

CPRE Bedfordshire's response to Bedford Borough Council's (BBC's)

"Local Plan 2035 Draft Plan for Submission"

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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.

Introduction

The following are CPRE Bedfordshire's comments on Bedford Borough Council's Local Plan 2035 Draft Plan for submission. 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.

Bedford Borough has some beautiful countryside including the Bedfordshire Wolds and the River Great Ouse and its valley area.

It is our countryside and the "Quality of Life" enabled by it that attracts businesses and people to Bedford Borough and Bedfordshire as a whole.

Poorly planned and excessive development can rapidly destroy the very things that make Bedford Borough 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 maintain and enhance the very special character of Bedfordshire.

We have made extensive representations to BBC's previous Local Plan consultations and would wish to speak at the Local Plan Inspection in Public.

1. Legal Compliance

CPRE Bedfordshire is of the view that this Local Plan for submission is not legally compliant for the following reasons:

1.1. Inadequate Consultation

The consultation processes undertaken by Bedford Borough Council when preparing this Local Plan do not comply with the NPPF namely:

- **NPPF - Core Planning Principles para 17:**

*".....planning should:
Be genuinely plan-led, empowering local people to shape their surroundings....."*

- **NPPF - Local Plans para 155:**

"Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made."

At earlier stages of the Local Plan consultation process CPRE Bedfordshire raised the important issue of the large "democratic deficit" which has developed in local communities both urban and rural.

CPRE Bedfordshire remains very concerned over this "democratic deficit" with a very large number of residents still totally unaware of the Local Plan Consultation process.

Many communities no longer receive local newspapers directly delivered to their address particularly in rural areas 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, in hard copy format or online, the information they have presented regarding the consultation is limited.

There has been a real lack of BBC activity in ensuring that the local media (of all types) are regularly informed on the various Local Plan consultations and on the key planning policy issues that are being considered.

Only very limited advertising on the matter has been undertaken by BBC

Local Radio and TV have not chosen to encourage debate on the issues surrounding the Local Plan or to inform residents of the process.

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

Parish Councils have done their best to inform residents but there is a limit to what they can do and the coverage they are able to achieve.

BBC delivered just a handful of leaflets to Local Parish Councils in each phase of the Local Plan development and consultation process - sufficient only for the parish councillors themselves.

BBC should have recognised the causes of this “democratic deficit” and chosen a wider and more effective range of consultation methods.

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.

CPRE Bedfordshire provides the follow 2 examples to illustrate our further concerns regarding what we consider to be inadequate consultation procedures:

A. Major re-development in the Bedford Urban Area - Bedford Masterplan - part of the One Public Estate Programme. Local Plan Policies 8, 9, 10, 11, 12 & 13 refer.

A hugely important major urban regeneration programme covering the Bedford town area for approximately 1,900 new homes (25% of total additional 7,820 new homes called for in the Local Plan).

The Bedford Masterplan development initiative was consulted on from 4th - 31st October 2017 in parallel to the Local Plan development process **but not as part of it.**

This very important project which would impact on the lives of thousands of people living in the Bedford urban area was undertaken with hardly any publicity.

Very little effort was made to reach out to the residents of those local communities, which would be impacted directly and indirectly, for their views and opinions.

BBC made no mention that it was the intention for the Bedford Masterplan project to be incorporated into the Local Plan.

The result of this important public Consultation was that less than 400 individuals and organisations responded to it.

This is just 0.7% of the working population of the Bedford Urban Area (60,000) and just 0.4% of the total working age population of the whole Borough (100,000).

An appalling result for a Consultation on such an important development project which many residents would have a very keen interest in had they been made aware of it.

The Bedford Masterplan Urban Regeneration Programme was then inserted into this Local Plan 2035 for Submission with a 6 week Regulation 19, Consultation period - now extended.

No effort has been made since to contact the local residents of Bedford town who will be directly impacted by these development plans to advise them that they have been incorporated in the Local Plan 2035 for Submission or of the Local Plan Consultation process.

