

EAST OF ENGLAND PLAN: COMMENTS FROM BEDFORDSHIRE RURAL AFFAIRS FORUM

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I am responding on behalf of the Bedfordshire Rural Affairs Forum (BRAFF). BRAFF 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. BRAFF 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.

These comments are not intended substitute for, or prejudice, any specific comments or representations that Forum members may make on behalf of their own organisations.

General

There are many laudable aspirations in the plan, and BRAFF welcomes the inclusion of the aim of “supporting the economic and social well-being of rural villages and the countryside by improving access to employment, services and facilities, allowing for further provision of affordable housing and encouraging economic diversification.” However, there are concerns that social and environmental impacts should not play second fiddle to the economic drivers.

The rate of house-building, transport and other infrastructure development and job creation need to be in step. The “plan, monitor, manage” approach has to be effective if this is to be achieved. There is little confidence in the provision of adequate resources for the accompanying infrastructure, and it is not clear how any necessary scaling back of housing will be delivered in practice.

It is critical that the social infrastructure also 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.

Policy SS9, E2, Sub-regional policies for Bedfordshire & Luton

The two sub-regional policies address Luton Airport and waste management. Policies for other areas have much wider scope, and many include references to social inclusion in rural communities, ensuring rural regeneration, green belt issues, the need for networks of green space, protection for small towns and villages from unsympathetic or inappropriate development. Bedfordshire is rural for a great part of its geography and the rural areas

are facing immense pressure from the MKSM growth area and the ‘residual’ development set out in the RSS.

For sustainable development, opportunities need to be created in both urban and rural areas or the latter will be at risk of progressive economic under-development. Rural entrepreneurship, including diversification, is particularly important in the light of reform of agriculture policy and the fact that agriculture is no longer the main economic activity in rural areas. We support the development of sustainable rural businesses and role of planning authorities in the identification of suitable sites, provision of new buildings and re-use of existing buildings subject to these being of an appropriate scale and character and not to the detriment of sustainable communities in rural towns and villages.

There is a danger that planning for rural areas will fall in the cracks between the MKSM Strategy, Regional Spatial Strategy, and Local Development Documents (LDDs). BRAF considers it is essential that the strategy provides a steer for the relevant LDDs to set out a clear rural strategy and rural development policy. The issues facing Bedfordshire may be different to those in some of the other counties in the region. Specific action will be needed to make sure that rural areas can benefit from the opportunities arising from the growth agenda so that the shift to villages and small towns becoming “dormitory villages” of expensive housing is not accelerated.

Housing - H1

The level of housing development proposed will have a significant impact on rural Bedfordshire, which will already come under pressure from three of the six growth areas i.e. Bedford/Kempston/Marston Vale, Luton-Dunstable-Houghton Regis, and Milton Keynes. The rate of housebuilding, transport and other infrastructure development and job creation need to be in step. The “plan, monitor, manage” approach has to be effective if this is to be achieved.

It is strongly recommended that Local Development Documents will need to make linkages with Community Strategies and housing needs surveys where they exist. Parish Plans and Village Design Statements may also play a role in augmenting local plans. There also need to be links to biodiversity action plans. It is also recommended that this policy could usefully be strengthened by taking this opportunity to specifically point local authorities in the direction of Rural Communities Councils in terms of carrying out parish plans and local housing needs surveys. There perhaps also needs to be a special mention of the housing enabler programme and the Countryside Agency’s Vital Villages schemes which can provide information on needs identified by consultation within rural communities.

Housing – H2

Affordable housing is major concern in rural Bedfordshire, including how affordable housing will be maintained in villages most directly affected by the growth areas. This has a bearing on the issue of maintaining and promoting sustainable communities in the smaller rural villages and parishes where house costs may be prohibitive for local people.

We welcome the reference to exception sites in rural areas. One significant difficulty has been that land has failed to come forward at anything like sufficient speed. Part of the delay is due to the lack of clarity about what exception sites mean. It is natural for the owner of such land to immediately think that if he/she has got as far as having their land recognized as having some housing potential as an exception site then just a few years more waiting will give them land for "proper" housing. Sufficient land will not be made available unless land owners really understand that there's no windfall around the corner and that their best option is to take the reduced value on offer for affordable housing. It is therefore recommended that RSS makes it clearer to local planning authorities that they need to communicate more forcibly that exception sites are exactly that - exceptions - and no amount of waiting is going to change that. This message needs to go out strongly to rural landowners and Parish Councils - and indeed other agencies. In addition, Local Planning Authorities/Housing Authorities have compulsory purchase powers and they should be reminded to use them to get identified exception sites built on. In summary, local planning authorities need to be pushed to form a more forceful, coordinated - joined up thinking - policy about these sites which is communicated in a focussed way to actually get them built on not just sat on.

Policy T1 Transport

Whilst the document expresses a commitment to promote sustainable transport, it appears that road transport is being given priority over public transport. There is lack of emphasis or longer term strategy for rail transport.

Environment policies

BRAF is very 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. Issues of open space and countryside, biodiversity, landscape character are not adequately addressed in the strategy, although these are key for sustainability.

Water: Building on flood plains will lead to floods in the winter and drought in the summer. Sustainable urban drainage systems have to be incorporated. The policies on flood-plain development and climate change are weak.

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