

CENTRAL BEDFORDSHIRE PRE-SUBMISSION LOCAL PLAN 2018

OBJECTION BY P. CARTER TO OVERALL PLAN PRESENTATION

1.0 Introduction

1.1 This representation relates to

- a) the failure to write in Plain English,
- b) the frequent use of jargon
- c) frequent use of unsubstantiated statements
- e) presenting fundamental courses of action as a fait accompli.

all of the above resulting in a document in which many parts are misunderstood or incomprehensible to the lay public.

The impression is of a document, hastily prepared under diverse authorship, with no overall editorial control. As a legal document within the planning framework, it leaves much to be desired.

f) The need to follow a 'tick box' regime of submitting online representations. This fragments general observations and does not offer the opportunity to comment other than in the direction steered by the Council. It could also imply that failure to tick a box (comment) signifies acceptance of a section. This is not necessarily so, merely that the representation is concentrating on key matters rather than nit-picking. It has to my knowledge intimidated members of the public and has deterred the making of representations.

1.2 The Government encourages all departments and local government to produce publications which conform to the basic standards of plain English. The *Plain English Campaign* instituted the Crystal Mark logo in 1990 which is awarded to, and displayed on, documents that are as clear and readable as possible. Almost all government departments have used the logo, and Central Bedfordshire Council is listed amongst their users. (<http://www.plainenglish.co.uk/services/crystal-mark/crystal-mark-holders.html>)

1.3 However, the Council appears to have cast aside this high standard. In answer to an access to information request, the Council stated it is not in any way supportive of the Plain English Campaign. (Reply at **Appendix A**)

2.0 EXAMPLES (just a few of many)

2.1 *"1.2.7 In order to exploit the wider opportunities in the Corridor highlighted in the National Infrastructure Commission Report, the Council is actively leading and driving forward a co-ordinated approach to enhanced growth within the central area of the Corridor and is leading on the identification of a high-level, joint, spatial strategy for the delivery of comprehensive economic-led growth across the corridor through the local planning process."*

This is a 65 word sentence. For comprehension and readability sentences should ideally be no longer than 20 words or so. This one is so long it cannot be read aloud in one breath.

"...leading on the identification of a high-level, joint, spatial strategy for the delivery of comprehensive economic-led growth..."

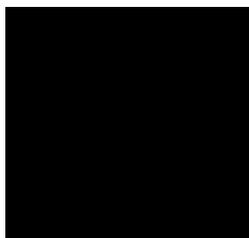
This is **jargon**, which the public cannot easily get to grips with. Why not just say “*..directing the production of a regional development plan*” ?

(Other than this gobbledegook statement and unsubstantiated comment at 1.7.5, the Plan lacks any real evidence that the Council is fulfilling its duty to cooperate, but that is another matter. It is also a fact that the Council has never publicised, or sought a public mandate for, its eagerness to adopt this high growth option.)

- 2.2 1.2.8: “*...a step-change in delivery mechanisms will be required...*” **Jargon**. “We need faster construction methods and a broader base of housebuilders.”
- 2.3 1.4.1: The **acronym** ‘OAN’ is used for the first time without explanation. The term is not included in the glossary.
- 2.4 2.2.1: “*...and the potential new station north of Sandy*” is casually dropped into the conversation, as if it is common knowledge. This is the first mention of a new station, so such a statement requires **explanation**. (In fact the preferred route for the E-W railway has yet to be determined or put to public consultation. Two of the route options are to the **south** of Sandy.)
- 2.5 2.6: **Confusion**. The section on the one hand says that development pressures (inter alia) are making it hard to maintain or enhance the environment and heritage assets, and then goes on to say new development could strengthen and enhance these assets. Really? Well, which is it? (And how is building on 4% of the Districts countryside, and destroying at least one heritage asset, going to strengthen the countryside?)
- 2.6 3.1.2, 3.1.3: An exercise in self-delusion and **hypocrisy**. As stated in the Plan’s introduction the District is characterised by “*Attractive market towns and beautiful villages surrounded by stunning countryside*”. In the context of the unprecedented loss of countryside envisaged in this Plan, the belief that it **enhances** Central Bedfordshire sets the author in the realm of economist, not land use planner. Yes, it will provide jobs; but it will also provide new people to fill those jobs. The Council will see improved revenue, but the essential character of the District will be mortally wounded.
- 2.7 A recurrent phrase is “*economic led growth*”. This is not explained in the glossary and is not readily understood by the public. Why, for example, is economic-led growth more important than housing need growth? Does it mean the economy is the driving force behind development? If so, what happened to the principles of responsible land-use planning? Does the economic yield of a development outweigh its environmental harm? An explanation is required for this phrase and its context within a planning framework.
- 2.8 There are numerous typos, and examples of lazy cut-and-paste. For example, Policy **SA4** (Biggleswade) requires pedestrian and cycleway links to Luton, some 20 miles away.
- 2.9 The above are but a few examples to demonstrate that the Plan document is not in a fit state for publication, let alone approval. A serious and professional edit would resolve 90% of the above issues. Others are more fundamentally ingrained into the contradictory fabric of the Plan itself.
- 3.0 Presenting fundamental courses of action as a fait accompli**
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- 3.1 The Council has never sought a mandate from its electorate for a fundamental change in the character and direction of the District’s future. At para 1.2.7 it enthusiastically extolls its role as ‘leader’ of the authorities advancing the implementation of the NIC Report. It takes it for granted that Central Bedfordshire should see itself at the forefront of massive growth as envisaged throughout the 27 authorities within the NIC’s arc. Before a similar announcement in the Consultation Plan last year, the public had no knowledge of this; indeed few had knowledge of the existence of the NIC, other than rumours about a railway.

