

Introduction - CPRE Bedfordshire's Briefing Document No.1

Development proposals for the Oxford - Milton Keynes - Bedford - Cambridge Arc.

The following Briefing Document is aimed at CPRE Bedfordshire's members, Town & Parish Councils, District Councillors and others in Bedfordshire who have asked for our views on the impact of the National Infrastructure Commission's (NIC) recent report:

"Partnering for Prosperity: A new deal for the Cambridge - Milton Keynes - Oxford Arc"

The full report can be found on the NIC website by using the following link:
<https://www.nic.org.uk/publications/partnering-prosperity-new-deal-cambridge-milton-keynes-oxford-arc/>

The NIC is a non-ministerial government department responsible for providing expert advice to HM Government on infrastructure challenges facing the United Kingdom. The Chair of the NIC is Lord Adonis and many of the members of the Commission are associated with development companies or businesses involved in the financing of development projects.

The report was published in November 2017 in time for the Autumn Budget, following a period of public consultation.

The report calls for +1 million new homes and a population increase of +1.6m people over an Arc only around 80 miles in length.

CPRE nationally responded to the public consultation with a submission which reflected the concerns of CPRE Bedfordshire and other CPRE branches impacted by the proposals. The Government has since given its support to the NIC report despite local people knowing nothing whatsoever about it.

The briefing document which follows is a 12 page precis of the NIC paper which is 91 pages in length.

Our objective has been to analyse the document with Bedfordshire in mind. We have therefore concentrated on the issues in the NIC report which we feel will have the most impact on Bedfordshire.

We hope that this will provide CPRE Bedfordshire members and others with an overview of the principal impacts that the NIC proposals will have on the Bedfordshire countryside and urban green spaces, the Quality of Life of local people and also the adverse implications for our local democracy.

It has been very clear to CPRE Bedfordshire for some considerable time that NIC development proposals for the "Arc" were having a very major impact on the Local Plans being developed by LA's across Bedfordshire - driving massive housing numbers and a very large number of new towns - well in excess of local need.

CPRE's view on the Oxford - Milton Keynes - Bedford - Cambridge Arc:

CPRE nationally supports strategic planning which can deliver regeneration, development and new infrastructure, especially in deprived areas, but there is a real danger 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.

With the massive level of proposed development, the "hard infrastructure" improvements suggested by the NIC will have only a minimal impact on the levels of traffic congestion etc.

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 Bedfordshire December 2017

Note:

- i. **LEP's** - Reference in the briefing paper is made to LEP's - Local Enterprise Partnerships - unelected bodies which are having a major impact on development across Bedfordshire. They are responsible for distributing very large sums of Government and European Union funding.
The LEP which covers Bedfordshire is SEMLEP - South East Midlands LEP.
- ii. **"England's Economic Heartland Strategic Alliance"** - 6 LEP's who come within the Oxford - Milton Keynes - Bedford - Cambridge Arc came together in the last year to form another unelected body called "England's Economic Heartland Strategic Alliance" (EEHSA). The Mayor of Bedford, Dave Hodgson is on the Manage Team of EEHSA and the Leader of Central Bedfordshire Council, James Jamieson is the Vice Chair. It was EEHSA that proposed, in September 2016, to the NIC consultation that 1 million new homes should be built across the Arc and that the population should increase by +1.6m by encouraging people to migrate into the area from elsewhere in the UK.

CPRE Bedfordshire's Briefing Document No 1 - precis of the:

National Infrastructure Commission report - "Partnering for Prosperity: A new deal for the Cambridge-Milton Keynes-Oxford Arc"

Note:

- We have taken extracts from the NIC report in order to compile this precis.
- Page numbers indicated are pdf not report page numbers
- Text in bold black font type are our highlights
- CPRE Bedfordshire comments are in red.

P2 Foreword

create places in which people want, and **can afford**, to live and work.

The proposed East West Rail and Expressway schemes must be built as quickly as possible to unlock land for new homes and provide a better service for those who already live across the arc.

(CPRE Comment- EWR is about releasing land for housing not the environment)

Our place making competition has demonstrated that there is an abundance of creative, **industry-led** ideas for how the arc can accommodate transformational housing and employment growth in a way that enhances quality of life while respecting the environment and interests of existing residents.

(CPRE Bedfordshire comment – industry led not people-led or democratic - no evidence of environmental respect.)

