

EAST OF ENGLAND PLAN > 2031: SCENARIOS FOR HOUSING AND ECONOMIC GROWTH: CONSULTATION SEPTEMBER 2009 Deadline for responses 23 November

Introductory

The East of England Regional Assembly is conducting a Review of its regional strategy, which was published as the East of England Plan in May 2008, and which currently covers the period 2001 - 2021. The Review will extend the Plan until 2031. The current Review is a partial Review, focussing on certain aspects of the Plan. The government has asked for this Review and provided housing advice with the aim of getting the Region to boost its building rate for new homes.

The Region's existing strategy concentrates most growth in or around the larger towns and cities in the Region, using urban land where possible, but with exceptions on the edges of some towns, including some releases of Green Belt land. A great deal of work was done to try to test the implications of the planned growth for the local economy, the environment, infrastructure requirements, resource consumption and all aspects of sustainability.

The government asked the Regional Assembly to test the implications of further growth in the region of a range from 30,000 new homes per annum to 40,000. This compares with about 26,000 in the current plan and past delivery of only 22,000.

The Region Assembly is holding a consultation, which ends at 5.00pm on Tuesday, November 24, 2009, on four different possible growth scenarios for housing and the regional economy. The Region has asked eight specific questions and urged people to respond on line if possible. However, we "are welcome to make comments on any aspect of the document" and not everyone finds the on line method accessible or convenient.

The Regional Assembly considers that its existing targets for homes and jobs are already challenging, with a 10% increase in population and a 20% increase in both households and jobs. It has already decided that it would not be appropriate to test the highest levels now proposed by the government. It believes such levels would compromise all its attempts to ensure that growth takes place in a sustainable way, adding that such growth " would rely on large scale in-migration and jobs growth way beyond the most optimistic projections."

The consultation document and the associated sub-Area Profiles, which can be found on-line, give further information about expected population and economic changes and the basis on which the calculations are done. Within the Region, the consultation document points out that most of the growth forecast is due to migration into the region from elsewhere in the UK or from overseas.

If present trends continue, Bedford Borough's population will grow faster than the regional average, increasing by 44,000 by 2031 over 2006, i.e. 28%. 17,000 of the increase would be the result of "natural change" (more births than deaths), and 27,000 due to people moving into the area.

However, the Sub-Area study for Central Bedfordshire and Luton points out that although the population growth is broadly similar to the regional average, in this instance, unlike the regional average, the increase is dominated by natural change: "This is more certain to occur than migration and is likely to be due to the sub-area's relatively young population."

This is 109,000 or 25% more people than in 2006. Of this change some 88,000 is due to natural change (more births than deaths), and some 22,000 is due to people moving into the area.

The Four Detailed Growth Scenarios in Bedfordshire – new dwelling totals

	Scenario 1		Scenario 2		Scenario 3		Scenario 4	
	2011-2031	2011-2031	2011-2031	2011-2031	2011-2031	2011-2031	2011-2031	2011-2031
	Annual average	20 year target	Annual average	20 year target	Annual average	20 year target	Annual average	20 year target
Bedford	970	19,400	970	19,400	970	19,400	1,100	22,000
Central Bedfordshire	2,120	42,400	2,770	55,400	2,120	42,400	1,750	35,000
Former Mid Beds		14,400		27,400		14,400		23,000
Former South Beds		28,000		28,000		28,000		12,000
Luton *	140	2,840	240	4,840	140	2,840	700	14,000
Total	3,230	64,640	3980	79,640	3,230	64,640	3,550	71,000

*Luton has a tightly drawn boundary so part of the growth indicated may need to occur in surrounding areas (subject to an assessment of land availability etc, which might show more or less potential in Luton)

References are all available on-line

11-page summary of the Plan Review:

<http://www.eera.gov.uk/GetAsset.aspx?id=fAAzADIANQAxAHwAfABGAGEAbABzAGUAFAB8ADAAfAA1>.

Full consultation document (40 pages): <http://eera-consult.limehouse.co.uk/file/916832>.

Interim Sustainability Appraisal (97 pages): <http://eera-consult.limehouse.co.uk/file/916944>.

