



**BEDFORDSHIRE
RURAL AFFAIRS FORUM**

The Barn • Buttercup Farm
Hockliffe Road • Tebworth
Bedfordshire LU7 9QA

Tel: 01525 878149
Fax: 01525 877224
email: braf@bedsrcc.org.uk

Sustainable Communities Team
Government Office for the East Midlands
Belgrave Centre
Stanley Place
Talbot Street
Nottingham
NG1 5GG

23 December 2004

Dear Sir/Madam

Milton Keynes and South Midlands Sub-Regional Strategy – Secretary of State’s proposed changes

1. I am responding on behalf of the Bedfordshire Rural Affairs Forum (BRAAF). BRAAF has over 30 organisations within its membership, and a current list of members is annexed to this response. Its members include representatives from a range of sectors across the rural economy including health organisations, environmental groups, local authorities, rural development groups, farming interests, business interests and education and skills groups. BRAAF seeks to address rural service provision, social exclusion, and the economic and environmental needs of rural Bedfordshire. It is supported by funding provided by the East of England Development Agency, channelled through the Bedfordshire and Luton Economic Development Partnership.

General

2. The level of housing development proposed will have a significant impact on rural Bedfordshire, which will come under pressure from three of the six growth areas i.e. Bedford/Kempston/Marston Vale, Luton-Dunstable-Houghton Regis, and Milton Keynes. The proposed changes to the strategy have done little to address the issues which we raised to the initial consultation and still do not give consideration to the impact which the growth will have on our rural communities and countryside. BRAAF is concerned that the level of growth cannot be delivered in a sustainable way, does not address local needs, and will over-develop and damage the county. The increase in levels of housing in the

south of the county and inclusion of Leighton Linlade increase the concern about the environmental impact of the strategy.

3. BRAF is concerned that the needs of the growth towns are being isolated from the needs of existing communities rather than working towards a holistic and sustainable vision for the sub-area as a whole.

4. There is a need to consider particular issues for the urban/rural fringe, but also the impact on the wider rural areas:

- potential blight from noise, pollution, lighting from roads affecting countryside and villages
- the “sense of place” of villages which are vulnerable to losing their identities as they are “swallowed up” by expansion of urban areas
- the extent to which economic development of Bedford and Luton may impact on rural economic development, particularly against the background of the changing role of agriculture and the nature of rural land use
- the impact of the recreational needs of expanded populations of Bedford, Luton and Milton Keynes upon rural areas, and the increased number of visitors to the county that improved road and rail links can bring. There is great potential for the environment of rural Bedfordshire to contribute to the economy, for example through rural tourism initiatives. So there are welcome opportunities for diversification, rural entrepreneurship, leisure and tourism – indeed, the creation of new jobs in rural areas is a key challenge for rural Bedfordshire. But increased visitors also bring potential problems e.g. the maintenance and protection of the countryside, and the preservation of the tranquillity of country lanes.
- the impact of improved accessibility to and from rural areas. There is potential for increased traffic movements between rural and urban areas e.g. from urban to rural for leisure activities, as above, or from rural to urban to take advantage of new jobs – especially if employment land is on the periphery of Bedford and Luton/Dunstable/Houghton Regis.
- there may be an acceleration in villages and small towns becoming “dormitory villages”.
- the detrimental impact on services in rural areas unless there is a step change in infrastructure (transport, social and green) as well as housing growth.
- there may be benefits for rural communities from housing growth (e.g. bigger school intakes may keep smaller local schools open, better bus services may be provided, better access to services) if development takes place in a sustainable way, but not if it takes place in an ad hoc piecemeal way with little long term thought being given to the “non growth” areas.

5. For this reason, BRAF would urge the addition of an objective on page 9, paragraph 14 aimed at ensuring that plans for growth take due regard of the wider countryside and urban and rural communities not specifically targeted in the strategy. Similarly we request an addition to the bullet points of “Strategic Policy 3: Sustainable Communities” on page 16 emphasising the need to integrate the new communities with existing urban and rural neighbours.

6. BRAF regrets the apparent weakening of the acknowledgement in the 2003 version of the draft strategy that if the appropriate level of infrastructure investment and job creation cannot be achieved, then the level of proposed housing growth will have to be scaled back. Although it is proposed to monitor the growth of jobs, there is no mechanism set out for adjusting the rate of housing growth. There is little confidence in the provision of adequate resources for the accompanying infrastructure or that any necessary scaling back of housing will be delivered in practice.