The whole consultation process undertaken by BBC and explained above does not comply with NPPF para's 17 and 155 in any way at all - "...early and meaningful engagement ..." it certainly is not.

B. Colworth/Sharnbrook New Town - Policy 27

Proposals for a New Town of at least 4,500 new homes, a new Rail Station and additional 7.5 Ha of employment adjacent to the village of Sharnbrook (1000 homes)

BBC advised residents in 2017 that they would be pausing the development of their Local Plan in order to assess the potential for the development of one or more of 4 New Towns that had been put forward by developers as potential sites for new homes.

These sites were: Lee Farm Sharnbrook, Thurleigh Airfield, Twinwoods near Milton Ernest and Wyboston.

The proposals were all made available in outline but not in detail for all to see on the BBC Local Plan website. No mention was made of a New Station at any site.

Suddenly, in January 2018 BBC announced that they had decided to rush through this "Local Plan 2035 for Submission" in order to get it ready for submission to the Ministry for Housing, Communities & Local Government by the end of the 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 they said, result in the number of houses that BBC would be required to build to be increased from BBC's housing estimate (SHMA) of 19,000 to around 25,000 over the Plan period to 2035.

At the same time they also announced that they had chosen Lee Farm, Sharnbrook (Colworth) as the site for a New Town and a New Parkway Station much to the surprise of the local residents of Sharnbrook and the villages of North Bedfordshire which would be most impacted by the BBC decision.

Since that time BBC has done very little to consult on these plans directly with the residents of Sharnbrook or the villages in north Bedfordshire apart from the meagre 6 weeks required under "Regulation 19" - since extended.
We are still unsure of the reason for the Consultation extension.

BBC have made no effort at all to go out to the residents of Sharnbrook or the villages to explain their decision and the detail of the proposed New Town and Rail Station, despite the fact that this development will become the largest community anywhere in the north of the Borough.

This is entirely unacceptable - as of today there are many residents of Sharnbrook and North Bedfordshire who know absolutely nothing about this very major development proposal which will impact very directly on the community of Sharnbrook, Souldrop and other villages in North Bedfordshire.

It will also impact on the residents of Bedford and those of Northamptonshire particularly the towns of the Rushden, Wellingborough, Kettering, Irthlingborough, Higham Ferrers conurbation.

As with A above, this consultation process does not conform to the requirements of the NPPF para 155 in any way at all.

As well as requiring “..early and meaningful engagement...” - para 155 states that: “....A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area,.....”

1.1.2 Impact of the “Oxford - Cambridge Corridor” on the consultation process

This Local Plan has been developed against the backdrop of the so-called “Oxford - Cambridge Growth Corridor” and what BBC see as the benefits accruing from proposals made by the National Infrastructure Commission (NIC) and being considered by Central Government, particularly those relating to a new East-West rail line and the Oxford - Cambridge “Expressway”.

It is clearly one of the key “drivers” behind this Local Plan and the fact that it could be reviewed quite soon after it has been approved. This to take account of NIC proposals which would include a further substantial increase in the number of new homes that would need to be built in Bedford Borough.

We are aware that The Mayor of BBC, Dave Hodgson 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 Bedford Borough nor been the subject of any public Consultation.

We believe that the action taken by The Mayor has pre-determined the outcome of key parts of this Local Plan.

1.1.3 A rushed Draft Local Plan for submission - East/West Rail

BBC have stated that they are rushing through this Draft Local Plan 2035 for Submission in order to get it ready for submission to the Ministry of Housing, Communities & Local Government by the end of March 2018 deadline.

The 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.

This means that BBC has rushed into ineffective consultations.

Furthermore, hugely important decisions regarding the final route of the Milton Keynes to Bedford part of East/West Rail, one of our area’s most important pieces of sustainable transport infrastructure in decades, which CPRE Bedfordshire fully supports, have yet to be finalised.

The exact location of the East/West Rail station at Bedford has still not been decided or at least, if it has, we are not being told.

The last thing anyone wants is a repeat of the Wixams (New Town) station fiasco which has still yet to be resolved.