P3

East West Rail and the Oxford-Cambridge Expressway provide a once-in-a-generation opportunity to unlock land for new settlements

(CPRE Bedfordshire comment – this new hard infrastructure is all about unlocking development land not about improving transport in the area for ordinary people. The new roads will become super congested within very few years with the level of development proposed – even with East – West rail.)

P4

Northampton is an integral part of the Arc

P8

If the arc is to maximise its economic potential, current rates of house building will need to double – **delivering up to one million new homes by 2050**. ... respect and enhance the natural environment and the quality of life enjoyed by existing residents.

(CPRE comment - 1 million homes = equivalent to building 20 new cities the size of Cambridge (50,000 homes) - nothing about democratic choice – nothing on how the quality of life of existing residents will be improved)

It is unlikely that this level or quality of development can be delivered if growth is focused exclusively on the fringes of existing towns and cities, or through the development of small garden towns and villages. Government and local authorities will need to plan for, and

work with investors, developers and housebuilders to deliver, large new settlements and major urban extensions – including the first new towns in over a generation.

(CPRE Bedfordshire comment – this is why we are seeing proposals for massive new towns and urban extensions in Local Plans of Bedfordshire's LA's. The Housing needs of local people can be met with around 40% of currently proposed housing numbers in Local Plans)

They will also provide a vital step in the development of a strategic transport corridor connecting East Anglia to the west of England and south Wales

(CPRE Bedfordshire – the objective is an outer M25 eating up even more of our countryside with massive urbanisation of our countryside)

P9

Maximising the potential of these schemes to support well-connected and well-designed new communities will mean:

progressing the East West Rail project as an inter-urban commuter railway – **limiting the number of stations** in order to safeguard commuting times, and focusing larger scale development around a smaller number of transport hubs and interchanges;

developing the Oxford-Cambridge Expressway, along the same broad corridor as East West Rail – creating a multi-modal transport spine that can support the development of large scale new communities; and

delivering these projects as part of a single, integrated programme focused on identifying and exploiting major development opportunities, from **smaller scale garden towns of around 10,000 homes through to new city-scale developments of up to 150,000 homes**. Any such programme should consider opportunities that may exist to:

- . enable new settlements and major urban extensions – for example, between Oxford and Milton Keynes, and **between Bedford and Cambridge** – some of which may have the potential to grow to city-scale; and

- . support the ongoing growth of existing towns and cities – for example, re-establishing Milton Keynes as a growth location of national significance; **unlocking growth in and around Bedford, and focusing development on a small number of key nodes in the Marston Vale**.

(CPRE Bedfordshire comment – decisions already made on size and scale without any consultation with local people)

Recommendation 1a:

Government should progress work on East West Rail, the Expressway and new settlements through a single co-ordinated delivery programme, with cross-government ministerial commitment and oversight. The aim of this programme should be to unlock opportunities for transformational housing growth through the creation of well-connected new communities. As part of this programme Government should commit:

£1bn to deliver the infrastructure necessary for a **high quality and resilient rail commuter service between Bicester and Bedford, accelerating delivery of this section of East West Rail to a target date of 2023;**

to accelerate work on the development of the new East West Rail line between Bedford and Cambridge, and commit to open the line by 2030; and

to deliver the 'missing link' of the Oxford-Cambridge Expressway, accelerating development work to deliver a clearly-defined and agreed route by 2025, enabling construction to begin as part of the next Road Investment Strategy (RIS 2) and be complete by 2030.

(CPRE Bedfordshire comment - i.e. missing link in the outer M25)

P10

Recommendation 1b:

Government should seek to introduce **fast, direct services to London** to enable growth in the arc between Bicester and Bletchley and improve connectivity between London and Aylesbury. Any such improvements should be contingent on local authorities' commitment to major development between Bicester and Bletchley and around existing settlements.

(CPRE Bedfordshire comment - i.e. London commuter belt not local growth)

Neither the location of new settlements, nor the form taken by development corporations should be imposed 'top-down'. Local authorities and national government should work together, through a robust and transparent assessment processes, to identify, assess, consult on and designate locations for new settlements. They should negotiate the objectives, membership and reporting arrangements for new development corporations. The Secretary of State should, however, retain the power to designate new settlements in the national interest where voluntary agreements cannot be reached.

