



Local Plan Review

Have Your Say on the Future of Your Borough

ISSUES AND OPTIONS - CONSULTATION PAPER

Summer 2020

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1. Introduction and consultation information

Background

Every local authority in the country is tasked with preparing and adopting a local plan. The Government's policy document, the National Planning Policy Framework, describes a local plan as 'a plan for the future development of a local area, drawn up by the local planning authority in consultation with the community'.

Bedford Borough Council has prepared and adopted several local plans over the years. This means that planning policies are contained in more than one document and together those documents are known as the development plan. The development plan for Bedford borough is made up of policies in the following plans that the Borough Council has adopted:

- **Local Plan 2002.** Most policies have been replaced but some site specific policies relating to developments that are not yet complete are still needed (for example Wixams, north of Bromham Rd Biddenham and Wootton).
- **Allocations and Designations Local Plan 2013.** Some policies have been replaced but others remain relevant and up to date.
- **Local Plan 2030.** Recently adopted. Policies making provision for growth will need to be updated but most other policies will not need to be replaced.
- **Neighbourhood plans made.** At the time of writing, these cover the parishes of Carlton & Chellington and Oakley.

These documents are important because the law says that the local planning authority must make decisions on planning applications in line with adopted policies unless there are good reasons (known as material considerations) not to. If councils don't have up to date policies then it is very difficult to control where development takes place.

The Local Plan 2030 was adopted in January 2020 following an independent examination in public. National policy now requires that local plans are reviewed and if necessary updated every five years, but in Bedford's case the examination resulted in the inclusion of a new policy in the Local Plan 2030 committing the Council to a more challenging review timetable. An updated or replacement plan must be submitted for examination by January 2023.

The first reason given for this by the examining Inspectors was that there is a need for the Council to have a plan that responds appropriately to longer term growth requirements, and in particular in relation to the Oxford to Cambridge Arc, as soon as possible.

They agreed that because of the uncertainty about Arc-related development and infrastructure needs post 2030, the plan they had been asked to consider should not try to do that, but that the next plan should do so fairly quickly. The second reason related to the speed with which new development would be built in coming years and the progress being made by local communities with their own neighbourhood plans, which the Local Plan 2030 relies upon to identify housing sites. The Inspectors saw that an early review of the Local Plan 2030 offers the opportunity for the Council to intervene if necessary, in order to maintain house building rates.

The Oxford to Cambridge Arc

The Government has a long-term ambition to see economic growth in the Oxford to Cambridge Arc. The area within the Arc is shown in Figure 1. It extends to include Buckinghamshire and Oxfordshire authorities in the south and west to Cambridgeshire authorities in the east and north. Bedford borough lies in the centre of the Arc.

Figure 1 Defining the Oxford – Cambridge Arc



Taken from 'The Oxford-Cambridge Arc: Government ambition and joint declaration between Government and local partners'

In a document published by the Ministry of Housing, Communities & Local Government in 2019 the Government explained its ambition in more detail and, through the document, the local authorities across the Arc and other organisations (including the Local Enterprise Partnerships) have agreed to work together to consider the area's long term potential, and how that might be achieved.

More detail can be found in the document itself ['The Oxford –Cambridge Arc: Government ambition and joint declaration between Government and local partners'](#).

The Government has designated the Arc as a key economic priority and expressed its ambition for up to one million new homes to be built across the area by 2050. It has committed to completing a new East West Rail route joining Oxford to Cambridge as well as a new expressway, whilst improving the environment for the future. The joint declaration committed to a broad, joint public engagement exercise over summer 2019, and at the time of the Local Plan 2030 examination (and discussion about the plan's review policy) this engagement was anticipated as a means of taking forward discussions about how and where in the Arc this scale of growth might be accommodated.

However, the engagement has yet to take place and questions have been asked about the need for the expressway in the western section of the Arc. The section between the Black Cat roundabout and Caxton Gibbet is further advanced. In its Annual Monitoring report 2020 the National Infrastructure Commission acknowledged that 'there is still a long way to go and no clear plans have been brought forward to increase the delivery of new homes to reach the level needed'. In the report the NIC called on Government to clarify its position on and agreeing the route for the Oxford – Cambridge Expressway, maintain momentum on East West Rail, develop a spatial vision for the Arc, announce the locations of new settlements connected to key transport infrastructure, establish clear ministerial ownership for the Arc and publish the final report of its economic study into the area.

The corridor for the new East West Rail route has now been announced and further consultation (expected in late 2020 / early 2021) will help to identify the best alignment (Figure 2). The corridor chosen is good news for Bedford as it will bring the route through Bedford Midland Station, connecting the town directly to Oxford and Cambridge and supporting economic growth and prosperity by attracting businesses and jobs to the area. With this route East West Rail is forecast to bring over £20 million of additional economic activity to the borough.

Figure 2 The preferred corridor for East West Rail north of Bedford.



From the above it can be seen that little progress has been made on how the high-level ambitions for the Arc can or will translate into identifying where strategic growth is likely to be delivered.