Will there be a station at Wixams? - We still don't know and yet thousands more homes are planned to be built there over this Plan period.

These important decisions should themselves have been consulted upon and will impact directly and dramatically on this Draft local Plan for Submission.

1.2 Duty to Cooperate

We consider that the Plan is not legally compliant due to the Council not meeting the Duty to Cooperate guidance required by Government.

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:

1.2.1 Lack of evidence

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 BBC has been developing the Local Plan we have seen no Authority Monitoring Reports from BBC 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 BBC's Local Plan policies on DtC Partners
- The issues that DtC Partners would like BBC to take into account when developing policies
- Common regional issues that need to be taken into account in BBC's Local Plan

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

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

BBC 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 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 Bedfordshire.

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

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

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

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

SEMLEP is a DtC Partner with considerable influence in the region - their input into the BBC 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 BBC 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 this Local Plan.

2. Soundness

CPRE Bedfordshire believes that the Local Plan is unsound for the following reasons:

2.1 Local Plan - Chapters 3 & 4, Vision & Objectives **River Great Ouse & Valley Area**

Not consistent with national Policy

The Local Plan is not “consistent with national policy” in respect to its treatment of the River Great Ouse and Valley Area.

In particular NPPF para 157 bullet point 8 - it does not “contain a clear strategy for enhancing the natural environment”.

CPRE Bedfordshire is very concerned that insufficient emphasis in the Local Plan is given to highlighting the importance of the Great Ouse Valley both in terms of landscape, biodiversity and its intrinsic value.

Too often in the Local Plan, this great treasure of Bedford Borough’s environment (rural and urban), is mentioned simply as a means to achieving some sort of development or another e.g. Policy 45.

The protection and enhancement of the River Great Ouse and valley area is of such importance that it needs to be included as one of the “Visions” and “Objectives” of the Local Plan.

In CPRE Bedfordshire’s view it should be clearly, firmly and unambiguously stated that the protection of this important feature of the Borough’s landscape is one of the top priorities of Bedford Borough Council.

2.2 Local Plan Chapter 10 - Technical Paper 01 - Strategic Housing Market Assessment (SHMA) updated October 2016

Not positively prepared, justified or consistent with national policy

CPRE Bedfordshire does not agree with the SHMA estimate that 19,000 new homes are needed over the 20 year Plan period 2015 to 2035.

We do not believe that the estimate has been based on proportionate, robust and credible evidence.

We estimated that the real housing need is no more than 15,000 new homes - a considerable difference.

In our comments on the Objectively Assessed Need prepared for the Council by ORS as part of the Local Plan 2032 we stated:

“CPRE Bedfordshire believes that the 17,367 new homes proposed by the Borough Council over the 20 year period up to 2032 is highly excessive and unsustainable.

b). In order to achieve these inflated housing numbers the Council has persuaded the consultant that prepared the “Objectively Assessed Need for Bedford”, Opinion Research Services (ORS), that the official 2011 census understated the population of the Borough compared to the predicted population that was previously forecast by the Office of National Statistics (ONS). This has led ORS to increase the resident population by 4,000 people.

c). We do not agree with the analysis conducted by the Council and ORS that led to ORS increasing the Borough population. We believe that the difference pointed out by the Council is far more likely to be due to a range of other factors and primarily a mis-estimation of “International Migration”.

d). This highly unusual and, in our view, totally unjustified intervention by the Council led ORS to produce two different scenarios for housing (see figure 31, page 42 of their report).

The first scenario uses “Official Population Data” - this calculates the range in the number of new dwellings required as between 639 per year and 807 per year.

The second scenario uses the “Adjusted Population Data” which has increased the population by 4,000 people - this calculates the range of new dwellings required as between 768 per year and 889 per year.

The second scenario shows an average increase of 15% over the “Official Population Data” version.

ORS, presumably on instruction from the Council, has then gone on to use the higher of the two scenarios as the basis for achieving the final housing requirement of 17,367.