(CPRE Bedfordshire comment – This means cosy secret deals between Government and LA's without consultation with local people. It's happening already through LEP's and "England's Economic Heartland Strategic Alliance" (both unelected) committing to 1 million new homes and a population increase of 1.6m people. See CPRE Bedfordshire website) <http://www.cprebeds.org.uk/news/current-events-2/item/2303-leaders-of-bedfordshire-s-local-authorities-sign-up-to-document-calling-for-one-million-new-homes-across-the-oxford-cambridge-corridor>

P11

Recommendation 2a:

Government and local authorities should work together, through a robust and transparent process, to **designate locations for new and expanded settlements by 2020**. This should involve:

commissioning formal studies to identify and assess options for new settlements required, and potential locations for these settlements;

consultation with communities, statutory agencies, infrastructure providers, wider stakeholders and public examination of proposed sites; and

formal designation of sites and the publication of such assessments as legally required.

The Commission is optimistic that Government and local authorities will reach agreement on the scale and location of new settlements in the national interest. However, if agreement cannot ultimately be reached, the Secretary of State should designate these new settlements.

(CPRE Bedfordshire comments - If all else fails government will impose – so much for “Localism”)

Recommendation 2b: Government should:

work with local authorities to establish appropriate delivery vehicles for new and expanded settlements across the arc, considering the role that can be played by locally accountable Development Corporations, Mayoral Development Corporations, the Homes and Communities Agency and Urban Development Corporations.

establish New Town Development Corporations to deliver larger new and expanded settlements. In so doing, it should: work with local authorities to define and agree the objectives, membership and reporting arrangements for new development corporations;

provide a clear remit to support the economic success of large new settlements as centres of employment, and assist the development corporation by using wider policy levers to support local economic growth; and

explore the full range of options for funding development corporations' programme of land acquisition, including providing public funding with a view to unlocking substantial private investment, and balancing considerations of short-term affordability and long-term value for money.

New development should not be to the detriment of existing communities, nor should it compromise the quality of the arc's natural and built environment. Maximising the arc's potential requires effective place making and robust arrangements for the stewardship of new and expanded settlements.

(CPRE Bedfordshire comment - No mention of participation of local people)

P12

The most powerful mechanisms place responsibility – and resources – with the community itself. Where Government realises surpluses arising from the development of new settlements, a proportion should be retained to establish mechanisms for the ongoing development, stewardship and maintenance of local community assets, without further burden on the general taxpayer.

(CPRE Bedfordshire comment – where have we heard that before from developers?)

Recommendation 3:

Government should work with local authorities to:

put in place an independent design panel for East West Rail, the Expressway and new and expanded settlements across the arc by April 2018. This panel should work in concert with existing infrastructure design panels and new development corporations to specify, scrutinise and challenge settlement designs, plans and delivery, with a view to: making most efficient use of new and existing infrastructure (including transport and utilities); supporting positive social outcomes (including better mental and physical health); achieving net gains in biodiversity and natural capital across the arc; and improving quality of life for existing and future residents.

establish arrangements for the long-term stewardship of valued community assets in each new or expanded settlement, placing responsibility and resources in the hands of the community – learning from both the Parks Trust in Milton Keynes and the Letchworth Garden City Heritage Foundation; and

ensure that strategic infrastructure, including new elements of East West Rail and the Oxford-Cambridge Expressway, are planned and developed to achieve net gains in biodiversity and natural capital across the arc.
(a hint of democracy – we need to get involved in this)

P13

Local authorities should work with LEPs, local business groups, educational institutions and other key partners to formally agree robust and credible transport plans to enable the development of the arc's key towns and cities. These should be agreed locally by April 2019. (only one of these is democratically accountable)

P14

Recommendation 5:

Government should, through bespoke deals with local areas, make changes to the operation and application of CIL and s106 agreements

(CPRE Bedfordshire comment – the NIC is an organisation made up of developers and financial investors and this recommendation proves that they are interested only in the profitability of the developers – CIL funding and S106 agreements are vital to ensure the development of local hard and soft infrastructure e.g. local roads, local schools, community facilities, affordable homes etc. etc. CIL and S106 agreements are paid by developers when they build new houses. This para is all about reducing the amount of money that developers will have to pay to fund these facilities).

Recommendation 6:

government should consider the need for agreements extending flexibilities in the application of five-year land supply requirements. These agreements should only be considered in cases where local authorities agree deals to accommodate significantly higher levels of housing growth. Flexibilities should:

help ensure that local areas are not exposed to increased risk of speculative development as a result of their commitment to additional growth; and

be kept under review and made subject to local areas demonstrating progress in the delivery of major housing growth.

