

**CPRE Bedfordshire's response to Central Bedfordshire Council's
Draft Local Plan 2035 Consultation**

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Sent to Central Bedfordshire Council by email 25 August 2017**

1 Introduction

The following is CPRE Bedfordshire's response to Central Bedfordshire Council's (CBC's) Draft Local Plan 2035 Consultation. As suggested by CBC Planning Policy Department we have consolidated our comments in one document.

The first section deals with overarching comments relating to the process and the Local Plan as a whole. The following sections headed "Key Issues", relate to specific policies within the plan and the technical documents which have informed them.

CPRE supports a plan led system and Local Plans which provide a clear framework for sustainable housing growth and employment whilst at the same time protecting and enhancing our countryside.

Good land-use planning is the unsung hero of environmental protection. It can help slow the growth in road traffic, encourage urban regeneration, curb urban sprawl, protect the beauty and tranquillity of the countryside, and safeguard wildlife habitats.

We believe in the benefits of the Green Belt and the intrinsic value of the countryside.

Central Bedfordshire has some beautiful countryside including the northern edge of the London Metropolitan Green Belt, The Chilterns AONB and the Greensand Ridge. It is our countryside and the "Quality of Life" enabled by it that attracts businesses and people to Central Bedfordshire and Bedfordshire as a whole.

Poorly planned and excessive development can rapidly destroy the very things that make Central Bedfordshire such a great place to live, work and do businesses.

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

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.

2 General Issues

2.1 The Consultation Process - a growing democratic deficit

CPRE Bedfordshire has very serious concerns regarding the consultation process undertaken by CBC. We have written to James Jamieson, Leader of the Council outlining our particular concerns regarding the timing of this very important consultation over the main holiday period.

Many residents and Town & Parish Councils take their vacations at this time and a large number of Town and Parish Councils have no meetings during August. The Council's Planning Policy Officers are also presumably on holiday.

The Council has organised an extremely limited number of "drop-in" presentations at locations across Central Bedfordshire.

There is a large and growing "democratic deficit" with many residents totally unaware of the Local Plan Consultation process.

Many communities no longer receive local newspapers from which, in the past, they would have been advised of the Local Plan Consultation, the proposals and how they could become involved.

Even where local newspapers are available, the information they have presented regarding the consultation is limited.

Local Radio and TV has not found it necessary to encourage debate on the issues surrounding the Local Plan or to inform residents of the process.

Relatively few people visit the CBC website and so an almost exclusively web based communication process is very ineffective.

The **Aarhus Convention**, ratified by the UK Government, establishes the right of access to information, public participation and access to justice in environmental matters including planning.

It is extremely important that CBC residents are aware of and can participate easily in, this important consultation.

CBC has much to do to reverse the growing democratic deficit described above.

Page 34, para 3.2.3 of the draft Local Plan states that 785 stakeholders responded to the first Local Plan Consultation (13 Sept - 1 Nov 2016).

This represents just 0.5% of the working age population (172,000 source EEFM) - hardly a successful engagement with CBC residents.

2.2 The Consultation process - Understatement of housing numbers

Throughout the **Local Plan 2035 "Shaping where you live 2035"** document, the text continually refers to 20,000 - 30,000 new homes as the number to be built over the Plan period.

Examples include: **Page 1, "Forward" final para - "... at this stage we need to be flexible and therefore are planning for a range of 20,000 - 30,000 new homes".**

Page 61 "Spatial Strategy Approach" bullet point 2, "This plan seeks to deliver between 20,000 and 30,000 new homes".

This is extremely misleading and seeks to underplay the reality of the situation which is that the Council is in fact planning to deliver between 42,600 and 54,960 new homes over the Plan period 2015 - 2035 (See page 70 of the Local Plan).

2.3 Plan Formulation - A “top - down” process

CBC is in the fortunate position that their timetable for the Local Plan 2035 has coincided with the fact that a significant number of communities are also developing or considering developing, their Neighbourhood Plans at the same time.

There are currently 26 Registered Areas for Neighbourhood Plans which are at different stages in the process.

It is very unfortunate therefore, that the “Settlement Capacity Study” which underpins key elements of the Draft Local Plan, appears to have been undertaken without asking parish and town councils and particularly those currently undertaking their Neighbourhood Plan, for their views on the housing capacity of their communities.

