

24th July 2017

CPRE Bedfordshire's initial comments on Central Bedfordshire Council's Draft Local Plan 2015 – 2035, July 2017

INTRODUCTION

This document is a summary of our initial thoughts of Central Bedfordshire Council's (CBC's) draft Local Plan 2015-2035. It is intended for both CPRE members and non-members, including parish and town councils, some of whom have contacted us asking for our thoughts. CPRE Bedfordshire's detailed and comprehensive final response to the consultation will be submitted to CBC prior to the consultation deadline on the 29th August.

1. CPRE Bedfordshire has major concerns that a number of the proposals made in this Plan are unjustified, contrary to national planning policy and may ultimately weaken the Plan when it is finally submitted to a Planning Inspector. We call on Central Bedfordshire Council to look again at the Plan it is putting forward to make it work better and more fairly for the people, economy and environment of Central Bedfordshire.

1.1 It is imperative that Central Bedfordshire Council is able to deliver a sound Local Plan, to plan effectively for the future and protect communities from the speculative and unwanted planning developments that many residents have been subject to in recent years.

1.2 Central Bedfordshire Council was due to publish its draft Local Plan for consultation at the end of December 2016. However, this was delayed as CBC felt that it needed to take account of the government's new Housing White Paper. Publication was then further delayed as the General Election was called. The draft was finally submitted for public consultation on 4th July which means that the bulk of the consultation period is being held during the summer holidays – hardly consistent with CBC's stated aim of encouraging local democracy.

HOUSING NUMBERS PROPOSED

2. The overall housing numbers proposed in CBC's draft Local Plan are hugely inflated, unjustified and unsustainable and will lead to an enormous house building programme, which will adversely impact our countryside, infrastructure and communities - more realistic, justified and sustainable housing figures are needed.

2.1 In his introduction to the CBC draft Local Plan Cllr Nigel Young states that CBC are "....planning for a range of between 20,000 – 30,000 new homes over the plan period".

This statement draws a veil over the reality of a massive house building programme which will be hugely damaging to both the rural and urban environments of Central Bedfordshire. **The Council is in fact planning to build double that number of new homes.**

Their **Strategic Housing Market Assessment (SHMA)** (see Technical Reports) calls for a total of some 40,000 new homes (including Luton's unmet need).

This has then been increased by a range of incomprehensible contingencies which bring the number of houses planned to be delivered of between 42,600 and 54,960 (see page 70 of the draft Plan).

CBC estimate that of this huge number, they have already committed to 23,130 houses (i.e. provided with planning permissions etc.) which will be built over the same period.

The majority of the proposed new building will take place on Greenfield sites or on the Green Belt itself.

2.2 Justification

This incredible level of housing development is justified by assuming a level of population growth which we believe is completely inaccurate and relies on huge levels of inward migration from elsewhere in the UK.

2.3 Range of housing numbers

The fact that at this late stage of the development of their draft Local Plan, CBC are proposing such a massive range in the number of homes they are proposing to build – between 42,600 and 54,960 is a 30% variation – does not, in our opinion, reflect well on their Plan making process. Other Local Authorities at the same stage of their Local Plan development would by now be able to provide a detailed breakdown of the number of houses they expect to build.

2.4 Housing Needs of local residents - CPRE Bedfordshire has calculated that around 55% of new homes proposed by CBC are for people they will encourage to migrate into Central Bedfordshire from elsewhere in the UK – **meaning that the needs of local residents can be met with just 45% of the total number of houses planned.**

2.5 To provide some context for this level of house building – the neighbouring local authority, Bedford Borough Council is planning to build 19,000 new homes in total – less than half the number in CBC's draft Plan.

2.6 To put these numbers into some sort of scale, CBC's housing proposals are equivalent to building between 10 and 14 new towns the size of Ampthill (4,000 homes) or between 3 to 4 new towns the size of Dunstable (16,000 homes).

2.7 New towns and urban extensions

The same lack of candour as that used to describe the total number of houses to be built (see 2.1), is also reflected by the use of the word "villages" to describe what are in fact new towns proposed to be built in:

Tempsford (2,500 – 10,000 homes), Marston Vale (5,000 homes + employment land), Aspley Guise Triangle (3,000/3,500 homes). The word village is purposely used to give the impression of much smaller settlements.

The "new villages" to the East of Biggleswade (3,000 – 6,000 homes) is in fact a massive urban extension of Biggleswade itself.

North of Luton on the greenbelt, a new town of 3,500 – 4,000 homes is proposed with 20 hectares of employment land. **To the west of Luton**, also on the greenbelt a new town of 2,000 – 3,000 new homes is planned.