P15/16

Strategic spatial plans should be developed through bottom-up collaboration between local authorities at the 'larger than local' level, joining up economic, infrastructure (including transport and utilities) and land-use planning in defined sub-regions across the arc. These strategic spatial plans should be placed on a statutory footing – ensuring that local plans at the district, borough and city level are developed to support the wider spatial vision. Local authorities and LEPs should work collectively and seek to agree a definition for sub-regional planning areas by April 2018

(CPRE Bedfordshire comment - power will be moved from LAs to a broader regional/sub regional bodies – with a loss of local democratic accountability)

local authorities across the central section of the arc have been working on proposals to develop their own growth board

(CPRE Bedfordshire comment - This is news to us and all residents of Bedfordshire – Have they? Who are these “Growth Boards”? What are they called? Who sits on them? How are

they funded? Are they subject to FOI requests? Are they elected? Would “England's Economic Heartland Strategic Alliance” be one of them?)

P17

Recommendation 8:

Government should work with local authorities to put in place robust sub-regional and arc-wide governance arrangements.

(CPRE Bedfordshire comments - Unelected no doubt? Subject to FOI requests?)

P18

travel to work areas including those centred on Bedford, Luton,

(CPRE Bedfordshire Comments - i.e. Bedfordshire will just be a commuter belt)

p27

15,926 homes (annually) provided for in local plans. 30,000 homes needed to meet local needs & pressures from land constrained markets.

Accommodating between 1.4 and 1.9 million people could require between 782,000 and 1,020,000 new homes by 2050. Current development plans, if realised in full, might be expected to deliver only 230,000 of these new homes. This includes sites that are under construction, approved, in for planning or allocated in local plans.

(CPRE Bedfordshire comments - this is a 50% growth in population. Population now further increased from +1.6m to +1.9m!)

P28

It is unlikely that this level and quality of development can be delivered if new housing is secured exclusively through incremental developments on the fringes of existing towns and cities. It is equally unlikely that this level of growth can be achieved through the development of smaller garden towns and villages. Therefore, if we are to unlock the potential of the CaMkOx arc, Government and local authorities will need to plan for major urban extensions and large new settlements – including the first new towns to be built in over a generation.

(CPRE Bedfordshire comments – so the numbers of homes in Bedfordshire's Local Plans have already been agreed before any consultation with local people! The consultation process is a sham)

P31

By improving these connections, new east-west road and rail connections have the potential to increase the labour market catchment areas for the arc's key towns and cities, opening up new opportunities for collaboration and job growth. But the true value of these schemes rests in their potential to open up new sites for development, improving the supply of accessible, developable land and supporting the delivery of new homes at affordable prices for all workers.

(CPRE Bedfordshire comment - the focus is on feeding high growth cities not spreading employment throughout the corridor – this is unsustainable commuting!)

P32

These schemes, taken together, have the potential to create a multi-modal transport spine, which through new stations and junctions, can enable the creation of new communities. They can also improve access to jobs, services, wider national connections through the existing strategic road and rail networks and could enhance connections with international gateways, such as Heathrow. Each scheme would serve different purposes and markets, delivering benefits that are complementary to one another. It is therefore essential that both East West Rail and the Expressway are delivered as quickly as reasonably possible.

P33

The proposal for phase 2 of East West Rail involves connecting Bicester and Bedford, utilising the existing Marston Vale line between Bletchley and Bedford as part of this scheme. Phase 3 involves a wholly new line between Bedford and Cambridge. The original track bed for phase 2 of East West Rail remains mostly intact, and there appears little benefit in deviating in any major way from this route.

P34

The Oxford-Cambridge Expressway would also be delivered in parts. The eastern section upgrades between the Black Cat roundabout on the A1 and Caxton Gibbet delivered as part of the current Roads Investment Strategy (RIS 1), in effect establishing an Expressway standard route between Cambridge (M11) and Milton Keynes (M1).

P35

Stations across EWR will act as a beacon for development, allowing sites and localities that are currently poorly connected to become viable options for major expansion.

(CPRE Bedfordshire comments - but they have already said there will be few stations)

Such an approach could mean that the Marston Vale benefits from better trains, faster journeys, and access to more locations further afield. In addition, the arc as a whole enjoys better capacity – equating to the potential for greater frequency – on East West Rail services.