It is particularly the case for those settlements “inset” in the Green Belt. These communities are well aware of the need for new housing. They are also well aware of the local infrastructure and other issues facing their communities.

The Settlement Capacity Study, which has been undertaken by remote consultants with little empathy for the area, seems to us to be in the process of developing a very blunt tool for judging the capacity of settlements for new housing. See para 4.1.

A community led approach would have been better

CPRE Bedfordshire urges CBC to consider using a “bottom-up”, community led approach. It would result in communities feeling as though they were part of the Plan making process rather than having new housing development imposed upon them.

We would urge CBC to consult and agree a more detailed and “accessible for all” consultation with Parish and Town Council’s for the next stage of the Local Plan process.

2.4 The Oxford - Cambridge Corridor - secret agreements

The Draft Local Plan 2035 and the accompanying “Technical Papers” continually refer to the “Oxford - Cambridge Corridor” and what CBC see as the benefits accruing from proposals currently being considered by the National Infrastructure Commission (NIC) and Central Government, particularly those relating to a new East-West rail link and the Oxford - Cambridge “Expressway”.

It is clearly one of the key “drivers” behind the draft Plan and the extremely high housing numbers proposed.

We are aware that the Leader of CBC James Jamieson, has signed a document submitted to the NIC as part of the “Oxford - Cambridge” consultation process. This document calls for the development of 1 million new homes (+37% increase) and an increase in population of 1.6 million (+35% increase) across the “Corridor” over the next 35 years.

(For more details see the home page of CPRE Bedfordshire’s website).

Despite its importance, to our knowledge, this submission document has never been debated or voted on at a Full Council Meeting and neither has it ever been shared with the residents of Central Bedfordshire.

CPRE Bedfordshire calls on Central Bedfordshire Council to rectify this situation at the earliest opportunity by acting as follows:

- i) The document submitted to the NIC consultation should be made available on the CBC website with immediate effect so that all residents can read what CBC has agreed on their behalf.
- ii) CBC should present the submission document to a meeting of the Full Council for debate.
- iii) As part of the Local Plan process, CBC should advise precisely what commitments they have already given with regard to their share of the 1million new homes committed to by the Leader of CBC.
Furthermore, what actions have CBC already agreed to take to ensure their share of the increase of 1.6 million in the population across the “Corridor”.

CPRE nationally supports strategic planning which can deliver regeneration, development and new infrastructure, especially in deprived areas, but there is a real danger here of swamping the already over-heated south-east and east of England.

We support the early prioritisation and completion of East-West Rail.

The view of CPRE Nationally and of the CPRE branches across the area affected by the “Oxford - Cambridge Corridor” development proposals is that it makes no sense to encourage this extreme level of development and population growth in an area where house prices are already high for local people, which suffers from severe road and rail congestion, relatively high population density, extremely serious water supply issues and very high levels of air pollution.

This is without mentioning the issues currently being experienced in the area due to so-called “soft infrastructure” problems e.g. schools and the availability of teachers, hospitals and local health centres and the availability of doctors and nurses etc.

CPRE believes that a more sensible way forward is a national industrial and development strategy which encourages a more equitable spread of development and population growth across the country.

It should prioritise areas that are most in need of job creation, not contribute to the overdevelopment of the South East.

CPRE believes that the key limiting factor to economic growth in this area is the so-called first/last mile connectivity (into the principal cities and towns) and not a lack of regional “port-to-port” road freight and private passenger transport capacity that would be created by an “Expressway”.

Where enhancements to current transport infrastructure are implemented they should focus on providing integrated public transport solutions, including first/last mile connectivity, rather than inter settlement travel by private vehicles.

2.5 Duty to Cooperate - the London problem

The National Planning policy Framework (NPPF) calls upon LA’s to discuss common issues/problems such as housing and transport with surrounding LA’s, this is called the “Duty to Cooperate”.

One of the largest “impactors” on Central Bedfordshire’s housing stock is London and the GLA.

CPRE Bedfordshire believes that the “Duty to Cooperate” implies a 2-way conversation.

It is now time that CBC called on London and the GLA to start building houses that are affordable for its own citizens.

By not doing so they are effectively ejecting the people of our capital city out into Bedfordshire and other surrounding LA's to seek affordable housing and then to commute back for work - a hugely inefficient and unsustainable process.

