

18 February 2018

**CPRE Bedfordshire's response to Central Bedfordshire Council's
Pre-Submission Local Plan 2015-2035 Consultation**

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**Sent to Central Bedfordshire Council by: registered mail, by email to Andrew Marsh,
Planning Policy as agreed by him and by completing the online response.**

CPRE Bedfordshire would like to appear and speak at The "Inspection in Public" in order to provide more detailed explanations of the objections and comments we have outlined in this response.

1. Introduction

The following are CPRE Bedfordshire's comments on Central Bedfordshire Council's Pre-Submission Local Plan. For the sake of completeness we have kept this as a single document but identified within it the relevant sections of the Plan to which our comments and objections relate.

The issues identified follow the structure of the Plan.

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.

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.

We want the right type of development, which we can all be proud of, in the most appropriate locations which will enhance the very special character of Bedfordshire.

We have made extensive representations to CBC's previous Local Plan consultation on the issues detailed below and would wish to speak at the Local Plan Inquiry.

2. Lack of Duty to Cooperate - Local Plan Para 1.7.3 - 1.7.5

We do not consider that the Plan is legally sound due to the Council not meeting its "Duty to Cooperate". With regard to the Duty to cooperate, the Plan also fails to meet the tests of "Soundness", in particular it is not Positively Prepared, Justified, Effective or Consistent with National Policy

Our reasons for this are set out below.

2.1 Lack of evidence

Para 1.7.4 of the Plan refers to meetings with neighbouring Authorities, the preparation of Strategic Frameworks identifying cross boundary issues and statements of common ground but no information has been produced such as minutes or draft documents to evidence the progress CBC has made on this.

Government Planning Guidance on The Duty to Cooperate states:

"Do local planning authorities have to provide any information on how they have met the duty?"

Yes, local planning authorities must give details of what action they have taken under the duty to cooperate to their communities in their Authority Monitoring Reports ([Town and Country Planning \(Local Planning\) \(England\) Regulations 2012, regulation 34\(6\)](#)). This should include actions to both secure the effective cooperation of others and respond constructively to requests for cooperation. It should also highlight the outcomes of cooperation. This should be done at least once a year and information should be published on the local planning authority's website and made available for inspection at their offices.

Paragraph: 022 Reference ID: 9-022-20140306

Revision date: 06 03 2014"

During the entire period over which CBC has been developing the Local Plan we have seen no Authority Monitoring Reports from CBC to their community explaining what meetings they have held, what subjects they have discussed, and what actions they have agreed with Duty to Cooperate partners regarding the development of this Local Plan.

The Duty to Cooperate (DtC) issues e. g.:-

- The impact of CBC's Local Plan policies on DtC Partners
- The issues that DtC Partners would like CBC to take into account when developing policies
- Common regional issues that need to be taken into account in CBC's Local Plan

are extremely important to the development of CBC's Local Plan and to the residents of Central Bedfordshire who will be impacted by these decision, agreements and plans.

Residents of CBC and others interested in the development of the Local Plan therefore have a legitimate interest in the actions that CBC and their DtC partners have taken during the development of their Local Plan.

CBC should have published regular DtC updates making their communities aware of issues being discussed as the Local Plan was being prepared - they did not do so.

Specific examples of issues that are of importance and of legitimate interest to communities are:

- **The London problem**

One of the largest "impactors" on Central Bedfordshire's housing stock is London and the GLA.

Details of any discussions held with The Mayor of London/GLA should be made public as should the fact that no discussions took place if that was the case.

CPRE Bedfordshire believes that detailed discussions with The Mayor of London and the GLA should have taken place and that one of the issues to be raised is the fact that London has refused to build the number of Affordable Homes required by its citizens. By not doing so huge pressure is placed on the housing market in Central Bedfordshire

- **Impact of increased housing numbers on hard and soft infrastructure**

CBC are not developing their Local Plan in isolation, BBC is also developing their Local Plan as are Milton Keynes, North Hertfordshire and others.

It is really important that the impacts that one has on the other are properly understood and debated publically.

