

25 January 2018

CPRE Bedfordshire's initial comments on Central Bedfordshire Council's Pre-Submission Local Plan 2015 - 2035, Jan 2018

INTRODUCTION

This document is a summary of our initial thoughts on Central Bedfordshire Council's (CBC's) **Pre-Submission 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 22nd February.

1. A Local Plan of 2 Parts

CPRE Bedfordshire is very concerned indeed that this Pre-Submission Local Plan 2035 has effectively taken the previous Draft Local Plan and split it into 2 parts:

Part 1 - The Pre-Submission Local Plan 2035 containing proposals for some 39,350 new homes which is intended to be submitted to the Government for approval by the end of March 2018 following this current consultation.

Part 2 - A Partial Review of the Submitted Local Plan 2035 (see page 2 para 1.5) assuming that it is approved by the Government appointed Inspector.

This will, say CBC, take place just 6 months after the Submitted Local Plan has been approved!

The Partial Review which is prompted by the National Infrastructure Commission's (NIC) report on development along the Oxford-Milton Keynes-Bedford-Cambridge Corridor incl. East/West Rail, could result in the number of new houses being increased to a massive 54,000 plus.

This, after CBC have said that they have listened to the concerns of local residents following the last consultation and reduced housing numbers from the high of 54,000 previously suggested.

In our view, this situation is untenable - residents of Central Bedfordshire will be quite rightly, totally confused and not a little amazed.

Having gone through all the work and consultations over more than 3 years, if the Plan is finally approved by the end of 2018 - the residents of Central

Bedfordshire will still have to go through a further detailed Partial Review which could see all that has gone before come to naught!

1.1 Local Democracy

Of further concern to CPRE Bedfordshire is the fact that the NIC may be able to push through their Plans for +1 million homes (20 cities the size of Cambridge) and a population increase of +1.9 million people (twice the population of Birmingham) across the Oxford Cambridge Corridor which is only 80 miles in length, with virtually no public consultation.

The leader of CBC, James Jamieson has already signed up to the NIC plans (see CPRE Bedfordshire's earlier reports on the Oxford - Cambridge Corridor) without any consultation with the people of Central Bedfordshire.

1.2 A Rushed Local Plan 2035

CBC have stated that they are rushing through this Pre-Submission Local Plan 2035 in order to get it ready for submission to the Government appointed Inspector by the end of March 2018 deadline.

This deadline was included in a recent government consultation called "The Right Homes in the Right Places" which suggested that a revised method of calculating new housing numbers would be imposed on LA's after that date.

The new calculation formula, if enforced by government, would result in the number of houses that Central Bedfordshire would be required to build to be increased from CBC's housing estimate (SHMA) of 32,000 to around 52,000 over the Plan period to 2035.

However, in CBC's last Draft Local Plan 2035 consulted on in August last year, the Council themselves proposed new housing numbers in the range 42,600 to 54,960!

The figure of around 55,000 is coincidentally, similar to that which could be arrived at if the sites suggested in this Pre-Submission Local Plan for inclusion in the Partial Review are adopted.

These are: New Town West of Luton, New Town at Tempsford, Major Urban Extension around Biggleswade, further 3,000 homes in Aspley Guise.

1.3 Oxford - Milton Keynes - Bedford - Cambridge Corridor

It is now quite clear from this Local Plan and from public statements made, that CBC and James Jamieson do not see East-West Rail, or the improvements to the A1, or the Oxford-Cambridge Expressway (which is pretty well completed through Bedfordshire - A421), as any more than a means to massive additional development, both housing and employment land.

The Plan Review will include a further +20,000 homes - equivalent to 5 new towns the size of Ampthill. See pages 35 to 37.

In the view of CPRE Bedfordshire, these and other major infrastructure improvements suggested by the NIC should be seen primarily as a means of:

- Cutting current peak time congestion levels on the primary and rural road networks and railways
- Reducing air pollution
- Moving to more sustainable modes of transport - East-West Rail
- Improving the Quality of Life of the people of Bedfordshire.

Not as a means to encourage 100,000's of people to migrate into Bedfordshire from elsewhere in the UK and a massive housebuilding programme that will not benefit local people.

PROPOSED HOUSING NUMBERS

2. A rushed Local Plan is a bad Local Plan

It is disturbing that crucial long term strategic planning decisions that will affect communities across Central Bedfordshire are being hastened through in this manner. In our view, the housing numbers included in the Pre-Submission Local Plan are a reflection of this haste.

2.1 In his introduction to the Pre-submission Local Plan 2035 Cllr Nigel Young states: **"We (CBC) are planning for up to 20,000 homes over the next 20 years"**.

This hugely understates the number of homes that will actually be delivered in the Plan period.