This is unacceptable when Bedfordshire's green spaces are being concreted over - it is unsustainable and unfair to the people of Central Bedfordshire damaging their quality of life.

The draft Local Plan states that Central Bedfordshire has a limited number of brownfield sites **but CPRE has shown that there are sufficient brownfield sites in London to build 146,000 new homes - London should take the opportunity to build them for their own citizens and take the pressure off Bedfordshire's countryside.**

3 Key Issue 1 - Housing numbers

CBC has estimated (see Local Plan page 70, para 7.11) that **between +42,600 and +54,960 new homes need to be built in Central Bedfordshire over the 20 year Plan period until 2035.**

This includes a figure of 23,138 new homes that CBC have already provided with planning permissions etc. and which they believe will be completed during the Plan period.

CPRE Bedfordshire totally rejects these massive estimates which have been generated by the addition of huge contingencies (up to +29%). They are not supported by any credible evidence.

These housing numbers are equivalent to building up to 14 new towns the size of Ampthill (4,000 homes).

Whereas most LA's have struggled to meet DCLG housing targets CBC has, by the addition of massive and unexplained "contingencies", managed to exceed them by up to 12,000 new homes or +31%.

This proposal could make CBC second only to Tower Hamlets in the whole country in terms of housing growth.

3.1 Strategic Housing Market Assessment (SHMA)

The SHMA prepared for CBC indicates that 32,000 new homes need to be built over the Plan period to 2035 - see SHMA page 85, Figure 66, Full Objectively Assessed Need (OAN) for Housing.

CPRE Bedfordshire has established from a Freedom of Information request that 60% of the 32,000 new homes are for people migrating into Central Bedfordshire from elsewhere.

The housing numbers have been calculated by assuming, amongst other things, the continuation of the very high levels of national and international immigration into Central Bedfordshire that has been experienced over recent years.

In our view this does not withstand detailed scrutiny.

3.1.1 Basis of Calculation

Whilst CPRE Bedfordshire agrees to the starting point population in 2015 of around 270,000 people we believe that population growth up to 2035 will be substantially lower than that predicted by CBC's consultants, ORS.

CPRE Bedfordshire's estimate of population in 2035 is around 316,000.

This represents a -15% reduction compared to the ORS calculation.

In addition, CPRE Bedfordshire does not accept the +10% increase that ORS has added to the final housing numbers due to "Market Signals" - SHMA page 85 para 4.85 and Figure 66.

The evidence to support this increase is very weak, particularly when it is recognised that the number of new workers that are predicted due to the increased housing numbers will far exceed the number of jobs created - see our comments para 6.

When these issues are taken into account CPRE Bedfordshire estimates that Housing Need in Central Bedfordshire is approximately 24,812 new homes over the Plan period.

This represents a substantial reduction of -22.4% compared to ORS's estimate of 32,000.

3.1.2 Current Housing Commitments

CBC has detailed the number of new homes it has already committed to build over the 2015 - 2035 period and this is calculated as 23,138 homes - see Local Plan page 69 para 7.10 Table 7.1.

Windfalls

As stated in the Local Plan, Para 7.10.2, it would be quite correct to add to this figure of 23,138 a number of "windfall" houses i.e. those that will be built but could not be predicted at the time at which the Local Plan is written.

CPRE Bedfordshire believes that it is very reasonable to add a minimum of a further +2,000 homes to those already committed making a new total of 25,138 homes.

3.2 CPRE Bedfordshire's estimate of Housing Need in Central Bedfordshire

From the comments in paras 3.1.1 and 3.1.2 above CPRE Bedfordshire has calculated that CBC's Housing Need is as follows:

Revised OAN	24,812
Unmet need from Luton	+ 7,400
Total	<u>32,212</u>
Less revised Committed Sites	<u>-25,138</u>

Therefore, the number of new homes required over the period 2015 - 2035 in addition to those already committed = **+7,074**

(This compares to an equivalent number of 16,262 from the Local Plan page 70 Table 7.2 excluding any contingencies).

CPRE Bedfordshire's estimate of the total number of new houses to be delivered in the period 2015/2035 = **32,212**

The CPRE Bedfordshire's estimated OAN of 24,812 more than covers the housing needs of local people together with a more reasonable number of additional homes for those migrating into Central Bedfordshire from elsewhere.

