

23rd August 2017

RESPONSE TO CENTRAL BEDFORDSHIRE COUNCIL'S DRAFT LOCAL PLAN CONSULTATION

CBC has for some weeks been consulting on the draft Local Plan, which sets out proposals for Strategic Growth Areas – **Arlesey being one of the key sites proposed for significant development.** The current consultation closes at 5pm on **Tuesday 29th August 2017.**

Arlesey Town Council (ATC) has reviewed the draft Local Plan and its supporting documents, which include 'Site Assessments', to form an opinion as to the soundness of CBC's proposals in meeting Government targets for housing numbers. This notice sets out the opinion formed by ATC, which has been submitted to CBC for due consideration.

Fundamentally, ATC considers there to be serious flaws in the process by which the sites have been proposed for development, which undermines the principles behind the draft plan itself. An overriding lack of consistent links between the site assessments and the site allocations proposed within draft Local Plan is evident, and it is the Town Council's opinion that Site NLP419 is neither sustainable nor warranted.

ATC's GENERAL COMMENTS ON THE DRAFT LOCAL PLAN

Housing Numbers

ATC fully understands the need for new housing; acknowledging that Government policy has put significant demands on all Local Planning Authorities to provide appropriate sites. However, the draft Local Plan put forward by CBC seeks to significantly exceed both the Strategic Housing Market Assessment (SHMA) and the Department for Communities and Local Government (DCLG) housing target set by the Government.

The headline figures of 20,000 to 30,000 new homes within the draft plan do not include the 23,000 houses that have already been allocated, including 1,400 as part of Arlesey Cross, which could mean that in excess of 50,000 homes may be built in Central Bedfordshire in the next 20 years, compared to the SHMA figure of 40,000 and the DCLG target of 35,000. While it is stated that not all sites will be brought forward, ATC believes that this potential level of over-allocation is both unnecessary and irresponsible, particularly given that the vast majority of new development will be on greenfield sites.

Employment

The plan states that a maximum of 30,000 new jobs will be created in Central Bedfordshire. CPRE Bedfordshire estimate that 40,000 new homes would create in excess of 50,000 new workers meaning that at least 20,000 additional workers would need to commute outside of the region. To encourage such levels of out-commuting is not sustainable.

The plan does not appear to include what would seem a sensible aim to reduce the levels of growth on the transport infrastructure by co-locating growth for housing and employment wherever possible.

Transport Infrastructure

The plan states that much of the development is dependent upon the delivery of significant improvements to the transport infrastructure, many of which may not be delivered within the timeline of the plan. A key element is the East-West Rail link which, based on current estimates will not start to operate trains until the mid-2030s, while there is currently no commitment from the Government to deliver what would be essential improvements to the A1.

While it may be prudent to plan development sites based on potential infrastructure improvements, this plan proposes significant numbers of new homes requiring essential infrastructure that may not be delivered within the life of the plan.

The approach to the A507 seems to be particularly strange. Major sites are proposed at both Henlow and Arlesey which would need significant investment in the A507, particularly given its current issues and the additional growth sites that are already in allocation (e.g. Arlesey Cross). Paragraph 5.2.1, however, uses the lack of capacity on the A507 as a reason NOT to site major growth areas in Area D. How can the lack of capacity be used as a reason for not developing one area and yet be discounted for another area which is equally as dependent on the road?

ATC believes that the A507 is a key element of the road infrastructure in Central Bedfordshire and is in dire need of an increase in capacity across its entire length which would also open up large areas for development that have currently been ignored.

Site Selection

Infrastructure

Paragraph 2.5.1 states that there is limited opportunity for growth in many places due to a lack of infrastructure and services, without providing any evidence, and yet sites which need significant infrastructure improvements are still included for potential allocation. There seems to be very little evidence to support the decisions that are being proposed.

Deliverability vs Viability

CBC's own site assessments (North Central Bedfordshire Growth Options Study) marks the sites at Tempsford (N10), East of Biggleswade (N17), Henlow Airfield (N25) and East of Arlesey (N29) as "Low" on a measure of deliverability but "High" on a measure of viability. All four of these sites have been singled out as strategic options in the draft plan which suggests that CBC is prioritising profit for landowners (which include CBC) and developers over the deliverability of the site. All four are regarded ranked as "Low" due to the assessment that the required infrastructure is unlikely to be delivered within the life of the plan and yet all have been included as strategic sites in spite of this key flaw in their suitability.

Size

Paragraph 8.4.3 states that "*evidence has shown that the development of large scale new communities....will be the most sustainable option*" but provides nothing to back up that statement.

Coalescence and Agricultural Land

Policy SP4 on Coalescence and Policy DC6 on Agricultural Land are unacceptable in that specific proposals in the Local Plan are excluded from the terms of these policies. These factors should always carry significant weight in the assessment of all sites proposed for development.