No final forecast of housing need has been calculated using the “Official Population Data” scenario.

However, other earlier work commissioned from a different company (Edge Analytics) by the Council and published in December 2013 entitled “Demographic Forecasts 2012-2032”, takes a completely different view recognising the well proven methodology of the census.

Edge Analytics recognise the difference between forecast population statistics and the actual official 2011 census population (see their Figure 5, para 2.8, page 8) but say that it is predominantly associated: “...with the mis-estimation of international migration....” (See para 2.10)

The report goes on to explain this in more detail on page 9 and ends by saying para 2.13: “..... The integration of the “other unattributable” element within international migration results in a relatively small impact of this component over the historical period.”

Edge Analytics then go on to produce their own starting point estimate of housing need of between 650 and 815 dwellings per year (see page 34, para 6.15 and Table 9 on page 33).

This is, amazingly, almost identical to the lowest range (i.e. the 1st scenario) in the ORS “Objectively Assessed Need for Bedford” and is wholly consistent with the assessment outlined above.

Removing the unreasonable and unnecessary assumption about incorrect census data reduces the housing need by over 3,400 houses”

2.2.1 - The 2016 SHMA repeats this unjustified increase in population stating that BBC considers the 2011 Census estimate of the population of the Borough to be inaccurate. This they say, is based on inconsistencies between the Census and the Council Tax register.

ORS has therefore increased the population in 2011 by around + 4,000 persons above that determined by the National Census.

By accepting this increase in 2011 they have then had to adjust the earlier population estimates and those for the entire 20 year period 2015 - 2035 by a massive +31,000 people.

CPRE Bedfordshire does not accept this increase in population and the reasons for it.

2.2.2 - The Office for National Statistics (ONS) which is responsible for all government statistics has conducted a number of studies to judge the robustness of the census methodology and its accuracy when measuring populations of small, medium sized and large communities.

In all cases it has found that the Census provides a remarkably accurate estimate of population.

In fact, when faced with disparities between the census data and other sources, the ONS defaults to the census in almost all cases.

With regard to differences with the Council Tax register the ONS makes the point that the Council Tax register is not always sensitive enough to accurately reflect demographic changes. Examples could be due to migrant populations or student accommodation to name just 2 etc. etc.

It is interesting to note that the highly respected East of England Forecasting Model is happy to use the official 2011 Census population data for Bedford Borough in their demographic statistics.

2.2.3 - 41% of 19,000 new homes are for people moving into the Borough from elsewhere in the UK

The SHMA calculation of 19,000 new houses is based on their estimate that a massive 41% (7,800) are for people that will migrate into the Borough from elsewhere in the UK.

We cannot find any justification for this extraordinarily high level of immigration anywhere in the Assessment or in Local Plan background papers other than the misplaced belief that it will generate economic growth.

CPRE Bedfordshire believes that it is completely unsustainable to encourage this level population growth in an area of the south east which already has serious problems with increasing house prices, high population density, saturated principal and rural road networks and rail infrastructure at peak times, water supply issues etc. etc. It is far better to plan for an industrial strategy which aims to spread housing growth more equitably throughout the UK.

The proposed housing numbers are far in excess of Local Need which is around 11,000 new homes.

CPRE Bedfordshire recognises the necessity to plan for some level of migration into the Borough but 41% is huge and quite unsustainable.
The evidence to support it does not withstand scrutiny.

2.2.4 - Employment Trends pages 100- 102

Generating unsustainable levels of outward commuting from Bedford Borough

This section of the SHMA states that 19,000 houses will generate in excess of 11,400 workers - para 5.43.

However, the paper notes that the highly respected East of England Forecasting Model produced by Cambridge Econometrics estimates that only 6,700 jobs will be created in the Borough.

This number of jobs will require only 5,500 workers due to “double jobbing”.

Therefore the 19,000 new houses will generate an additional 5,900 workers who will have to commute out of the area to places like Milton Keynes, London or Cambridge to find employment.