This number of new homes also means that CBC would not need to plan for the large number of new towns proposed and the huge urban extension to Biggleswade.

Furthermore, housing allocations to existing settlements could be kept to more sustainable levels.

Affordable housing - CPRE Bedfordshire supports the SHMA estimate that around 35% of all housing built should be affordable housing. By this we mean housing for social rent and shared ownership.

3.3 Contingencies included in CBC's housing estimates

The use of contingencies in planning is not unusual and, used sparingly, it is considered to make good sense particularly when determining issues over the long term.

However, CPRE Bedfordshire regards the scale of contingencies used by CBC to determine housing delivery to be wholly unacceptable.

The art of "contingency planning" has been taken to a whole new level!

We can find no detailed evidence anywhere, either in the Local Plan, or in the Technical Papers, to support the contingencies which range from +10% on baseline figures to +29%.

Planning on this basis with such a massive range of housing numbers indicates to us the complete lack of a coherent, evidence based rationale which should underpin the development of a well-produced Local Plan.

3.4 Luton's "unmet need"

In our calculations we have included Luton's unmet housing need at 7,400 homes which we understand to be the entire unmet need.

However, we feel that it is entirely unreasonable to expect that Central Bedfordshire meet all of the housing required.

It seems to us that other LA's should also accept a proportion of Luton's housing requirement.

CPRE Bedfordshire believes that a more reasonable level for Central Bedfordshire to accept would be around 5,400 new homes.

Note1: The Inspector examining Luton's Local Plan has released his final report in the last few days (23 August). We have not read the report and so will comment further on this issue when we have had the opportunity to review its contents.

4 Key Issue 2 - Developing Strategy, Growth Option Areas and Housing Allocations

CPRE Bedfordshire has no problem with the rationale that lies behind the general classification of Central Bedfordshire into 4 distinct areas i.e. A, B, C and D.

However, we do have very serious concerns over the scale of the housing development proposed which is to say the least, exaggerated. It takes no account of the resulting quality of life of residents of Central Bedfordshire.

In fact, we found little reference in the entire Local Plan or associated documents to “Quality of Life” – housing growth, it appears, is everything regardless of the consequences.

This draft Local Plan 2035 reflects an attitude to development which is both unreasonable and unsustainable.

The NPPF calls for sustainable economic growth and development not, development at all costs and without careful consideration.

The South East Midlands Local Enterprise Partnership (SEMLEP) has determined that one of the major reasons for businesses moving to Central Bedfordshire was access to the countryside and “Quality of Life”.

The scale of development (43,000 – 55,000 new homes) proposed by this draft Plan risks compromising the very thing that attracts business to the area.

CPRE Bedfordshire therefore calls on CBC to look again at the irrational and unsustainable housing numbers proposed.

The more reasonable housing numbers presented by CPRE Bedfordshire provide for a more balanced approach to Central Bedfordshire’s housing requirement and therefore more sustainable allocations.

4.1 Initial Settlement Capacity Study July 2017

CPRE Bedfordshire is concerned that the above study has been conducted with far too high numbers of homes in each category e.g. “High” (>500 new homes), “Medium” (50-500 homes) and “Low” <50 homes.

This means that there is a lack of finesse possible when judging the capacity of a settlement to accommodate new housing and allocating numbers.

To take the example of Potton and Biggleswade both of which have been classified as having potential to take a “Medium” number of homes.

There is a great deal of difference between 500 homes in Biggleswade (8,500 dwellings) and the same number of homes in Potton where 500 homes would have a very significant impact on a town which currently has 2,300 dwellings.

We therefore suggest that a more refined split is considered, allowing for the size of settlements e.g. < 25, 25-50, 50-100, 100-200, 200-300, 300-500.

Any more than 500 homes should be considered as a specific number of homes for a specific settlement e.g. 620, 1,250, 1,425 etc.

As we have stated in para 2.3 above, The Settlement Capacity Study, seems to us to be in the process of developing a very blunt tool for judging the capacity of settlements for new housing.

In our view, the capacity of settlements for additional housing should be more proportionate to the size of the existing community.

Again, as stated in para 2.3, local communities through their Town and Parish Councils should be involved in the process from the outset.