Community Infrastructure Levy (CIL)

CIL should have been implemented in 2015 but it has been put on hold in Central Bedfordshire pending the drafting of the Local Plan. The plan makes no mention of CBC's plans to implement the CIL and its omission from the draft plan is a significant oversight.

ATC's COMMENTS ON LOCAL CONSIDERATIONS

Overview

ATC is deeply concerned about the level of additional development that the draft Local Plan proposes for Arlesey. When the existing proposed increase in housing of 1,400 is taken into consideration, this plan would mean that Arlesey would double in size in the next 20 years. While it is true that every area in Central Bedfordshire should expect its fair share of additional housing, a near 100% increase in the number of houses is proposed for no other settlement in the region and ATC believes that Arlesey has been unfairly targeted.

Housing Numbers

A Housing Needs Survey that was carried out as part of the Arlesey Neighbourhood Plan project determined that local housing needs would be more than satisfied by the Arlesey Cross development. An increase from approximately 2,600 dwellings to around 4,000 that will be delivered by Arlesey Cross represents a 54% increase which should certainly more than satisfy Arlesey's "fair share" of development for the coming 20 years. The proposal for a further 2,000 houses represents significant over-development and will certainly change the character of the area that the draft local plan proports to protect.

Crucially, the responses to question 21 on the individual site assessments for all Arlesey sites to assess the cumulative impact of development do not include the increase to housing numbers proposed for Arlesey Cross – had they done so, every site in Arlesey would have been marked "red" in this category.

Transport Infrastructure

Development of the A1 corridor is described in the plan as being dependent on significant infrastructure improvements, none of which are guaranteed to be delivered. Developments already agreed, including Arlesey Cross, will severely test the capacity of the A507 beyond the existing issues at peak times, but there are no firm plans to improve the road. Additional development on the proposed East of Arlesey and Henlow Airfield sites would further exacerbate this issue and the Local Plan needs to make it clear that such development would be unsuitable without significant improvements to this key artery.

Furthermore, Arlesey station is already in need of significant infrastructure improvements, some of which *may* be delivered as part of the Arlesey Cross developments, but as the local station not only for Arlesey but also Henlow, the Local Plan must include clear commitments on how the station would be improved for both access, capacity and links to the bus network which are currently non-existent at commuter times. Indeed, it could be argued that the scale of development proposed would warrant the re-opening of a station on the site of the Three Counties Station which could alleviate the inevitable capacity issues at Arlesey should the proposed development take place.

Site NLP419 Assessment

The “East of Arlesey” Growth Location is presumed to be the site designated NLP419. The Stage 2 Suitability Assessment provides in inordinate number of “red”, “amber” and “no” responses (17 of the 27 questions that have been considered) which raises questions as to the basis on which the site was deemed suitable.

The detailed site assessments for each landowner parcel (Site Assessment Forms) reach contradictory conclusions to those contained within the North Central Bedfordshire Growth Options Study. For example, site NLP419 forms almost all of the area contained within the N29 Growth Options site with the former being marked as “amber” for viability and the latter as “high”, which would presumably equate to “green”.

Furthermore, the detailed site assessment of NLP419 suggests that the site capacity is 1,500 dwellings but the Local Plan is suggesting that this site would produce 2,000 additional homes. There also seems to be confusion over whether this site is considered “self-contained” or an extension to Arlesey. As an extension to Arlesey, 2,000 homes represents an increase of 75% in the current number of homes in the town, or 50% when the plans for Arlesey Cross are included – both of these are well above the 25% limit referred to in question 20 of the assessment form.

Such inconsistencies suggest that these assessments have not been conducted in a thorough and coordinated manner and it is difficult to understand how these assessments support the decision to include or exclude a specific site. That, in itself, suggests that some other undocumented decision-making process has been used.

Ends.

Further information:

Consultation representations **may be submitted in writing** to Central Bedfordshire Council:

Local Plan
Central Bedfordshire Council
Priory House
Monks Walk
Chicksands
Shefford
SG17 5TQ

Or by registering online at: <https://centralbedfordshire.jdi-consult.net/localplan/> and completing either the ‘General Comments’ section or any of the relevant sub-sections.

Guidance on submitting comments online is available on ATC’s website using the following link:
<http://www.arleseytc.co.uk/wp-content/uploads/2017/07/ATC-Guide-to-submitting-Local-Plan-Reps-July-2017.pdf>

Please direct any queries regarding this or any other Town Council matter to our Town Clerk, Susan Foulkes, either by email: townclerk@arleseytc.co.uk by telephone 01462 733722 or in writing to the Town Council Office, Arlesey Community Centre, High Street, Arlesey SG15 6SN