P36

Whilst all the options for the western section of the Expressway would provide increased road capacity, aligning the route of the Expressway with East West Rail will unlock the greatest potential for sustainable new places at scale..... Aligning the Expressway and East West Rail on the same broad corridor is also likely to be less costly and to have fewest environmental impacts compared to other options of a wholly new road, containing the impacts of severance in a single broad corridor.

If East West Rail and the Expressway were to be developed along the same broad corridor then, analysis of land constraints 26 suggests that key opportunities for growth over the next 30 years could include:

the re-establishment of Milton Keynes as a development location of national significance, through the intensification and expansion of the town to a population of at least 500,000, in line with local aspirations. This presents an immediate opportunity for growth;

(CPRE Bedfordshire comment – this will double the population of MK)

development between Bicester and Bletchley, unlocked through the combination of East West Rail and the Expressway, with the potential to grow to city-scale, ultimately supporting a population in the hundreds of thousands. This could be the first new town in over a generation;

concentrated growth in the Marston Vale between Milton Keynes and Bedford, focused around a few key rail nodes in the area, and providing the critical mass to expand local services;

major development around Bedford, supported through the introduction of East West Rail services and the wider connections that exist via the Midland Mainline;

expansion in and around the Sandy area in central Bedfordshire, and along the A1 corridor, potentially supporting the development of a large town, exploiting new East West Rail and existing north-south connectivity via the East Coast Main Line. Delivering major growth may require other changes such as the re-alignment of the A1, and potentially relocating the existing East Coast Main Line station; and

a new garden town west of Cambridge, supported by a new station on East West Rail, and providing a satellite for those working in the city.

(CPRE Bedfordshire comment – now we know where the housing plans in the Local Plans really came from.)

P37

Recommendation 1a: Government should progress work on East West Rail, the Expressway and new settlements through a single co-ordinated delivery programme, with cross-government ministerial commitment and oversight.

£1bn to deliver the infrastructure necessary for a high quality and resilient rail commuter service between Bicester and Bedford, accelerating delivery of this section of East West Rail to a target date of 2023;

to accelerate work on the development of the new East West Rail line between Bedford and Cambridge, and commit to open the line by 2030; and

to deliver the 'missing link' of the Oxford-Cambridge Expressway, accelerating development work to deliver a clearly-defined and agreed route by 2025, enabling construction to begin as part of the next Road Investment Strategy (RIS 2) and be complete by 2030.

P39

Following the completion of Phase 3 of East West Rail, Bedford's connectivity will be significantly enhanced. The issue is whether the best location for a station is central or south of Bedford should be addressed in a way that is affordable and which secures the greatest benefits in terms of regeneration and new homes. In addition, the lack of eastern

facing junctions on East West Rail at Bedford and Milton Keynes could mean neither centre would have direct services toward Cambridge.

Government, along with local partners, should investigate the case and options for fully connecting the centres of Milton Keynes and Bedford. This should be considered as part of an integrated approach to housing and infrastructure, in line with the wider spatial strategy for the arc.

P40/1

The scale of the housing crisis within the arc – and the economic benefits that the UK will forego if it cannot provide homes for a future workforce – means governments at all levels should consider the case for direct intervention to ensure the delivery of new settlements. Public sector intervention should be focused on managing the risks that make the development of substantial new settlements commercially unattractive to developers. It should focus on providing assurance on the delivery of jobs, homes and supporting infrastructure at a pace which private developers alone may struggle to maintain.

(CPRE Bedfordshire comment – the housing crisis mentioned in the above para can be met by around 50% of the housing numbers currently proposed by Local Plans – this proposal by the NIC aims at increasing the population by up to +1.9m people equivalent to a community twice the size of Birmingham (1m people). This is planning madness. Even with all the infrastructure improvements planned, including East West Rail, The Expressway and A1 improvements, primary transport infrastructure will not be able to cope with this level of population and housing growth. The reason for encouraging this level of population growth is to ensure that house prices will continue to rise benefiting developers – not be more affordable for local people)

P44

Recommendation 2a: Government and local authorities should work together, through a robust and transparent process, to designate locations for new and expanded settlements by 2020.

P45

The delivery of new developments should not be of detriment to the interests of existing communities, nor need they have adverse impacts on the quality of the natural and built environment.