Infrastructure issues

CPRE Bedfordshire also believes that it is really important when considering potential housing capacity levels for rural settlements that the capacity of the rural road network at peak travel times is also taken into consideration.

It is clearly not acceptable simply to assess the primary road network.

“Soft” infrastructure issues such as healthcare facilities, schools, bus services etc. are also critical when assessing settlement capacities.

The ability to staff these facilities with doctors, nurses, teachers etc. needs to be determined.

We note that this has been recognised in the report page1, para 1.3 and look forward to seeing a more detailed study in the next iteration of the Local Plan.

4.2 Proposed development of new towns and urban extensions at identified “strategic” sites. (Site numbers 1, 2, 3, 4, 5, 6, 7 & 9)

The following sites have been identified in the draft Local Plan to have potential for the large scale development of new towns and large urban extensions:

Location	Number of homes
North of Luton	3,500 - 4,000
West of Luton	2,000 - 3,600
Tempsford South/Airfield	2,500 - 10,000
East of Biggleswade	3,000 - 6,000
East of Arlesey	2,000
Marston Vale	5,000
Aspley Triangle	3,000 - 3,500
South of Wixams	500
TOTAL	<u>21,500 - 34,600</u>

Note: We will comment on the North and West of Luton sites separately in section 5.6.1 relating to development on the Green Belt.

As can be seen from the above table, of the grand total of 43,000 - 55,000 new homes to be built over the Plan period, CBC propose that between 21,500 and 34,600 will be built at these “strategic” locations.

This means that a minimum of a further +22,000 homes would need to be allocated to other parts of Central Bedfordshire.

4.3 Evidence base for new towns and urban extensions

Quite apart from the fact that CPRE Bedfordshire has already demonstrated that the total number of houses proposed by CBC are both unnecessary and hugely inflated (see para 3.2).

CPRE Bedfordshire is very concerned indeed that these strategic locations have been put forward as potential sites for the development of large new towns and urban

extensions without undertaking and publishing detailed assessments of the evidence base for the choice of each location.

For example:

- Where is it assumed that the people living in these new towns will be employed and by what means will they get to their place of employment?
- How was the size of each of the new towns or urban extensions decided?
- Are the locations sustainable for the numbers of homes proposed?
- What “soft” infrastructure will be required, how much will it cost, who will provide it and where will the employees come from to staff them?
- What impact will these new towns and urban extensions have on the rural road network?

4.4 Traffic flow impact evidence - new towns and urban extensions

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 Central Bedfordshire and farther afield into surrounding Local Authorities.

Without this comprehensive evidence base CPRE Bedfordshire rejects out of hand these proposals for new towns and urban extensions.

The need for them has not been demonstrated in any way at all.

It appears to CPRE Bedfordshire that this aspirational and irrational approach to planning without any solid evidence base to support it is the reason why this draft Local Plan completely fails to deliver a coherent sustainable programme for the future development of Central Bedfordshire.

5 Key Issue 3 - Development on the Green Belt

CPRE Bedfordshire understands that the Local Plan process is the appropriate forum for reviewing Green Belt boundaries. However, we will strongly object to any proposals to release land from the Green Belt unless there is proper and sound justification.

At present, the Local Plan documents do not provide evidence for anything but small “tweaks” to existing boundaries.

5.1 Central Bedfordshire & Luton Green Belt Study

As a starting point the Council’s independent Green Belt study concluded:

“The majority of the Green Belt in Central Bedfordshire and Luton continues to serve its purposes very well, safeguarding the identity of South Bedfordshire by

maintaining the openness of the countryside and protecting the dispersed settlement pattern”.

The study also concluded that less than 1% of the total Green Belt land is making only a “weak” or “relatively weak” contribution to all Green Belt purposes. These “weak” parcels are all relatively small and lie adjacent to existing urban edges of inset settlements.

The report noted that:

“the relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt.”

Despite this endorsement of the existing Green Belt, the contents of the Green Belt study have been largely ignored or taken out of context and the only justification for major green belt release is the need to accommodate highly inflated housing number requirements.

It would appear that over 900 ha of green belt land are being considered for housing and over 200 ha for employment.

Planning policy (in particular the National Planning Policy Framework and the recent Housing White Paper) specify that proposals to amend Green Belt boundaries can only be made in “exceptional circumstances” and if the Authority has examined all other reasonable options.