- 3.2 There is a wide feeling that CBC has been less than transparent in its role. It assumes, on behalf of its population, that there is no other choice but to adopt a strategy of taking more than its fair share of housing growth over the next 20 years. There is in fact a choice, perhaps a not very realistic one, that Central Beds should become the 'garden' of the eastern arc; that its proximity to Cambridge be regarded as an informal green belt, in which wider communities can enjoy countryside leisure and recreation, free of the sight of ribbons of development along all the major roads. But there is a choice, but none has been offered to the electorate, indeed publicly the electorate has been threatened with government intervention if the Council did not provide for massive urban growth. (Cllr. Nigel Young, full Council Meeting January 2018.)
- 3.3 Regardless of the undemocratic manner in which the Council has forged ahead, the fact remains that (at February 2018) the NIC Report and recommendations have no more status than recommendations to the Treasury. They do not form part of National Planning Policy, notwithstanding they were referred to in last Autumn's budget. The Council is therefore being presumptive in basing the entire future strategy on this single non-statutory document. The public are being dragged along, whether they like it or not. This is undemocratic.
- 3.3 At **7.9** a new rail station at Tempsford is glibly referred to, as a certainty should that new town succeed. Again, the Council has been less than honest in its presentation of the facts. The brief to its consultants for the economic technical report required a scenario where the existing Sandy station was **relocated** to Tempsford. When concerned Sandy residents got wind of this (through the publication of the Technical Reports last year) the Council denied Sandy station would close. However, that would be a decision for Network Rail and service operators, not CBC. There is no other instance of two stations on this main line railway being less than two miles apart, and it seems unlikely that two stations would coexist. Yet here again is the Tempsford station. CBC is hoping that by the time a decision is made, it will be too late for affected residents and commuters to complain.
- 3.4 Once again the Council is guilty of misrepresentation and misleading the public. For the NIC report contains **four** route options for the E-W railway, two of which lie to the **south** of Sandy. A public consultation as part of the selection of a preferred route is planned for early 2018, but is not yet timetabled. The **Key Diagram at 7.4** shows *only* a route corridor **north** of Sandy, thus misrepresenting the NIC Report, to suit its own cause.
- 3.5 So far as the areas for future growth are concerned, **no alternatives** have been presented, nor, so far as anyone is aware, explored. If further growth is needed, this is where **it will** go is the attitude. There **are** alternatives. For example, the **NIC's 5th Studio** planning study, produced a case study for Sandy/Biggleswade, in radically different form to CBC's clumsy approach at Tempsford. It proposed a linked community in which both existing and new populations would benefit. (**Appendix B**) I make no comment on its merits other than to identify it as an **alternative**, ignored by CBC. (<https://www.nic.org.uk/wp-content/uploads/NIC-FinalReport-February-2018-Rev-A-optimised.pdf>)
- 3.5 This epitomises the undemocratic way CBC has chosen to put forward its own choice, by attempting to conceal from the public the fact that nothing is decided: that there are other possibilities. The Council's actions in producing this Plan cannot be described as 'transparent'.

Peter Carter
February 2018



Email: accesstoinfo@centralbedfordshire.gov.uk
Our ref: 1041633
Date: 8 February 2018

Dear Mr Carter

Freedom of Information Act 2000

I can confirm that the information requested is held by Central Bedfordshire Council. I have detailed below the information that is being released to you.

Is Central Bedfordshire Council accredited by, a corporate member of, or otherwise supportive of the PLAIN ENGLISH CAMPAIGN?

I am unable to find the answer to this question online or in any published information.

The reason for asking relates to the 2018 Pre-submission draft Local Plan.

Central Bedfordshire Council is not accredited by, or a corporate member of the Plain English campaign.

Please quote the reference number 1041633 in any future communications.