- **South East Midlands Local Enterprise Partnership (SEMLEP)**

SEMLEP is a DtC Partner with considerable influence in the region - their input into the CBC Local Plan process is important for all to know and take into account.

All of the above issues and more, are an integral part of the Local Plan democratic process and CBC should have released details of all DtC actions they have engaged in and those they have not, at least on an annual basis but ideally more frequently during the development of the Local Plan.

3. Consultation and Engagement - Local Plan Section3

We do not consider the Plan is legally sound due to the lack of a proper consultation process.

Our reasons for this are set out below.

3.1 The Consultation Process

CPRE Bedfordshire has very serious concerns regarding the consultation process undertaken by CBC.

These concerns were raised during the previous consultation on the draft Local Plan.

Reacting to adverse comments from our Town & Parish Council members, we wrote to James Jamieson, Leader of the CBC on 18 July outlining our particular issues and those of our Parish Council members and others.

These related principally to the date of the Consultation period (4th July till 29th August) which was over the main Summer Holiday period. Many Town & Parish councils do not hold meetings during August and so local councillors take their holidays at this time.

We noted too that the public “drop -in sessions” were also held during the principle holiday period and at a very limited number of locations.

In our response to the previous Draft Local Plan consultation we urged “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.”

This has not happened.

3.2 Lack of feedback from previous consultation

There has been no meaningful or substantive, quantitative or qualitative analysis of the comments or objections made during the last consultation process (which contained no definite site specific allocations) or any detailed explanation of how these comments and feedback have influenced the pre-submission Local Plan.

We wrote to The Director of Regeneration & Business, CBC on this matter on the 5 Dec 2017.

The last minute schedule produced by the CBC is very high level and does not provide any analysis of the extent of objections on certain issues.

CBC has been releasing comments made on the previous Draft Local Plan during this consultation process, it is clear from these that the CBC has not allocated comments in a clear and consistent manner to the relevant sections of the Plan.

In addition, whilst it is very clear from the wording of a representation that it is an objection to a draft policy, unless the representation contains the word “object”, it has been treated by CBC as a comment rather than an objection.

3.3 Changes in Site Allocations

Sites, which in the previous Draft Plan had been discounted from the site selection process and according to that Plan were to be “excluded from Local Plan process” have now, suddenly, appeared as allocations in this Pre-Submission Local Plan. CBC has not explained why this has happened or brought attention to these changes in status which has led to confusion amongst local residents as to the overall process of site selection.

3.4 Form of Consultation

There have been an extremely limited number of “drop-in” presentations at locations across Central Bedfordshire during both consultation processes. At presentations relating to the last Draft Local Plan a number of residents and Parish Councils have reported how Officers have not been able to answer questions over the site selection process or other aspects of the plan.

In addition, Officers and Members have been presenting the Plan as a “fait accompli” using Central Governments’ proposed higher housing numbers as a threat to not accept the proposals in the Plan. This has stifled any constructive debate.

3.5 Inadequate public engagement - a growing democratic deficit

We remain concerned over the “democratic deficit” with many residents still 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 have 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.

The CBC Local Plan Consultation statement states that 6828 stakeholders responded to the previous Local Plan Consultation.

This represents just 4% of the working age population (172,000 source EEFM) - hardly a successful engagement with CBC residents.

The first stage Local Plan Consultation which CBC rates as being so successful generated a response from just 785 Stakeholders - 0.5% of the working population.

3.6 Impact of the Oxford to Cambridge Corridor

The Plan 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 is used to justify the early Plan Review which will lead to even higher housing numbers proposed. We have commented on this in our objections to the Partial Plan Review (s1.5, 5.5 and 7.4).

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, which was submitted in September 2016, calls for the development of 1 million new homes (+37% increase) and an increase in population of 1.6 million (+25% increase) across the “Corridor” over the next 35 years. 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 or been the subject of any Consultation.

We believe that the action taken by the Leader of CBC pre-determined the outcome of key parts of this Local Plan.