We are not satisfied that these “exceptional circumstances” exist or that all other reasonable options have been examined.

Within the Local Plan it is suggested that the evidence contained in the Growth Options Studies, Urban Capacity Study, the Sustainability Appraisal, the Site Assessment Technical Document and Brownfield register, demonstrates that Green Belt land is required to meet the requirements of the Local Plan.

5.2 Urban capacity Study

The Council’s Urban Capacity Study highlighted that there were other methods of increasing numbers of housing rather than just allocating land within the Green Belt. In particular the Council could:

- 1. Increase development densities on other sites.**
- 2. Reallocate surplus employment sites for residential use.**
The Council’s employment Land review identified 12 sites with planning permission (but not yet developed or completed) which should be critically reviewed by the Council due to the current oversupply of employment land.
- 3. Carry out a Central Bedfordshire wide Urban Capacity Study** - only a more limited study of the Luton, Dunstable and Houghton Regis has been commissioned. This concluded that there may be an opportunity to increase development capacity by 148-496 dwellings within this limited area through increasing density
- 4. Update and publish the Brownfield register for the Borough**

5.3 Sustainability Study

The Council’s Sustainability Appraisal is driven and thus fundamentally flawed, by the need to accommodate the high growth figures and housing numbers.

As stated earlier we believe these figures are way in excess of what CBC should be planning for in the future and therefore what needs to be accommodated within the Local Plan.

This study seeks to justify developing in the Green belt through a list of nebulous, unquantified positives, namely:

1. Growth in this area will offer opportunities associated with new development which Green Belt designation restricts.
2. Appropriately located housing and supporting infrastructure around Houghton Regis and Luton could have major positive effects for these areas with high deprivation
3. Growth in this area will support the provision of housing supply for the Luton HMA.
4. The location of key transport corridors here provides employment benefits for this area.
5. There is good access to open space, recreation and green infrastructure, which would benefit existing and new communities.

The negative effects are noted and also significant but not assessed in any detail:

1. The loss of green belt designations could result in the coalescence of small settlements.
2. Growth along the transport corridors, namely along the M1 corridor around Dunstable and the AQMA, could result in poorer air quality.
3. Potential for negative effects on the predominantly rural landscape. These could be cumulative and residual effects will depend on the scale and scope of the development and how the potential effects are mitigated.
4. Increased development will result in loss of soil resources.

The Council summarise their position in the study by stating:

“Green Belt constraints have previously restricted the opportunities that can be associated with development such as new housing and infrastructure in Area A. This area also includes pockets of higher deprivation, so new growth can have the potential for major positive effects, with the delivery of new infrastructure, facilities and affordable housing”.

This does not present a balanced picture as no analysis has been provided of the detrimental impact on the Green Belt as a whole by removing large tracts of strongly performing land.

5.4 Site Assessment Technical Document

The Site Assessment Technical Document does recognise Green Belt as a technical constraint where additional considerations are applied.

The Council has however automatically passed any sites designated as preforming weakly or relatively weakly within the Green Belt study - despite the Green Belt consultant's caveat that this classification does not count as exceptional circumstances.

Until we see the final site selection we cannot assess how the Council are justifying any selection decision.

No updated Brownfield Register has been produced by the Council and this is essential before any decisions can be taken regarding site selection.

5.5 Green Belt development - Conclusion

In conclusion, CPRE Bedfordshire fails to see how the Council can justify any “exceptional circumstances” for removing land from the Green Belt. Nor can we find in any of the documents any assessment of the cumulative damage large scale removal would have to the effectiveness of the Green belt as a whole.

One of the Council’s key priorities within the Strategic assessment which underpins the Local Plan is *to maintain and enhance community and settlement identities*. This was the very reason the Green Belt was established and should remain as currently designated.

5.5.1 Town expansion Sites 4 & 5 - North of Luton 4,000 homes & West of Luton 2,000 homes - **opposed by CPRE Bedfordshire**

These sites lie entirely in the Green Belt and, in the case of Site 4, also on the edge of the Chilterns AONB.

Both sites are extremely sensitive and important areas of open countryside on the urban fringe. Both incorporate areas of ancient woodland and are havens of biodiversity.

For all the reason detailed in paras 5 to 5.5 above we are opposed to this development.