Encouraging this level of additional commuting is unsustainable when the local road and rail infrastructure is already struggling to cope at peak times.

As the Local Plan comments in the sustainability background papers, commuting is the least sustainable of all options in terms of planned housing growth.

2.2.5 - CPRE Bedfordshire’s calculations show that if the 2011 Census population data is used together with a realistic assessment of “Already Identified Housing numbers” then the total number of new homes needed in the Borough is around 15,000.

This will be more than sufficient to provide housing for “Local Need” and allow for a far more sustainable level of inward migration.

2.3 Local Plan policy 3S - Amount and distribution of housing development in Key Service Centres - Bromham, Clapham and Great Barford.

Not positively prepared, justified or consistent with national policy

CPRE Bedfordshire believes that 500 new homes for these villages is too high compared to the size of the communities themselves. In the case of Great Barford it would represent a +50% increase in the size of the village.

The decision on allocations has been made on the basis of the minimum numbers needed for a new school or new school year entry without any serious thought being given to the infrastructure issues that developments of this size will have - not only on the community itself but also on the surrounding villages and countryside.

We do not believe that the impact on the villages themselves or the surrounding villages and rural road network has been properly assessed and taken into consideration when making the decision.

2.4 Local Plan Policy 27 - Colworth/Sharnbrook New Town

Not positively prepared, justified, effective or consistent with national policy

The proposed Colworth/Sharnbrook New Town is an example of unsustainable development and as such is contrary to a number of policies within the NPPF. The NPPF (para 14) sees sustainable development as the “golden thread running through plan-making...”

CPRE Bedfordshire opposes the development of the New Town for the following reasons:

- **Unsustainable New Town location** - It will be built almost entirely on green countryside and farmland.
- **Adversely impact local countryside and important woodland areas.**
- **Massive addition to vehicle movements (car & commercial)** - In a rural environment an average of 1.5 to 2 cars per household can be expected so around 9,000 additional cars from the New Town.
- **New station - a new Parkway station with car parking spaces for up to 1,000 vehicles** planned - so an additional +2,000 daily vehicle movements (minimum) due to this facility alone.
- **Massive increase in traffic (car & commercial) on poor East/West rural road network**
Mostly quiet narrow rural roads through small, environmentally sensitive villages. Surrounding countryside some of the most “tranquil” in all Bedfordshire.

To the West & South/West vehicles (car & commercial) will go through the villages of Harrold, Odell, Poddington, Felmersham, Turvey, Carlton, Pavenham, Bromham, Oakley etc. with bridges liable to flooding during the winter closing roads. Hugely sensitive Great Ouse Valley.

To the East vehicles (car and commercial) movements will be through the tranquil villages of Knotting, Melchbourne, Upper Dean, Lower Dean, Riseley, Swineshead, Pertenhall, Thurleigh, Colmworth etc. in order to access the A1 and other routes.

- **Large increase in vehicle movements through Sharnbrook** itself with its very narrow High Street - it will be caught in the middle of a deluge of cars coming from all directions.
- **Traffic (car & commercial) will be further increased by the expansion of the “Colworth Science Park”** - additional +7.5 hectares or 20 acres of employment land e.g. offices etc.
- **Insufficient analysis of vehicle movement data by BBC** - poor quality data used by BBC to determine vehicle movement data - no data on commercial vehicle traffic - no analysis of impact on surrounding villages.

- **New Station (if required?) should be located near to Rushden** to benefit the Wellingborough/Rushden/Ilchester conurbation which has been identified by Northamptonshire as a “growth area” - not in the middle of the countryside.
- **Network Rail has not confirmed that a station will be located at the New Town**

The New Town & Station will also considerably increase the traffic (car & commercial) going into (and out of) Bedford via the A6.
It will therefore also cause increasing problems for Bedford itself.

BBC should look for alternative solutions which offer, amongst other things, hugely better East/West transport infrastructure and a location closer to the places people need to go to for work.

Other sites which may be more sustainable have been identified and put forward for development but BBC have decided not to incorporate them into this Local Plan.