3.7 Misleading information including the understatement of housing numbers

The Forward to the Pre-Submission Local Plan refers to 20,000 new homes as the number to be built over the Plan period.

“We are now planning for up to 20,000 homes.....over the next 20 years”

This statement has been very widely repeated in CBC literature distributed to Town & Parish Councils and to members of the public.

It has been repeated and used to justify the housing numbers in the Local Plan in Press Statements and on Press Releases.

This is extremely misleading and seeks to underplay the reality of the situation which is that the Council is in fact planning to deliver 32,000 new homes over the Plan period and 39,350 new homes including Luton’s unmet need.

The previous Draft Local Plan stated that CBC was going to: “...deliver between 20,000 and 30,000 new homes”.

In fact, they were planning for between 42,600 and 54,960 new homes over the Plan period.

These lower figures were also repeated in all CBC literature, Press releases etc.

3.8 Flawed Plan Formulation Process - 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 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.

4. Partial Plan Review - Local Plan paras: 1.5, 5.5, 7.4

We do not consider the Plan is Sound as it is not Positively Prepared, Consistent with National policy, Justified or effective in respect of the proposals for an immediate Partial plan review as detailed in s1.5, s5.5 & s7.4

We consider the proposals for a Partial Plan review to be pre-mature and unnecessary. The reason for the Review appears to be that more certainty is required on the timings and routeing associated with the Cambridge-Milton Keynes- Oxford Arc.

Studies associated with this project predict it will act as a catalyst for significant economic growth across the Arc resulting in considerable additional demand for employment land and housing.

CBC consider therefore that the proposed allocations in the Plan may not be sufficient during the plan period to meet this potential demand and further allocations will be required towards the end of the Plan period.

Para 5.5.3 states that CBC is undertaking further assessments of the sites identified in s7.09 to inform the Partial Plan Review

CBC is proposing to commence this Review within 6 months of adoption of the Local Plan.

Adoption according to CBC's Local Development scheme (December 2017) is likely to be October 2018. The Review is to complete "as soon as decisions on routeing and financial commitment to strategic infrastructure are in place"

Whilst the current Government are supportive of the concept of the Arc (which was first suggested in 2003) there is still a long way to go before this support translates into firm financial commitment and the completed infrastructure.

The Government have 6-12 months from November 2017 before they respond formally to the National Infrastructure Commission's (NIC) report. Even assuming matters progress smoothly current Government estimates are that the earliest the road express route will open is 2030 and (with an accelerated programme) the first rail passengers services across the Arc will not be before 2025.

These are highly ambitious targets and as with any major infrastructure project of this scale there is huge potential for delay and changes to the extent and funding commitments of the project.

We agree that the CBC should be continuing to extend and improve its evidence base so it has accurate information on the true extent of potential economic growth in the District from the project and what additional land may be required in the future. However there is absolutely no need to start a Partial Plan Review until there is a much greater degree of certainty on the project proceeding and much greater clarity over the growth implications.

To start this within 12 months is totally premature and unnecessary, and we would urge all mention of the Partial Plan Review to be removed together with the Identified Areas for Future Development detailed in s7.9 and Appendix 7.

Furthermore, CBC have said in this Local Plan that they have listened to residents and reduced housing numbers from the high of around 54,000.

In our view, this Plan Review proposal 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 Local Plan is finally approved by the end of 2018 - residents will then be faced with a further detailed Partial Review within 6 months which could see all that has gone before come to naught!

So much, they will say, for local democracy!

5. Housing numbers - Local Plan section 6.9

We do not consider the Plan is Sound as it is not Positively Prepared, Justified or Effective in respect of the calculation of Housing numbers as detailed in s 6. 9.

We believe that CBC's estimate of housing need is hugely over-stated.

CBC's housing need determined by their SHMA is 32,000

Calculations shown in section 6.9 indicate the following:

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.

According to the Local Plan Foreword, CBC is 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 new homes that CBC has allocated to sites in the Pre- Submission Local Plan as 18,302.

If CBC chooses 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.

5.1 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 23,528 homes - see Local Plan page 41 Table 6.2.