(CPRE Bedfordshire comment – no thought has been given to the local and rural transport infrastructure that will be required to support these extraordinary development proposals. No impact assessment on Bedfordshire's rural environment has been undertaken.)

P53

The development of new settlements and arc-wide infrastructure schemes should not compromise the high quality natural environment for existing and future residents. The development and infrastructure industry is moving towards employing a 'net gain' approach to biodiversity and natural capital – this should be encouraged by all parties with a stake in the future development of the arc. (nb natural capital = monetisation)

P55

Recommendation 3: Government should work with local authorities to:

put in place an independent design panel for East West Rail, the Expressway and new and expanded settlements across the arc by April 2018. This panel should work in concert with existing infrastructure design panels and new development corporations to specify, scrutinise and challenge settlement designs, plans and delivery, with a view to: making most efficient use of new and existing infrastructure (including transport and utilities);

supporting positive social outcomes (including better mental and physical health);

achieving net gains in biodiversity and natural capital across the arc; and

improving quality of life for existing and future residents.

establish arrangements for the long-term stewardship of valued community assets in each new or expanded settlement, placing responsibility and resources in the hands of the community – learning from both the Parks Trust in Milton Keynes and the Letchworth Garden City Heritage Foundation; and

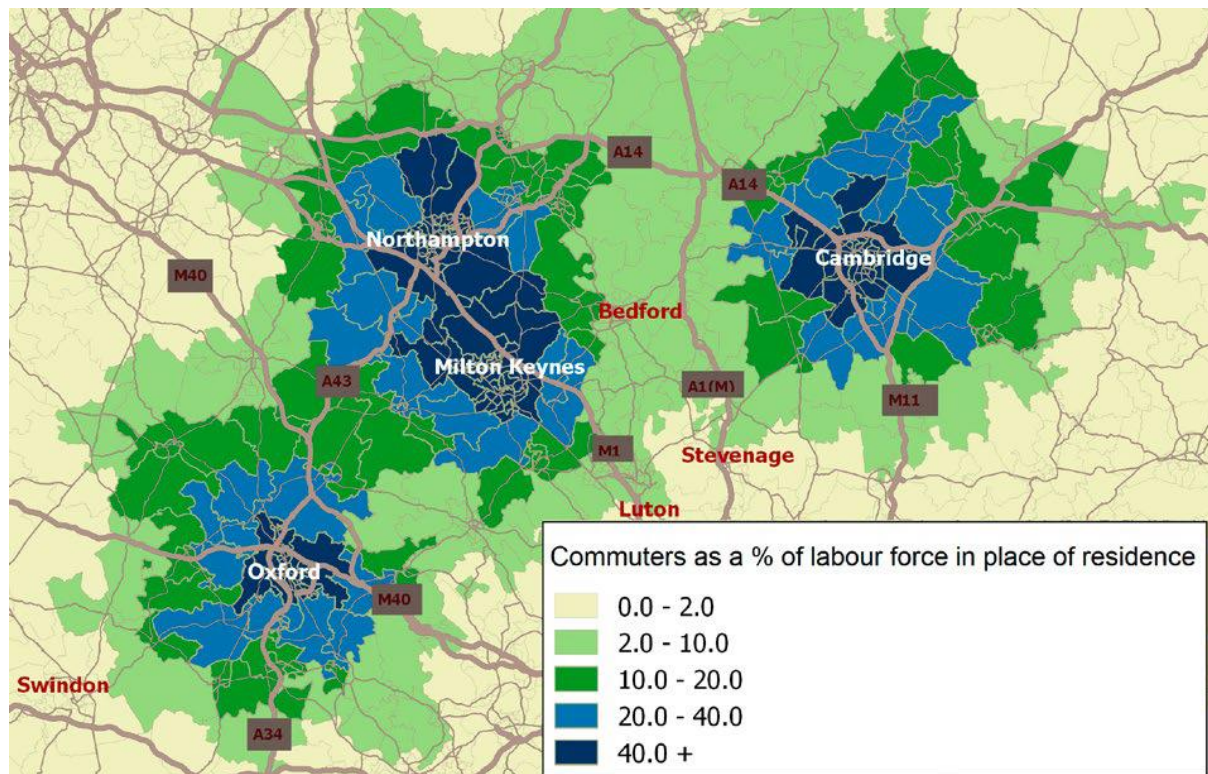
ensure that strategic infrastructure, including new elements of East West Rail and the Oxford-Cambridge Expressway are planned and developed, to achieve net gains in biodiversity and natural capital across the arc.