CPRE Bedfordshire is totally opposed to building on the greenbelt except in the most exceptional circumstances.

2.8 CPRE Bedfordshire's estimate of Housing Need

CPRE Bedfordshire is still analysing the Technical Papers supplied by CBC as part of their draft Local Plan 2035.

Our current estimate is that CBC should be planning for around 9,000 homes in addition to the 23,138 already committed to (i.e. already built or planning permissions already given) – a total of 32,138 including Luton's "unmet need".

This is considerably less but far more realistic than the "contingency inflated" additional 43,000 – 55,000 new homes proposed by CBC.

The CPRE Bedfordshire's estimate is more than sufficient to meet the needs of local residents and a more sustainable number of people moving into the area. **It will significantly reduce the need for the new towns and urban extensions proposed by CBC.**

2.9 Employment

The Plan states that a maximum of 30,000 new jobs will be created in Central Bedfordshire over the Plan period (page 2 Draft Local Plan).

CPRE Bedfordshire has calculated that 42,600 new homes will create 51,000 workers and 54,960 homes almost 66,000 new workers. **Incredibly, this means that between +21,000 and +36,000 additional workers will need to commute out of the area to places like London, Milton Keynes, Bedford and Cambridge.** Encouraging this level of "out-commuting" is the least sustainable of all types of development.

3 CPRE Bedfordshire believes that there are other initiatives driving these extraordinary housing numbers.

3.1 Highly inflated and unrealistic housing targets set by government (DCLG) - The majority of Local Authorities have had real problems achieving the high DCLG targets for housing growth, yet CBC has chosen to exceed its DCLG target of 35,000 new homes (which had made it the authority with the third highest rate of housing growth in the country outside London), to an level where its housing growth level over twenty years would be second only to Tower Hamlets in the whole country.

3.2 New Homes Bonus - With huge cuts to central government funding of local authorities, CBC along with other local authorities, is looking to the New Homes Bonus - a payment from central government for each new home completed - to restore its funding position. CPRE Bedfordshire argues that this is no way to plan for sustainable future development in Central Bedfordshire. CBC is already one of the largest recipients of New Homes Bonus in the country.

3.3 The Oxford - Cambridge growth corridor - Without the knowledge or agreement of the residents of Central Bedfordshire, CBC has supported, as part of a submission to the Government's National Infrastructure Commission (NIC), a proposal for the development of 1 million new homes and a population increase of 1.6 million people across "Britain's Silicon Valley". This population increase is dependent on encouraging people to migrate into Central Bedfordshire from elsewhere in the UK.

Full details of this can be found on the home page of CPRE Bedfordshire website: cprebeds.org.uk

GREEN BELT LAND

- 4 Central Bedfordshire Council plans to remove significant areas of land from the Green Belt, without any justifiable “exceptional” circumstances and despite the vast majority of Central Bedfordshire’s Green Belt being judged by the Council’s own study as performing its function well. Once these areas are removed they will be lost to housing development.**

4.1 The Government says that it remains committed to protecting land within the Green Belt and development on Green Belt land is only permitted in exceptional circumstances (confirmed in the recent Housing White Paper). Housing need in isolation is not considered an “exceptional” circumstance. However the Local Plan process allows Local Authorities to change their Green Belt boundaries and in certain circumstances justify removing land from this designation and also add additional land to the Green Belt.

4.2 CBC are considering removing large areas of land from the Green Belt to meet their forecasts for future housing need and because they have agreed to meet part of the housing needs of Luton Borough (7,400 homes). They have no proposals to include additional areas of land within the Green Belt to replace this.

- 4.3 An independent review of Green Belt land in Central Bedfordshire, commissioned by CBC (see the Local Plan Technical Papers), reports that the vast majority of this land is still performing the functions it was designated to do.**

4.3.1 The study did identify a number of small pockets of Green Belt which were judged to be making a weak or relatively weak contribution to all Green Belt purposes. These all lie adjacent to the existing urban edges of settlements and total around 192 ha (around 0.7% of the existing Green Belt). Many of them are not however development sites –as they included 6 schools (totalling around 38ha) already developed land, a football club, woodland and recreation space.

4.3.2 The study clearly stated that it was not prepared as a means of identifying sites for development but was to be used as part of the justification for site selection. It also stated that just because a site is classified as performing weakly, this is not on its own justification to remove it from the Green Belt.

- 4.4 Despite this, CBC has shortlisted over 30 Green Belt sites which are being considered for future housing development and therefore removal from the Green Belt.**

4.5 It is not clear how much land this involves as the draft Plan specifies that only parts of certain sites are being considered without indicating how much, but it could be in the region of over 900ha (3.5 square miles). In addition to this a number of Green Belt sites have been proposed for employment use. CBC still need to make decisions on whether to progress these.