As stated in the Local Plan, Para 6.9.3, it would be quite correct to add to this figure 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.

The figure of 23,528 therefore also carries quite a high level of contingency.

5.2 Luton’s Unmet Housing Need

In CBC calculations (see table 6.1 page 40) Luton’s Unmet Housing Need has been included as 7,350 homes. This represents 80% of Luton’s total unmet need of 9,300 dwellings established by the Inspector when agreeing to Luton’s Local Plan in 2017.

It is proposed to meet all of this through removal of land from the Green Belt which we do not accept.

We feel that it is entirely unreasonable to expect that Central Bedfordshire meet such a large percentage of the housing required.
It seems to us that other LA’s within the same Housing Market Area should accept a more reasonable proportion of Luton’s housing need.

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

6. CBC’s estimate of housing need - Local Plan Strategic Housing Market Assessment (SHMA)

We do not consider the Plan is Sound as it is not Positively Prepared, Justified or Effective in respect of the SHMA updated 2018 - Technical Background Supporting Document

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 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.

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 112 para 5.87 and Figure 92.

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.

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.

6.1 Linkage to employment

CBC states that it plans to deliver a minimum of 24,000 new jobs over the Plan period

The 39,350 new homes that CBC plan to build will generate a maximum of 50,000 additional workers.

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.

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.

7. Affordable Homes - Local Plan Policy H4

The Policy H4 is not sound as it is not positively Prepared or Justified for the following reasons

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.

8. The proposed Locations for Growth Option Areas and Housing Allocations - Local Plan section 6

The policies contained in Section 6 are not Sound as they are not Positively Prepared, Justified, Effective or Consistent with National Policy for the following reasons

CPRE Bedfordshire agrees with the rationale that lies behind the general classification of Central Bedfordshire into 4 distinct areas.

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.

8.1 Non conformity with National Planning policy - NPPF paras Green Belt 79-92 and AONB paras 115 & 116

In addition, the proposed allocations for Growth within the Areas do not conform to National Planning Policy Framework or Planning Policy Guidance. It is recognised in the Plan that the South Area is included within the Green Belt and contains 2 large areas of land in the Chilterns Area of Outstanding Natural Beauty. This is the most constrained part of Central Bedfordshire in terms of national landscape designation and Green Belt constraint.

This has however been ignored and the Plan focusses significant development within this including almost a third (by unit numbers) of the strategic housing allocations and significant employment allocations.

This distribution is not in conformity with national policy that great importance should be given to the Green Belt and great weight given to conserving AONBs (NPPF para 115).

Major development in AONBs should be avoided except exceptional circumstances (NPPF para 116) and that allocations should be directed to land of the least environmental or amenity value (NPPF paras 17 and 110).

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 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.

8.2 Proposed locations for Growth - Local Plan Section 6

The following sites have been identified in the Plan to have potential for the large scale development of New Towns and large Urban Extensions:

<u>Location</u>	<u>Number of homes</u>
North of Luton	4,000
East of Biggleswade	1,500
East of Arlesey	2,000
Marston Vale	<u>5,000</u>
<u>Total</u>	<u>12,500</u>
<u>Partial Plan Review</u>	
Land West of Luton	2,000
Land at Tempsford	10,000+
Land East of Biggleswade	5,000
Aspley Guise North of railway line	<u>3,000</u>
<u>Total - Partial Plan Review</u>	<u>20,000</u>
<u>GRAND TOTAL</u>	<u>32,500</u>

8.3 Evidence base for New Towns and urban extensions

At the previous Draft Local Plan Consultation CPRE Bedfordshire mentioned our concern that these strategic locations had 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 primary and rural road network?

8.4 Traffic flow impact evidence

We were very surprised that for settlements of this size there had 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.

We commented at the time of the previous Draft Local Plan consultation that:

**“Without this comprehensive evidence base CPRE Bedfordshire rejects 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.”

Now, with this pre-submission version of the Local Plan, some attempt appears to have been made to include some of this analytical data but too late to enable us and others to be able properly examine the data used.