No “exceptional circumstances” have been identified for this level of development on the Green Belt.

We believe that the amount of Luton’s unmet need that Central Bedfordshire can reasonably be expected to accept should be reduced from the 7,400 currently planned. Before any land in these areas is even considered for housing development, new homes already agreed for Houghton Regis, HR North and Dunstable should be built out.

Every effort should be made to increase housing delivery in the urban areas of Luton, Houghton Regis and Dunstable through urban regeneration.

(Please refer to Note1, para 3.4 above re Luton’s Local Plan).

6 Key Issue 4 - Employment

6.1 Linkage to Housing Numbers

The Council states that it plans to deliver a minimum of 24,000 new jobs over the Plan period. In addition, it expects to be able to deliver around 6,000 additional jobs from the “footloose” strategic warehousing sector.

In total therefore it plans to encourage the delivery of between 24,000 and 30,000 jobs.

CPRE Bedfordshire has calculated that 42,600 new homes will create around 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.

This highlights once again the unsustainability of CBC’s Local Plan and in particular the housing numbers.

6.2 Strategic warehousing sector

CBC has highlighted the warehouse sector as businesses to target for additional employment but there are several disadvantages with this strategy:

- (i) The majority of the jobs created by the sector are often low skilled and low paid.
- (ii) The trend in warehousing is towards ever higher levels of automation with a subsequently reduced need for labour. So, it may be very difficult if not impossible, to achieve the additional 6,000 jobs predicted.
- (iii) Warehousing is an extremely inefficient user of land. Because, in general, they are single storey buildings they take up a considerable amount of land compared to the number of jobs generated.
- (iv) Logistics activity will increase the level of HGV freight movements by road into and out of the sites placing further pressure on the primary road network which is already at or above maximum capacity levels
- (v) Increasing traffic will increase air pollution.

6.3 Employment Site 2 - Sundon RFI and warehousing - **opposed by CPRE Bedfordshire**

For the reasons laid out in paras 6.2 above together with the fact that the site lies entirely within the Green Belt, CPRE Bedfordshire totally opposes the development of the Sundon Rail Freight Interchange (RFI) and the associated warehousing at the Employment Site 2 (J11a of M1) in the Local Plan.

7 Key Issue 5 - Transportation - road and rail

CBC have commissioned analysis of the primary road transport system based upon simulations carried out by a consultancy, AECOM Ltd., using a pre-existing model of the road network in the area (the Central Bedfordshire and Luton Transport Model).

The purpose of the simulations is to identify potential points of stress in the network under various scenarios. The study was confined to road usage and didn't include rail.

Like all simulation studies the outcomes are totally dependent upon the assumptions that are made and which form the basis of the scenarios.

CPRE Bedfordshire's interpretation of these studies is that the road network is already close to capacity at certain points and at peak times and if new homes are built in anything like the numbers being proposed in the Local Plan then the pressure on the road network can only get worse.

The report states (key findings para 3.3) **"All growth options show stress on the road network across Central Bedfordshire"**

Even if the proposed transport infrastructure schemes are delivered, the report suggests that only very limited improvements to traffic flows can be expected.

We understand that Highways England have stated that some parts of the M1 through Bedfordshire are operating well above 100% capacity ratios and they have requested LA's to avoid development in these areas which will lead to increase traffic levels.

7.1 A6 - M1 Link Road - **opposed by CPRE Bedfordshire**

CPRE Bedfordshire is strongly opposed to the development of this road for the following reasons:

- i). The route is too far north, cutting into the Chilterns AONB - it will cause considerable damage to this important landscape and to ancient Woodland.*
- ii). We do not believe that the northern route is required - there are other more sustainable options - upgrading existing roads to the south.*
- iii). There are already serious over capacity issues on the M1*
- iv). Air pollution levels which are already high will be further increased.*
- v). There has been no proper consultation regarding the proposed route*

CPRE has recently released research regarding road-building which shows:

"From examining road-building over the past 20 years, the researchers found clear evidence that new road schemes:

- induce traffic, often far above background trends over the longer term
- lead to permanent and significant environmental and landscape damage
- show little evidence of economic benefit to local economies"

CPRE advocates a different approach to transport policy, shifting away from adding road capacity towards a restructuring of the transport system, by adopting a 'smarter travel' hierarchy.