Sub-Area Profiles: <http://www.eera.gov.uk/What-we-do/developing-regional-strategies/east-of-england-plan/east-of-england-plan-review-to-2031/east-of-england-plan---2031-sub-area-profiles/>.

We would particularly recommend reading these – there is one for Bedford and one for Central Bedfordshire and Luton

Review Project Plan: <http://www.eera.gov.uk/What-we-do/developing-regional-strategies/east-of-england-plan/east-of-england-plan-review-to-2031/east-of-england-plan-review-to-2031-inception-stage/>.

Strategic Advice to EERA from s.4(4) Authorities:

<http://www.eera.gov.uk/What-we-do/developing-regional-strategies/east-of-england-plan/east-of-england-plan-review-to-2031/east-of-england-plan-review-to-2031-strategic-advice/>.

‘Call for Proposals’ (list of strategic development sites put forward by developers):

<http://www.eera.gov.uk/What-we-do/developing-regional-strategies/east-of-england-plan/east-of-england-plan-review-to-2031/east-of-england-plan-review-to-2031-call-for-proposals/>.

Scenario 1: Roll forward of the existing Plan This is broadly based on the views of local councils, most of whom indicated that this was the highest level of development that they could support as being deliverable. Some felt even this might not be deliverable, although a few indicated some possibility of further growth.

As far as Bedfordshire is concerned, CPRE would say that this is the upper limit of what can be accommodated in a sustainable way. Indeed we see strong arguments for revising the targets downwards, because of the current economic situation. This could have been the basis for another Scenario.

We would agree with EERA that the existing plan was challenging enough and had thrown up many concerns about whether all the necessary infra-structure could be paid for and delivered.

We had many concerns over the delivery of sufficient jobs. These concerns have only been exacerbated by the current recession. Unbalanced growth which risks damaging the very qualities that currently make the region attractive to incomers would be an appalling legacy to future generations.

We noted that the original expansion study carried out (by consultants Entec) for the Bedford area, as part of the background study for the Milton Keynes and South Midlands Sub-Regional Growth Strategy, found that growth had to be constrained because of the difficulty of ensuring that sufficient jobs for the new residents could be generated.

Any shortfall in jobs would promote increased and unsustainable levels of commuting. Reducing the need to travel is a key component of addressing future shortages of energy, tackling climate change and protecting the environment from the deleterious consequences of ever more roads.

We would have concerns about undue reliance on growth at Luton airport as a source of jobs, given the question marks over the sustainability of this mode of travel.

The growth planned for Luton impacts on the South Bedfordshire Green Belt and/ or on a part of Hertfordshire. We do not believe that the problems thrown up by this planned expansion can be solved without lasting harm to the countryside. Compensatory Green Belt was promised by John Prescott, when, as Deputy Prime Minister, he started the whole expansion programme and CPRE is glad to see that the Sub Area Profile refers to this.

Expansion of Milton Keynes into Bedfordshire as part of a new South Eastern sector of the city, needs to be included in these Bedfordshire housing totals. Milton Keynes' growth has been planned for by another Region, the South East, in its South East Plan and CPRE has been totally opposed to this anomalous process. The South East Plan (May 2009) said that up to 5600 homes adjacent to Milton Keynes in the former Mid Bedfordshire council area, should be tested. The developers would like to see as many as 7000 new dwellings here, while Central Bedfordshire has agreed to 2000 and signed a memorandum of understanding with Milton Keynes Council to that effect. The Review has been asked to address this issue and the Sub Area Profile refers to it.

Scenario 2

This and Scenario 3 test the lower end of the enhanced rate of housing delivery the government would like to see: some 30.000 a year.

Scenario 2 draws on a study carried out by Arup for the Regional Assembly, which sought to determine where new settlements could best be accommodated in the region.

The study was not actively promoting any such new settlement; its brief was to find locations, if it were to be decided that new settlements were the best way forward. The study was lukewarm about the idea and, although it suggested that sites in Bedfordshire might be suitable, it was very guarded about this. Nevertheless, the study did suggest that a settlement of at least 20,000 homes might be located at one of three places in Bedfordshire: the A5120/Midland Main Line Corridor, the East Bedfordshire Strategic Corridor and the Marston Vale.