This is a very unsatisfactory situation.

No evidence base has been provided for the New towns and Urban Extensions proposed for the Partial Plan review and so we reject them out of hand.

9. Settlement envelopes and hierarchy - Local Plan Section 9

The policies contained in Section 9 are not Sound as they are not Positively Prepared, Justified or Consistent with National Policy for the following reasons

Flawed evidence base - Initial Settlement Capacity Study

Our previous representations drew attention to what we believe to be flaws in the manner with which CBC have considered allocation of dwellings between settlements. In particular the **Initial Settlement Capacity Study July 2017** was conducted with far too high numbers of homes in each category e.g. “High” (>5000 new homes), “Medium” (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 suggested in our previous representations that a more refined split should be 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.

However these comments and suggestions appear to have been ignored.

Harlington

CPRE Bedfordshire objects to the number of new homes proposed for Harlington

By way of a second example, illustrating the flaws in the process and using the example of Harlington:

Harlington (population 2300) has been put into the same category of Minor Service Centre which is also used to describe the very much larger Barton (pop 5000) and Toddington (population 4590).

Barton and Toddington both have large high streets with a considerable variety of retail outlets as well as Post Offices and choice of cafes, restaurants and pubs, community venues and areas for car parking.

Both have direct access to major roads - Barton is on the A6 and Toddington close to the M1 J12 as is Harlington.

Both have wide main roads and access roads for traffic.

Harlington is surrounded by Green Belt, has narrow winding country roads that are blocked by parked cars as the village centre is mediaeval and includes a church and manor house etc. Older houses not built with parking of any sort.

Newer areas are not much better served and all streets are used for commuter parking. Barton has a Bank and Barton and Toddington have a library, both have good GP services and bus services to other towns.

The Harlington village does have a station however the capacity study also included facilities that no longer exist - and so was highly flawed.

The proposed increases for each are:

Town	Population	Dwellings	Dwellings proposed	% increase
Barton	5000	2155	666	+31%
Toddington	4590	1970	251	+13%
Harlington	2300	960	589	+61%

As we have stated 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 3.1 and 3.8 above, local communities through their Town and Parish Councils should have been more fully 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 have yet to see detailed proposals from CBC regarding how current issues regarding infrastructure will be overcome to account for the higher housing numbers proposed

9.1 Development on AONB and SSSI sites

CBC has enabled potential housing development sites to progress through to the 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.

This is directly in conflict with their proposed Local Plan Policy EE3 - Nature Conservation p187.

It is also in contravention of NPPF policies 115 and 116 because exceptional circumstances have not been demonstrated.

10. Implementation - Local Plan Section 7

The policies contained in s7 are not Sound as they are not Positively Prepared, Justified, Effective or Consistent with National policy for the following reasons

We have commented separately with our objections to the release of Green Belt land. With regard to our views on strategic allocations, we would comment specifically on the following:

10.1 Policy SA1 North of Luton 4,000 homes

CPRE Bedfordshire objects to this Policy

The sites lie entirely in the Green Belt and also on the edge of the Chilterns AONB. The site is extremely sensitive and important areas of open countryside on the urban fringe. It incorporates areas of ancient woodland and is a haven of biodiversity. **For all the reason detailed in our objections to s6 and s8 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.

10.2 A6 - M1 Link Road - proposed as part of the Luton North Development.

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

In earlier Draft Local Plan consultations CBC has shown routes for this proposed new road which is linked to both the Luton North development SA1 and SE 1, the Sundon Rail Freight Interchange.

In the last Draft Local Plan Consultation the A6 - M1 link road was included in Draft Policy T6.

The A6-M1 Link road now appears to be incorporated in to Policy SA1 and the route shown on the "Key Diagram" map shown at para 7.4.

We believe that this action has been taken due to the widespread concern previously expressed by a range of organisations, including our own, regarding the route of the A6-M1 link road which has been previously proposed by CBC.

The previously proposed route, which was never consulted on publicly, raised very serious concerns because it cut into The Chilterns AONB.