Further details can be found using the following link:

<http://www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus>

CPRE Bedfordshire estimates that the housing numbers in the Draft Local Plan could lead to an increase of +75,000 additional cars in Central Bedfordshire. From the data provided we are unable to calculate the increase in HGV traffic.

More traffic will be generated by the Local Plans of neighbouring LA's.

We look forward to CBC providing details of the expected increase in HGV traffic over the Plan period.

A very significant part of Central Bedfordshire is rural in nature.

We look forward to an analysis of the rural road network completed in the same way as the AECOM study of the primary road network.

7.2 East - West Rail. Development Gain & Economic Benefit Study

Despite "East - West Rail" featuring very highly in CBC's future housing plans and employment land development, the only study on the "economic" benefit to be derived from this really important sustainable transport infrastructure, is one which focuses primarily on the opportunities for housing development in the vicinity of the proposed new stations.

Whilst it's interesting to note that house prices in the vicinity of the stations will be higher by between +6 % and +20% compared to the surrounding area, the subject requires a wider range of more detailed studies in order that the benefits can be better understood.

East - West rail is one of the most important sustainable transport infrastructure programmes undertaken in Bedfordshire and neighbouring counties for many years. It will have a very profound impact on the area and yet, background information regarding its potential impact is extremely limited.

Conspicuous by its absence is any detailed evidence to support the new towns in Aspley Guise, Marston Vale and Tempsford proposed by CBC in the Draft Local Plan 2035.

If additional studies have been undertaken by other organisations e.g. Network Rail, they should have been made available as part of the Local Plan Consultation process.

We urge CBC to provide more detailed studies in the next iteration of their Local Plan.

8 Key Issue 6 - Environmental and Sustainability Issues

8.1 Development on AONB and SSSI sites - opposed by CPRE Bedfordshire

CBC has enabled potential housing 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 development on these sites and believes that the site selection process that has allowed this to happen needs to be reviewed.

8.2 Air Pollution - lack of study to determine impact of Local Plan proposals

Central Bedfordshire already suffers from excessive levels of Air pollution particularly along the principle transport corridors of the M1 and A1 and within the urban areas in the south of the local authority area.

In view of the high level of importance that the government has given to reducing the levels of air pollution, we are extremely surprised and concerned that CBC has not completed a detailed study to determine the effects that the Draft Local Plan proposals will have on future air quality levels across the entire LA area.

CPRE Bedfordshire is equally concerned that there appears to be a lack of air quality monitoring stations at key locations across Central Bedfordshire in order that a comprehensive picture of air quality can be determined.

We call on CBC to ensure that the number of monitoring stations is sufficient to ensure accurate monitoring of air pollution across Central Bedfordshire.

CPRE Bedfordshire looks forward to the publication of a detailed and comprehensive Air Quality Study as part of the next iteration of the Local Plan 2035 process.

8.3 Water - Water Cycle Study

We note that 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.

We note in section 6.6.4 Conclusions (regarding wastewater discharges):

The report identifies some sewage treatment works that will need to be upgraded to accommodate growth i.e. Barton le Clay, Chalton, Dunstable, Markyate, Shillington and Tempsford.

Depending on the scale of growth, this may have an impact on the timing of any proposed developments while investment in new infrastructure is approved by Offwat and then it is upgraded.

We would expect to see this fully detailed in Stage 2 of this report once sites are known.

In point 2, the report states that remaining WwTW's have some capacity within their existing permits to accommodate future development without causing deterioration in water quality.

However, this spare capacity is based on existing housing numbers which are considerably out of date e.g. Potton has already exceeded the calculated spare capacity by several hundred dwellings.

In neither case has any method for working out any spare capacity been fully explained and is therefore unverifiable.

A concern will be to see that up to date numbers for dwellings is used in Stage 2 of this report and due weight given to housing development plans from other adjacent Local Authorities seeking to discharge to the same water courses, in order to determine cumulative potential environmental impacts.

We await Stage 2 of the Study for a more detailed analysis.

In the meantime we hope that CBC will have already ensured that developers are building new homes in Central Bedfordshire to the highest water efficiency standards which we understand are the **optional New Building Regulation Standard (Approved Document G from the DCLG)**.

CPRE Bedfordshire
25 August 2017