suggest that local PC's need far more time to understand the LSS and how it will be used – how it relates to their village/community - are there any specific policies that are going to flow from it – if so what are they etc. etc.?

How will locally important areas, landscapes etc. be protected with this new document?

11.3.8 The Parish level maps included in the LSS do not provide a clear indication of the local areas that will be protected from development and this adds to the confusion

11.4 Renewable Energy Resource Topic Paper April 2017

11.4.1 Full and detailed Agricultural Land Classification – Large Scale Solar Energy.

CPRE Bedfordshire is very concerned that in Section 4 of the report “Preferred Methodology” for establishing preferred areas for “Large Scale Solar Energy” there is no mention of the fact that for individual sites a full and detailed Agricultural Land Classification (ALC) Study of each potential site will need to be undertaken.

This is in order that the land can be properly classified and the difference between Grades 3a and 3b land can be established as required by Government and as recommended by Natural England Technical Information Note TIN 049.

This states that the broad information available on the government “Magic” website regarding ALC will be insufficient when determining ALC for particular sites.

11.4.2 Large Scale Solar Energy – Brownfield (previously developed land) first policy

No mention in section 4 “Preferred Methodology” generally or 4.6 specifically, of the Brownfield first policy which is recommended by government and which would override the “identified broad locations suitable for large scale solar energy development”.

11.4.3 Preference for the location of Large-Scale Solar Energy generation on the roofs of commercial buildings e.g. warehouses

CPRE Bedfordshire is very disappointed that the Council does not specifically encourage large scale solar energy generation on the roofs of commercial buildings like warehouses in line with government policy. This could be done by stating that when planning new developments on industrial sites, preference will be given to new buildings of this type (large warehouses), when fitted with solar energy generation facilities.

Encouraging this sort of development would reduce the need for the use of limited agricultural land for large scale solar energy facilities.

11.4.4 Map 4 does not identify land already identified as Grade 3a

CPRE Bedfordshire notes that Map 4, page 26 has not identified “**land off Dungee Road, Harrold – site 554**” as land which has previously been classified as Grade 3a agricultural land.

The land was established as such by the applicants ALC report presented as part of a recent planning application for the site.

We note that Site 554 has been put forward as a potential site for development despite being on land previously classified as Grade 3a and having previously been refused permission for development as a solar farm.

11.4.5 Map4 does not identify potential brownfield sites

12) Specifically in relation to the new settlement proposals, do you have any comments on our initial appraisal of the sites that have been put forward, set out in the study “New Settlements Assessment Framework Methodology and Initial Site Assessment”? Having read the initial appraisal do you have a preference for which settlement(s) the Council should investigate further with a view to allocation? (Please write in)

12.1 CPRE Bedfordshire does not agree with either the scale or location of the proposed “New Settlements” or indeed the need for them.

12.2 Detailed Analysis & Impact Assessment on the surrounding rural area of car and HGV traffic

We are very surprised that for settlements of this size there has been no attempt to complete, at least in outline, a detailed analysis and impact assessment of the traffic flows (both car and HGV) that will be generated on both the immediate and the wider, surrounding rural and urban areas.

The traffic impacts of new settlements on the scale proposed will be enormous and they will have a very seriously detrimental impact on all communities both rural and urban right across Bedford Borough and farther afield into surrounding Local Authorities.

12.3 Analysis of the environmental impact

Any analysis of the environmental impact of the new settlements contained in the “New Settlements Assessment Framework Methodology” appears to have been limited to the immediate location of the New Settlements themselves rather than the wider impact across some very sensitive landscape areas rich in biodiversity such as the River Great Ouse, the river valley area and the “Wolds” areas.

No decisions should be made on this basis.

12.4 Analysis of the water situation

The impact of these new settlements on the water supply position in what is one of the driest parts for the country needs to be established.

12.5 Full and Comprehensive Environmental Impact Assessment

It is essential that full, detailed and comprehensive Environmental Impact Assessments should be undertaken before any decisions are made with regard to developing new settlements in Bedford Borough. Together with a long term demographic study to determine long term housing need beyond the 2035 time frame

12.6 Sustainability of the proposed New Settlements - CPRE Bedfordshire’s view

Building new towns in the middle of the rural 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.

C) 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. The countryside itself and the rural environment will be substantially degraded and biodiversity adversely affected.

12.7 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 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.