CBC's Policy SA1 states, bullet point 9:

"...With the exception of the (A6-M1) link road any major development within the AONB shall require exceptional circumstances to be demonstrated and shall only be permitted where it can be demonstrated it is in the public interest."

It is our view that all development needs to demonstrate exceptional circumstances if it impacts on the Chiltern's AONB and we object strongly to the inclusion of this paragraph.

Our comments to the previous consultation regarding the A6-M1 link were as follows and remain valid. They are:

- i). the route is too far north, cutting into the Chilterns AONB*
- ii). 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*

10.3 Policy SA 2 Marston Vale - New Town 5,000 homes

CPRE Bedfordshire objects to this Policy

To us, this proposal is an example of excessive over development with far too many homes planned for the site.

It is entirely within the Forest of Marston Vale which was created to deliver environmentally led regeneration of the area.

There is very little solid evidence to support this level of development on this site and the impact from a development of this size on both the primary & rural transport networks and the proposed East/West Rail has not been properly assessed in our view.

Recent developments agreeing to the development of a new Incinerator nearby will itself generate over 500 HGV movements a day.

There are also potential air pollution issues from the incinerator itself.

We would also like to see details of the “**Duty to Cooperate**” assessment of the impact of the Marston Vale New Town development on surrounding Local Authority areas in terms of all forms of hard and soft infrastructure.

A detailed impact assessment of the New Town on Marston Morretaine should also be made available.

10.4 Policy SE1: M1 Junction 11a Sundon Rail Freight Interchange

CPRE Bedfordshire objects to this Policy

For the reasons laid out in our comments on s12.5 of the Plan - Strategic warehousing (see page 21) 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.

10.5 Policy SE2 M1 Junction 13 Marston Gate Expansion

CPRE Bedfordshire objects to this policy

For the reasons laid out in our comments on s12.5 of the Plan - Strategic warehousing (see page 21) and the impact development of this site would have on the Greensand Ridge Nature Improvement Area (NIA) CPRE Bedfordshire opposes this policy.

It is also contrary to this proposed Local Plan Policy EE8 Greensand Ridge Nature Improvement Area, which calls for development to: “**Respect the topography and landscape of the NIA...**”

11. Green Belt, Coalescence and Settlements - Local Plan Section 8

The policies contained in s8 are not Sound as they are not Positively Prepared, Justified, Effective or Consistent with National Policy for the following reasons

The Plan proposes the release of over 400 ha of green belt land for housing and over 60 ha for employment. Over 43% of all housing units are proposed on what is currently Green Belt Land.

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.

11.1 The Plan does not conform with National Planning policy

The Green Belt should have been considered as a constraint when setting housing targets.

The Draft Local Plan is not compliant with national policy as it does not take sufficient account of Green Belt constraints on development. This is in direct conflict to the Secretary of State's 2016 statement that Green Belt should be 'absolutely sacrosanct'.

Paragraph 45 of the Planning Practice Guidance clearly states that councils should take account of policies such as the Green Belt which indicate development should be restricted.

"Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need."

This guidance has been ignored in the draft Local Plan.

Paragraph 44 of The Planning Practice Guidance states that:

'The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies ... Such policies include ... land designated as Green Belt'.
<http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/stage-5-final-evidence-base/>

11.2 Lack of exceptional circumstances

Government has repeatedly made it clear that demand for housing is unlikely to be accepted as the exceptional circumstances needed to justify changing Green Belt boundaries. Brandon Lewis MP, the then Housing Minister, in a letter to MPs in June 2016, when referring directly to the Local Plan preparation process, stated that "we have been repeatedly clear that demand for housing alone will not change green belt boundaries".

CBC is, in its draft Local Plan, clearly justifying the release of Green Belt by arguing it is needed for housing. However as stated in our comments to S6 (4.1 and 4.2 above) of the Plan, this is unsustainable in providing the housing needed and thus cannot warrant exceptional circumstances.