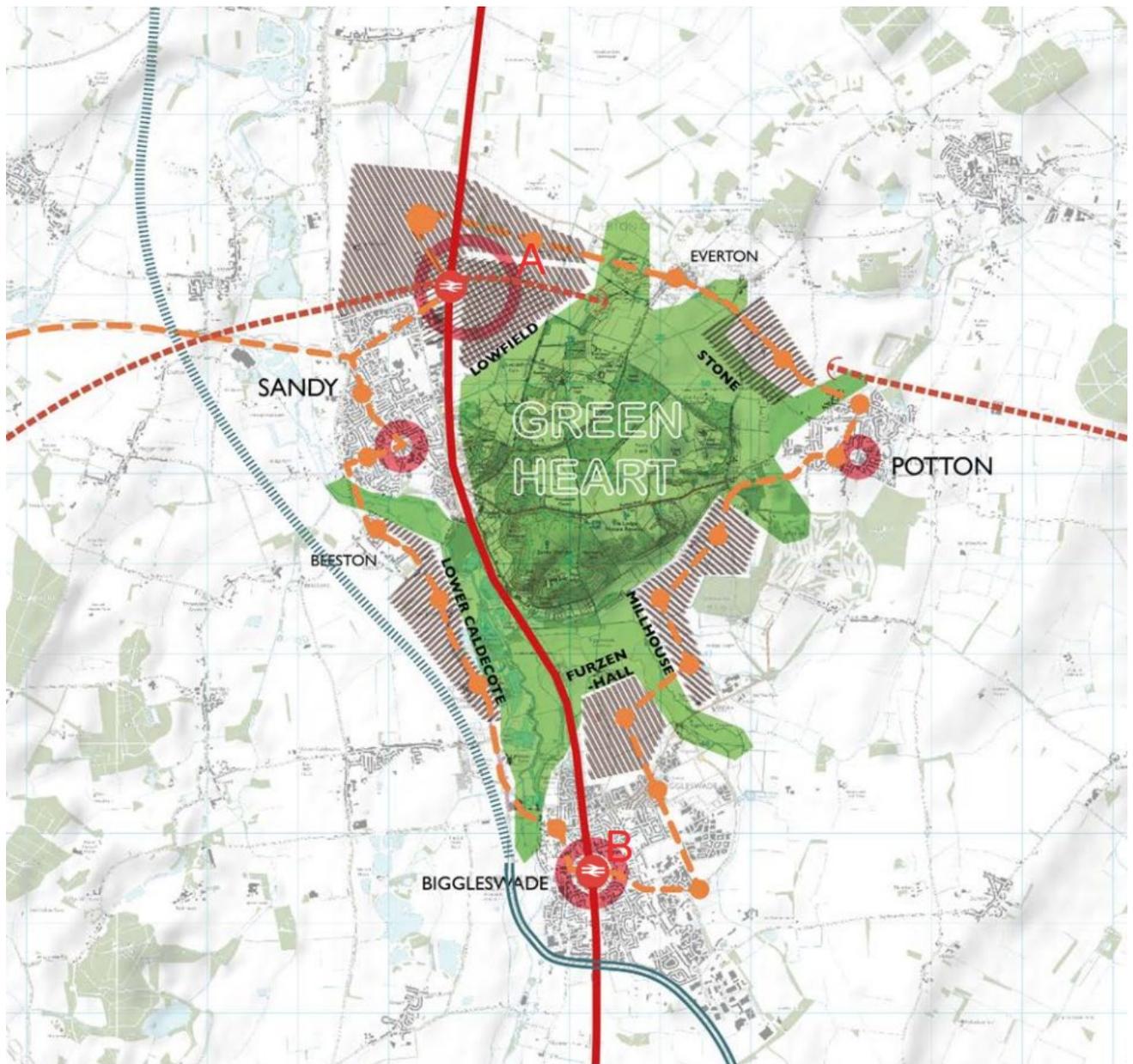
If you wish to request a review of this response, please contact us either by email (accesstoinfo@centralbedfordshire.gov.uk) or in writing to the reply address detailed below.

Access to Information
Community Services
Central Bedfordshire Council,
Priory House, Monks Walk
Chicksands, SG17 5TQ

If you are still dissatisfied with the Council's response after the internal review you have a right of appeal to the Information Commissioner at:

Central Bedfordshire Council
Please reply to:
Access to Information
Community Services
Central Bedfordshire Council
Priory House, Monks Walk,
Chicksands, Shefford
Bedfordshire SG17 5TQ

Telephone: 0300 300 8301
Email: accesstoinfo@centralbedfordshire.gov.uk



Extract from 5th Studio Report

<https://www.nic.org.uk/wp-content/uploads/NIC-FinalReport-February-2018-Rev-A-optimised.pdf>