(CPRE Bedfordshire comment – no doubt this will be the unelected “England’s Economic Heartland Strategic Alliance” – Mayor of Bedford is on management team and Leader of Central Bedfordshire Council is vice – Chair)

P57

Even if the major development opportunities enabled by East West Rail and the Oxford-Cambridge Expressway and identified in Part Two were delivered in full, this would account for less than half of the homes required to support the arc’s future workforce. The majority of the arc’s future housing requirement will need to be met through development in and around existing towns and cities.

P58



(CPRE Bedfordshire comment - Bedford, Sandy & Luton have low commuter levels at the moment so why will they be 'travel to work areas'?)

P63

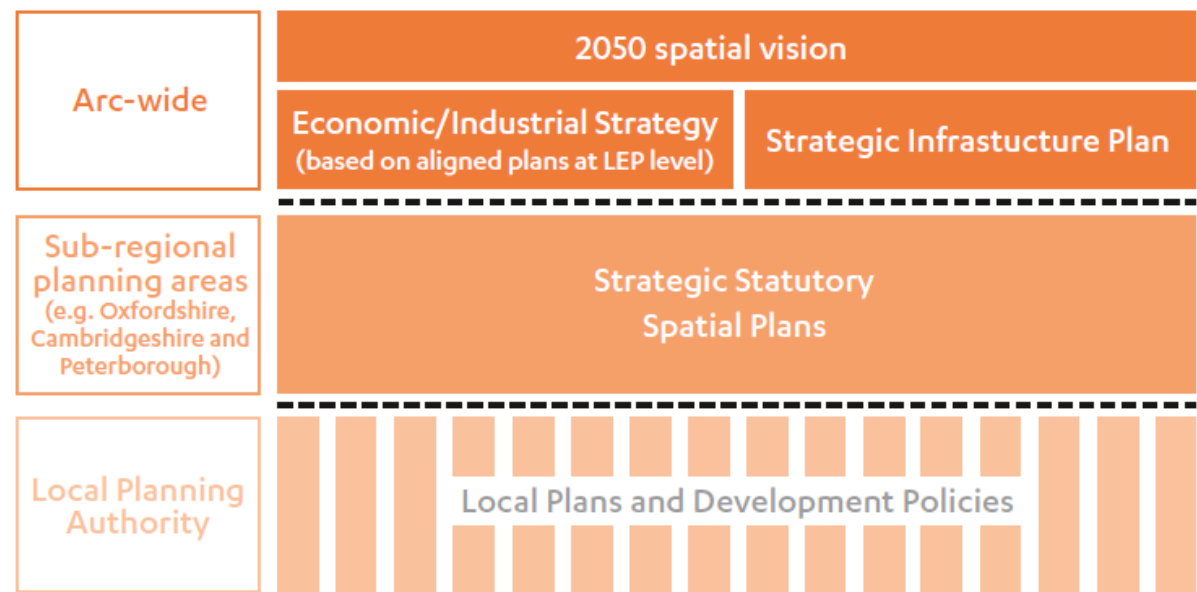
There is, therefore a need for Government and local authorities across the arc to work together to define and agree an indicative, long-term infrastructure pipeline setting out a schedule of schemes that may be brought forward subject to decisions on national investment, over the period to 2050. Any such pipeline should be scoped to consider the full range of **publicly funded** infrastructure.

(CPRE Bedfordshire comment – n.b. this excludes power and water)

P75

As well as a step-change in collaboration, the development of an integrated planning framework will require a fundamental shift in the scale at which local authorities work on planning and infrastructure issues. Rather than focusing exclusively on development within their own communities, they will need to work together to plan at the strategic level. This will require trade-offs and compromise between local interests. It is vital, therefore, that the arc-wide planning framework be supported by robust and transparent governance structures that enable collective decision-making.

Figure 12: an arc-wide strategic planning framework



(CPRE Bedfordshire comment: note Local Plans are now in the fourth level, i.e. largely irrelevant)

But any vision for the arc risks being lost if its practical expression requires up to thirty separate local plans: each articulated at the district level and each focused on allocating land to meet specific local housing and employment needs. It is vital that any strategic spatial plans be placed on a statutory footing.

(CPRE Bedfordshire comment - and the above para confirms it.)

CPRE Bedfordshire

December 2017