11.3 Lack of evidence to support Green Belt release

11.3.1 Central Bedfordshire & Luton Green Belt Studies

As a starting point CBC's independent Green Belt study stages 1 and 2 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 studies 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.”

Although the Stage 3 Green Belt study has only just been released it would appear to have been carried out prior to the previous round of consultation as the Final Report was submitted to the CBC on 28th April 2017.

The study claims to identify the level of harm to the Green Belt which would result from release of sites, or parts of them.

The study makes it clear that CBC must separately demonstrate there are exceptional circumstances for changing the green belt boundaries. It also acknowledges that as with the other studies it has not taken into account environmental, policy or land use- constraints such as SSSIs and floodplains.

Unlike the other studies this was only carried out for Central Beds and despite the study claiming it is assessing those which “have passed the initial sieving process” the sites considered do not correlate to the Green Belt sites identified as shortlisted for development in the previous consultation.

Some of the previously shortlisted sites have not been assessed as part of this study.

It is not therefore comprehensive or seen to be building on the other studies but has been carried out in isolation to the site selection process. It adds no further justification for the release of sites from the green belt.

The sites identified are not the ones which are contributing least to the green belt or would cause the least harm if they were released. The majority are performing well and in a number of cases strongly, and would harm the green belt if released. Indeed 5 sites have been added to the allocations.

These had previously been “excluded from the Local Plan process” due to the important contribution they make to the Green Belt as set out in the Council’s own studies.

The release of these sites will fundamentally change the character of the towns and landscapes within the Green Belt. In many cases they represent significant increases in the built form of these historic settlements.

Over 48% of the sites identified within the small and medium allocations are on what is currently Green Belt Land. For example:

. Village	. Proposed Increase in dwelling numbers ¹
. Barton Le Clay	. 31%
. Chalton	. 25%
. Harlington	. 61%
. Hockcliffe	. 25%
. Westoning	. 26%

¹ Taken from CBC 2015 ward profiles

Despite the endorsement of the existing Green Belt, the contents of the Green Belt studies have therefore 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.

11.3.2 Technical studies

Within the Plan it is suggested at para 8.2.3 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.

This is not the case.

Urban Capacity Study

CBC'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, CBC could:

- 1. Increase development densities on other sites.**
- 2. Reallocate surplus employment sites for residential use.**
CBC's employment Land review identified 12 sites with planning permission (but not yet developed or completed) which should be critically reviewed by the CBC 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**

Whilst the sites identified in 2 above are contained in Appendix 4 of the Plan - there is no commentary on what action/discussions has taken place on these or the recommendations in the ELR to reduce the amount of employment land in some of the mixed use allocations - which presumably could be reallocated for residential use.

11.3.3 Sustainability Study

CBC'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 CBC 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. Whilst the stage 3 study considered “harm from releasing sites or parts of them there was no cumulative impact assessment of releasing all the land proposed within the Plan.

11.3.4 Site Assessment Technical Document

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

CBC has however automatically passed any sites designated as performing 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.

As stated in para 7.1 the proposed allocations within the Plan are not the sites which are contributing least to the green belt or would cause the least harm if they were released. The majority are performing well and in a number of cases strongly and would harm the green belt if released. Indeed 5 sites have been added to the allocations which had previously been "excluded from Local Plan process" due to their important contribution to the Green Belt according to CBC's own studies.

11.3.5 Brownfield register

CBC has updated their Brownfield Register which now contains only 13 sites as opposed to the 33 on the pilot register. It provides for 1306 dwellings (700 on one site). We would question how this justifies loss of Green Belt land in particular:-

- i. It does not appear to contain any assets owned by CBC despite a number of these appearing as Vacant in CBC's list of their property assets which appears on their web site;
- ii. The list does not contain sites of under 0.25ha. These smaller sites often in rural areas can provide a key element of meeting the Government's 20% small site target;
- iii. There is no analysis or allowance for windfall brownfield sites within the plan period particularly of public sector owned land
- iv. We can see no brownfield land strategy setting out how these sites will be brought forward for development.

11.4 Conclusion

In conclusion, CPRE Bedfordshire fails to see how CBC 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 CBC'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.