2.5 Local Plan Policy 59S - Affordable Housing

Not justified

CPRE Bedfordshire supports that part of BBC’s Strategic Housing Market Assessment (SHMA) which 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.

The SHMA prepared for BBC also determines the need for social rented accommodation but BBC has declined to incorporate this element of affordable housing in the requirement.

CPRE Bedfordshire would like BBC to specify a minimum content of homes for social rent within the 30% requirement.

2.6 Local Plan - Section 8 Place Making - Policy 29S and other relevant policies. Para 8.13

Not positively prepared or justified

High quality new housing developments of all sizes and in all locations (urban and rural) are dependent on a commitment to incorporate high quality Open Spaces and Built Facilities that ensure the “Quality of Life” of residents.

Whether these are identified for sport and recreational use, or to enable increased biodiversity, or for use as allotments etc.

BBC has an “Open Space Supplementary Planning Document” (SPD) September 2013 which provides guidance on the amount of Open Space that should be included in all new housing developments depending on their size and population. BBC suggest that the Open Space SPD and the old Policy AD 28 will be carried forward.

Recent experience has shown however that not all recently completed housing developments conform to the guidance laid down in this document.

We therefore suggest that all Policies in the Local Plan covering specific housing developments should clearly state that developments will be expected to conform to the Open Space SPD as a minimum.

Furthermore, we would like to see a specific Policy in the Local Plan covering BBC’s commitment to the inclusion of high quality Open Spaces in all developments.

Urban Area Developments:

CPRE Bedfordshire is particularly concerned to ensure that the Open Space guidelines are fully adopted in all new housing developments proposed for the urban areas of Bedford identified in the Local Plan for regeneration.

It is essential that where high density housing is developed, a clear Open Space policy is closely followed to ensure residents “Quality of Life”.

It is important that developers should be made aware of the need to conform to BBC’s Open Space Policy and should design it into their plans from the outset.

2.7 Local Plan Policy 94S - Transport infrastructure and network improvements

Cycling - a North/South sustainable “Dutch Style” cycle path

Not positively prepared, justified, effective or consistent with national policy

Despite the importance given by government to the reduction of air pollution and the NPPF’s requirement (para 35) that the emphasis should be on sustainable modes of transport, not one of the key projects listed in policy 94S is a local sustainable transport initiative aimed at reducing car usage and air pollution.

CPRE Bedfordshire proposes a bold, key note cycling project - a new North/South “Dutch Style” cycle path.

The River Great Ouse as it passes through Bedford has provided our Borough with an amazing “natural” location for the East/West off-road, “Dutch Style” cycle path.

The route has recently been expanded by BBC to include the new housing developments to the west of the town in Biddenham, Great Denham and beyond.

This is excellent and the recently completed cycling/walking bridge as part of the Riverside North project has further improved the facilities for cyclists - connecting the East/West cycle path directly into the centre of Bedford Town.

All, of this will be a major benefit to the regeneration of the town centre.

Our successful neighbours Oxford and Cambridge have high levels of cycling.

If we wish Bedford Borough to become a modern, sustainable community, then we need to emulate this passion for cycling.

CPRE Bedfordshire believes that this should be a completely safe, off road/protected “Dutch Style” cycle path, stretching from Milton Ernest in the north to the Wixams New Town in the south through Bedford Town centre, by the most direct and fastest route possible.

We urge BBC, as we did at the last consultation, to include this project in their Local Plan 2035.

- It would reduce traffic and air pollution in Bedford
- Encourage families with children to visit the town centre and people in general to commute by bike for work and pleasure.
- The people of Bedford could cycle out into the countryside safely.
- It would improve the health of residents and support Carbon Reduction targets.
- It would encourage the development of more off-road/protected cycle routes.

Several sections of the North/South route are already in place - with “Dutch Style” cycle paths from Milton Ernest to Clapham and from Wixams to the edge of Bedford to name just 2 - they now need to be joined together to form a truly sustainable cycling corridor.

CPRE Bedfordshire

7 March 2018