The actual figure is 39,350 new homes, double the figure promoted publically by CBC.

This kind of comment does nothing for the credibility of CBC.

To be clear, the calculation is as follows: (see Local Plan pages 40, 41 and 42 tables 6.1, 6.2 and 6.3)

The number of new homes that CBC are planning to deliver over the period 2015-2035 = 32,000 + Unmet need from Luton of 7,350 = a Total of 39,350 new homes (table 6.1).

Of this 39,350 homes, CBC have already committed to building (i.e. provided full or outline planning permissions) 23,528 homes over the Plan period (see table 6.2) - the majority of these homes have yet to be built.

So, the total number of additional homes that CBC need to deliver over the Plan period is: 39,350 - 23,528 = 15,822 new homes.

2.2 At worst, according to Cllr Nigel Young, CBC are planning to build up to an additional 20,000 new homes.

This is +4,178 (+26%) more homes than they are required to build i.e. the equivalent of a new town the size of Ampthill!

Table 6.3 gives the total number of homes that CBC has allocated to sites in the Pre-Submission Local Plan as 18,302.

If CBC choose this somewhat lower figure then it is +2,490 (+16%) homes greater than the 15,822 they are obliged to build i.e. equivalent to 2 medium sized villages.

CPRE Bedfordshire believes that these levels of contingencies are completely unacceptable and are leading to substantial areas of land being allocated for development that need not be.

We are not aware of any other Local Authority that builds in this massive level of contingency.

2.3 Through a “Freedom of Information Request” we have established that 60% of CBC’s housing Need (39,350) are for people who will be encouraged to move into the area from other parts of the UK.

The housing needs of all the people of Central Bedfordshire can therefore be met by just 40% of the houses that CBC plan to build.

2.4 Housing need

We believe that CBC’s estimate of housing need is hugely over-estimated.
Our calculation is that CBC’s housing need should be around 32,200 (Including Luton’s unmet need) compared to 39,350 - a substantial reduction.

This is more than adequate for the needs of local people plus a far more reasonable level of inward migration into Central Bedfordshire.

For details of our calculation please see our detailed submission to the Draft Local Plan 2035 Consultation which can be found here:

<http://www.cprebeds.org.uk/news/item/2325-central-bedfordshire-s-draft-local-plan-consultation-our-response>

2.5 Affordable Homes

CPRE Bedfordshire supports CBC’s Housing Need Assessment that requires 30% of all housing to be affordable housing. By this we mean affordable rent, social rent and shared ownership.

This level of affordable housing should be implemented on all housing developments no matter where they are located.

In addition to an overall Affordable Homes commitment, we would like CBC to specify a minimum proportion of the 30% that should be committed for social rent.

EMPLOYMENT AND COMMUTING

3. The 39,350 new homes that CBC plan to build will generate approximately 50,000 additional workers.

The Pre-Submission Local Plan states that CBC will create 24,000 new jobs.

This means that an enormous +26,000 additional workers will commute to work outside Central Bedfordshire.

We have seen nothing in the Pre-Submission Local Plan that shows that CBC have properly considered the impact of this level of additional outward commuting on the road and rail transport infrastructure.

3.1 Cumulative impact of commuter numbers

There will be a huge cumulative impact due to the increasing number of commuters that can be expected from additional housing planned in neighbouring Local Authorities e.g. Bedford Borough, Hertfordshire, Milton Keynes Cambridgeshire Buckinghamshire etc. etc.

All of these L.A.'s. are following similar inflated housing scenarios and generating massive numbers of commuters all seeking to use already overcrowded transport infrastructure - often the same infrastructure.

No analysis has been conducted to determine the cumulative impact.

Impact on Green Belt/Areas of Outstanding Natural Beauty/Water Supply Issues etc.

In addition to the above, CPRE Bedfordshire has very serious concerns regarding the impact of the proposed housing and employment developments included in the Pre-Submission Local Plan 2035 on the Green Belt, the areas of AONB and Water Supply issues.

These have all been covered in detail in our submission to the earlier Draft Local Plan 2035 July/August 2017 consultation. We will be updating our response to take into account the final site selections but our concerns remain over these matters and our overall position has not changed.

This submission can be found here.

<http://www.cprebeds.org.uk/news/item/2325-central-bedfordshire-s-draft-local-plan-consultation-our-response>

CPRE Bedfordshire would like to remind readers that responses to past consultations are not taken into consideration when the Inspector comes to review this version of the Local Plan - the "slate is wiped clean" so to speak.

The Government Appointed Inspector will be advised and take note of all comments made to this consultation however so it's important to submit your comments.

If you wish to speak at the Inspection in Public then please ensure that you make this clear when responding.

Also, if you have registered to speak and have come across new evidence since the consultation you may be able to bring it forward at the Inspection in Public.