12. Employment and Economy - Local Plan Section 12

12.1 Strategic warehousing sector - section 12.5

The policies contained in s12.5 are not Sound as they are not Positively Prepared, Justified or Effective for the following reasons

We fully support CBC's ambitions to strengthen and improve the local economy.

We do not support however the identification of the logistics and distributions sector as one of the priority sectors to target for additional employment (para 12.1.8)

CBC plan to deliver a minimum of 24,000 new jobs over the Plan period. Within this figure around 6,000 jobs (25%) will be delivered from the Strategic Warehousing Sector - see para 5.1.4

In total, 140ha have been allocated to B8 warehousing which is totally excessive and unnecessary.

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 employment numbers 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. (Job densities: the amount of space per worker in an office development is typically 8-13 sq. m. per worker compared to 36-47 sq. m in an industrial building and 70-95 sq. in a warehouse)¹.
- (iv) Development land within the District is scarce due to the national environmental designations such as Green Belt AOB etc. Additional and unnecessary development pressure should not be placed on these areas of the District
- (v) 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
- (vi) Increasing traffic will increase air pollution.

¹HCA Employment density guide (3rd edition)

As recognised by CBC in the Plan (12.5.1) and CBC's FEMA and ELR (5.76), this demand is extremely footloose and providing the accessibility is right, developers and occupiers will consider sites over a wide radius.

If there was a ready supply of surplus brownfield sites in suitable locations the strategy of attempting to attract these types of users may be a robust one.

But this is not the case. The sites which have been identified are in extremely sensitive locations. SE1 lies within the Green Belt and SE2 immediately abuts the Greensand Ridge Nature Improvement Area.

See our site specific objections for more details on these sites.

In addition neighbouring Authorities such as Milton Keynes are proposing large scale allocations which would satisfy this demand.

Over allocations run the risk of land remaining undeveloped and economically sterile.

Para 12.5.2 of the Plan states that the ELR identifies that unless sites are specifically allocated for these uses then they will continue to displace local demand on other sites.

Although the ELR identifies this as a trend, it also highlights the very site specific requirements of these users and that there is currently an oversupply of industrial land and allocations within the District.

This coupled with the growing number of proposed warehousing allocations in the Region would mitigate against displacement of local users.

There is therefore no justification for these additional allocations.

13. Transport - Local Plan Section 14

The policies contained in s14 are not sound as they are not Positively Prepared, Justified, Effective or Consistent with National Policy for the following reasons

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.

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-roadchallenging-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.

CBC have not submitted any information from the Duty to Cooperate (DtC) Meetings that have had with DtC partners to suggest that this hugely important issue has been discussed and if so the details of any agreements reached or plans made - **see our comments regarding CBC’s Duty to Cooperate** - pages 2&3.

We look forward to CBC providing details of the expected increase in HGV traffic over the Plan period due to the development proposed in this Local Plan.

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.

14. East - West Rail. Local Plan Section 2 Key Themes, Challenges & opportunities para 2.2.1

The policies contained in s14 are not sound as they are not Positively Prepared, Justified, Effective, or Consistent with National Policy for the following reasons

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.

15. Air Pollution -- Local Plan Section 16 Climate change & sustainability

The policies contained in s14 are not sound as they are not Positively Prepared, Justified, Effective, or Consistent with National Policy for the following reasons

Absence of study to determine impact of Local Plan proposals

Despite the critical importance of this issue and the responsibility placed on Local Authorities to reduce air pollution in their areas, we have been unable find any substantive elements of this Local Plan that refer to the matter.

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 Pre-Submission 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 demonstrate that the number of monitoring stations is sufficient to ensure accurate monitoring of air pollution across Central Bedfordshire.

In our response to the last draft local Plan consultation we stated:

“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.”

16. Water Supply - Local Plan Policy CC6

The policies contained in s14 are not sound as they are not Positively Prepared, Justified, Effective, or Consistent with National Policy for the following reasons

Water Cycle Study

General Comment on Technical report

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
18 February 2018**