The reason for Arup's reluctance was Bedfordshire's historic and continuing difficulty in generating jobs. It was feared that a new settlement would jeopardise the successful regeneration of Bedford and the planned expansion of Milton Keynes.

CPRE Bedfordshire thinks that all of these settlement locations should be dismissed for the very convincing reasons given in the Arup Study.

The Marston Vale was of course a location for an eco-town, although the proposal was withdrawn. The Arup study puts its finger on why it was and is a totally unsuitable site.

All three sites raise the possibility of settlements merging and losing their identity and sense of place. In the case of Marston Vale, there is a real risk of Milton Keynes and Bedford coalescing to become a new and straggling linear city.

The Arup study, which is very well worth reading, contains an interesting discussion of twentieth century city expansion theories, some of which might be used to encourage such an outcome. In the "zero-sum" game between town and countryside, we believe that the need to encourage sustainability, through fulfilling needs locally wherever possible, for instance through promoting local food, local energy sourcing, the provision of local green infrastructure etc shows that the drive towards ever greater urbanisation needs urgent reassessment.

For Bedford, the figures for Scenario 2 are the same as Scenario 1.

For Luton, the figures for Scenario 2 are increased to take into account Luton Council's having identified that there might be some additional potential (subject to infrastructure provision) that could raise its growth by 2000 dwellings. These additional dwellings are needed in this Scenario to reach the Government's housing range,

Scenario 3

This scenario is based on the same rate of housing delivery as Scenario 2, but the distribution of the growth is determined by where there is the greatest potential for generating jobs.

For Bedfordshire, Scenario 3 is unchanged from Scenario 1 as, "although economic projections suggest a total of 18,000 fewer houses would be needed in the sub-area, it is assumed for the purposes of this scenario that, as this is a regeneration area, interventions would be made to increase its economic performance."

This surely illustrates yet again, the difficulty of generating jobs in our county and the dangers of cramming it with housing.

Scenario 4

Scenario 4 shows the number of dwellings that would be required if past demographic trends, including migration patterns, continue.

Under this scenario, the growth rate for Central Bedfordshire falls, because of a much lower growth rate in the former South Bedfordshire, while that of the former Mid Bedfordshire rises; but that for Bedford and Luton rises, and, in the case of Luton, dramatically so, reflecting its rising population independent of population movements.

However, this seems a distorted scenario, at least in part, since population shifts are determined by individual choices that are sensitive to changes in the underlying situation caused by economic factors and by policy interventions. The coming years seem most unlikely to be free of these. The Assembly recognises the weakness of projecting these trends, but rightly worries that figures based on them are the ones that have been used by independent panels examining Regional Plans in the past.

In general this scenario increases movements into more rural parts of the Region including rural parts of Bedfordshire and so seems likely to increase commuting to jobs and services, which is contrary to the spatial strategy underlying the existing Plan.

Conclusions

The consultation document tries to judge the effects of the scenarios on many of the criteria which were considered in the original spatial strategy.

CPRE Bedfordshire is particularly concerned about the impact of development on the AONB near Luton, where development may affect its setting, and about urban fringe landscapes in the vicinity of Bedford and Milton Keynes.

We also have concerns about the impact of dispersed development under Scenario 4 in on historic our market towns and villages.

Scenarios 2 and 4 would have the biggest and potentially most detrimental effects on the environment in Bedfordshire. Scenario 2 would bring an unsustainable new settlement and Scenario 4 a great deal of new development in rural areas, which could lead to increased urbanisation of the countryside and more and more car journeys, at a time when it is more and more imperative to cut down.

Although it is difficult to pinpoint precise effects in some of the categories that EERA considers, it is clear that the government's drive for more and more housing puts at risk the careful juggling of checks and balances in order to maintain sustainability that the East of England Plan was trying to achieve. While we agree that there is a shortage of affordable housing and homes for local people in villages, we would wish to see these problems tackled by targeted policies, rather than by upping the rates of development across the board.

Scenario 1 is the only one that should be given serious consideration. In the light of current conditions, even this should be made subject to a new reality check.

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