Jobs

7. The number of jobs proposed for Luton and South Bedfordshire has not been changed by the Secretary of State despite the increase in the number of dwellings. The ratio of jobs to dwellings is far too low. Inevitably, this will lead to the new residents adding to the number of commuters on already congested road and rail routes, and certainly not to the economic regeneration of the area. The Bedfordshire and Luton Economic Development Partnership has carried out a detailed analysis to arrive at jobs targets and BRAF would urge that the Partnerships submission be given full consideration and taken on board.

Transport

8. Whilst the document expresses a commitment to promote sustainable transport, it fails to deliver and in some respects is weaker than the original consultation draft, e.g. failure to even commit to East West Rail, let alone provide funding. In addition the proposed new MML station north of Luton/Dunstable has been deleted. It is clear that road transport is being given priority over public transport and this is a major flaw.

Environment and “green infrastructure”

9. BRAF is extremely concerned that there should be rigorous consideration and commitment given to the protection, and indeed enhancement, of the countryside, natural and historic assets of the county. There are some positive changes to the document, in particular:

- Specific commitment to high standards of design and sustainable construction;
- Specific requirement for appropriate “Green Infrastructure” is now included,

although it is noted that there is no specific reference to Green Infrastructure in relation to Luton/Dunstable/Houghton Regis.

10. However, the emphasis appears very much to be on urban areas and not on protection of the wider countryside, landscape character and biodiversity. The countryside is not just a “multi-function green space” (paragraph 52).

11. In relation to the proposal on page 22 to review the green belt boundaries around Luton/Dunstable/Houghton Regis, there must also be consideration of wider environmental constraints such as the AONB and the protection of village character.

Social infrastructure

12. It is critical that the social infrastructure expands in pace with housing expansion. This does not just mean schools and hospitals, but also “hidden” services like social services. Deficits in social infrastructure generally affect rural areas more severely than urban areas because service providers tend to focus more on urban areas in the first place, and also there are generally fewer outlets servicing rural people and businesses, resulting in poorer access to services in rural areas.

13. There also needs to be investment in community development and the role of the voluntary and community sector in integrating the new communities with existing rural communities in the Marston Vale, around Luton/Dunstable/Houghton Regis, and potentially the areas in Mid Bedfordshire which are vulnerable to the expansion eastwards of Milton Keynes.

Affordable Housing

14. There is no target for affordable housing. This needs to be addressed. There are issues of affordable housing for rural areas too, and how affordable housing will be maintained in villages most directly affected by the growth areas. This has a bearing on the issue of preserving and promoting sustainable communities in the smaller rural villages and parishes where house costs may be prohibitive for local people. BRAF would be concerned if preference was given to funding for affordable housing in the growth areas at the expense of affordable housing elsewhere in the county.

Delivery

15. Community consultation will be critical. This must not just encompass urban areas. BRAF urges that full use should be made of existing organisations, including in the voluntary and community sector, that work closely with communities and who can act as conduits for consulting communities. Proper consultation takes time and this needs to be built in to the timescales for implementation.

16. I hope these comments are helpful. They broadly represent the views and opinions expressed by Forum members, and are not intended substitute for, or prejudice, any specific comments or representations that Forum members may make on behalf of their own organisations.

Yours faithfully,

Jane Markham
BRAf Coordinator

Bedfordshire Rural Affairs Forum: Current Membership

- Agricultural Development in the Eastern Region, Shuttleworth College
- Bedford Borough Council
- Bedfordshire Association of Town and Parish Councils
- Bedfordshire and Cambridgeshire Rural Support Group
- Bedfordshire County Training Ltd
- Bedfordshire Rural Communities Charity
- Bedfordshire County Council
- Bedfordshire Heartlands Primary Care Trust
- Bedford Primary Care Trust
- Bedfordshire Wildlife Trust
- Bell Consultancy
- BTCV
- Church of England
- Countryside Agency
- Campaign to Protect Rural England
- East of England Development Agency
- Farming & Wildlife Advisory Group
- GO-East/DEFRA
- Greensand Trust
- Ivel and Ouse Countryside Project
- Landscape 2000
- Learning and Skills Council – Bedfordshire and Luton
- Marston Vale Trust
- Mid Bedfordshire District Council
- Mid Bedfordshire Council for Voluntary Service
- National Federation of Womens Institutes
- North Bedfordshire Council for Voluntary Service
- North Chilterns Trust
- National Farmers Union
- Voluntary and Community Action South Bedfordshire
- South Bedfordshire District Council
- Sport England
- Wildlife Trust