4.5.1 The areas with large areas of land (over 50 ha) identified for development are in the Parishes of Barton le Clay, Caddington, Harlington, Sundon and Toddington.

4.5.2 The plans for the urban extension to the North of Luton and the area around Sundon Quarry (SSSI) as well as the proposed A6-M1 Link have been reproduced in the new Plan.

4.5.3 Further land is proposed, entirely in the Green Belt, for approximately 2000 houses in what is being called Area A: this interacts with the proposed Transport Growth Corridor between Luton and Flitwick and includes Toddington, Harlington, Westoning and Flitwick.

4.5.4 There is more Green Belt land under consideration for development in Hockliffe, Leighton Linlade, Slip End and Dunstable. It is clear that where these proposed sites correlate with the broad areas of proposed development that there is an increased likelihood that they will be included in the final Plan.

- 4.6 Some of the proposals put forward within CBC's withdrawn 2014 Development Strategy and within Green Belt, have simply already been built or are underway. Permissions were granted directly by the Secretary of State for Houghton Regis North1 & 2 and the urban extension of Leighton Buzzard – totalling a number of 9000 houses. Both the Woodside Link and the A5-M1 Link have now been built. All of this development has been in Green Belt, without having undergone a formal review process.
- 4.7 We are concerned that highly-performing Green Belt land carried forward for assessment as potential development undermines the whole purpose of Green Belt and the soundness of the Local Plan.**
- 4.8 CPRE Bedfordshire is firmly opposed to building on the Green Belt except (as the government has stated) in the most exceptional circumstances. CBC has not proved a case for its proposals which represent a massive assault on Bedfordshire's Green Belt.**

ENVIRONMENTAL IMPACTS

- 5 Areas of Outstanding Natural Beauty (AONB)/ Sites of Special Scientific Interest (SSSI).**
CBC has enabled potential development sites to progress through to their first stage of assessment when up to 50% of the site is covered by a national designation – including AONB and SSSI –undermining the protected status of this land and potentially putting at risk some of these beautiful and unique areas of Central Bedfordshire. **CPRE Bedfordshire is strongly opposed to these plans.**
- 5.1 A6 – M1 Link**
The recent Housing White Paper seeks to strengthen the protections offered to AONB and to now include similar protection to Ancient Woodland. However, the draft Local Plan shows the proposed route of the A6-M1 link road would cut across the Chiltern Hill's AONB at Sundon Hills and run along the very edge, if not into the ancient woodland of George Wood. The A6-M1 link is said to be essential to its plans for an urban extension into Green Belt north of Luton. This resulting urban extension infill up to the A6 – M1 link road would surround the Sundon Wood ancient woodland, significantly degrading this area as a wildlife habitat. **CPRE Bedfordshire totally rejects the proposed route of this new road which appears to have been chosen simply to enable the release of more land for housing.**

INFRASTRUCTURE

- 6 Water supply**
The Environment Agency has classified the Anglian Water and Affinity Water supply regions, which includes Central Bedfordshire, as already in "serious water stress". Planning for this level of housing growth in an area of severe drinking water supply issues is in our view, the height of irresponsibility.
- 7 Transport infrastructure**
CBC's own technical documents suggest that the transport infrastructure, both now and with any planned enhancements, will not be capable of sustaining the additional traffic likely to be generated by the level of new housing that is proposed in the plan. **CBC's plan for around 50,000 new homes will generate a minimum of around +75,000 additional cars in Central Bedfordshire – this excludes any additional cars due to the development plans of adjoining LAs. Substantial additional HGV movements will also be generated by CBC's Local Plan.**

7.1 The wider impact of the East-West railway is not addressed in any detail in the plan other than highlighting the opportunities for creating new housing in the vicinity of the planned stations. Likewise the impact of the proposed Oxford-Cambridge Expressway on the connecting highway infrastructure.

CONCLUSION

8 CPRE Bedfordshire fully recognises the need for more housing but the scale of development being proposed by CBC is completely unjustified and unsustainable and fails to take into account the impacts of the neighbouring Authorities' Local Plans. The cumulative impact of this level of new housing will be hugely damaging to our environment, water and transport infrastructure, and ultimately the quality of life of Central Bedfordshire's residents.

8.1 We call on Central Bedfordshire to look again at the housing numbers it proposes in its draft Local Plan, and for others to join with CPRE Bedfordshire in challenging the scale of development proposed.

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.

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 CBC reducing the number of new homes in their Local Plan 2035 to more realistic and sustainable levels.