Work on this local plan will therefore focus on how to meet Bedford Borough's own growth requirements based on the Government's published standard method for calculating housing need. This alone will be a significant challenge because it represents a 35% increase in the annual level of housing growth contained in the Local Plan 2030. Further detail about this is given below.

Neighbourhood Plans

Twenty neighbourhood plans are being prepared in Bedford Borough and those that are identifying sites to meet growth targets in the Local Plan 2030 are making good progress. Two have so far been 'made' following local referendums meaning that they are now part of the development plan along with the plans that the Borough Council has prepared. Up to date information about neighbourhood plans can be found on the Council's [neighbourhood planning](#) web pages.

In due course parish councils with neighbourhood plans in place will decide if they want to review those plans to allocate development beyond 2030, either in accordance with the local plan review or because there is a local need to do so. If parish councils do not want to update neighbourhood plans then they can work with the Borough Council to include in the local plan review any additional sites that are needed.

What is this consultation about?

The process for the preparation of a local plan is set out in Government legislation and includes consultation with the public and statutory bodies at set stages. The purpose of this paper is to ask for your comments on the scope of the plan; the issues that its policies should cover and the options available to address them. Our website will be kept up to date with all of the relevant information www.bedford.gov.uk/localplanreview.

While the scale of housing and associated growth is set by the Government, there are a number of different ways in which this can be achieved. We are asking residents and people who work in the borough, as well as statutory consultees and others with an interest in our plan, for your opinions to help us plan for future development and identify what issues are important. This is your first opportunity to help shape the local plan review.

Sustainability appraisal and scoping report

Sustainability appraisal is a process that makes sure that the environmental, social and economic effects of a plan, and reasonable alternatives to the plan, are being considered. As a first step, a Scoping Report has been prepared in consultation with the Environment Agency, Natural England and Historic England to identify the key sustainability issues that are relevant to the new local plan and develop a framework for appraisal. This framework will be used to test the social, economic and environmental impacts of emerging options for the local plan. It will help in developing the most sustainable strategy for future development in the borough and identifying where measures are necessary to mitigate any negative effects that cannot be avoided. The results of this testing will be included in a draft Sustainability Appraisal Report which will be published alongside the draft local plan for public consultation next year.

How to get involved

Questions on key matters are highlighted in various places in the document and you should answer these on the separate response form; however you do not have to answer every question. The easiest way to comment is by using our on-line consultation page. We prefer you to use this facility because it is easy for you to use, helps us and you to maintain accurate records and also helps at later stages with the formal local plan examination process. You can save and go back to your questionnaire responses at any time during the consultation period so you do not have to complete it in one go. The system will also enable you to keep track of the comments you make at each stage of the plan's preparation going forward.

Alternative ways to comment:

Download the word version of the questionnaire available on the webpage. Once you have completed it please send it to planningforthefuture@bedford.gov.uk.

Complete a paper questionnaire (which can be requested by calling the Planning Policy Team on 01234 718070). When completed this should be sent to (please use a stamp):

Planning Policy Team
Bedford Borough Council
Borough Hall
Cauldwell Street
Bedford, MK42 9AP

A paper copy of the Issues and Options Paper can be viewed **by appointment** at the Council's Customer Service Centre at 2 Horne Lane, Bedford MK40 1RA (01234 267422). It will also be available in all libraries in the borough as well as Biggleswade, Rushden, Flitwick and St Neots libraries during normal opening hours should access restrictions be lifted before or during the consultation period.

Responses received will be published on the Council's web site and attributed to source (this may include your name and a reference number). All responses will be treated in accordance with the Data Protection Act 2018. The Privacy Statement relating to the local plan can be [viewed here](#).

Do you have questions or need further information?

You may have questions or require more information before you feel able to comment. Ordinarily we would hold drop in sessions around the borough, however due to current COVID19 restrictions we are unable to do this. To assist you we have an **FAQs** section on our web page www.bedford.gov.uk/localplanreview which covers common queries and information which may help you. If not, you can **email your question** to planningpolicy@bedford.gov.uk – ideally put 'consultation question' as the title of your email. Additionally we have a dedicated phone line (01234 718300) where you can **leave an answer phone message**. We will monitor these and ensure the most appropriate officer calls you back within three working days. Please give a summary of your question and leave your name and contact number.

The consultation will close at 5pm on 4th September 2020

Please note the closing date for submitting potential development sites is 14th August 2020 – see call for sites below.

The next steps and timetable

The responses to this issues and options consultation will help us write a draft plan, which you will have an opportunity to comment on in mid-2021. This will help us gauge public reaction to proposed draft allocations and policies and make changes to improve the plan. A further consultation on a final 'plan for submission' will take place during summer 2022, after which we will consider responses and submit the plan to the Secretary of State for independent examination. More details about this timetable are set out below:

Local Plan review timetable

2020	Autumn – winter 2020	Summer 2021	Autumn 2021- Spring 2022	Summer 2022	Autumn 2022	Jan 2023	Throughout 2023	Winter 2023
Evidence base gathering Issues and options consultation	Consider responses to Issues and options consultation and call for sites information Undertake site assessments Evidence base gathering Consider options Prepare draft plan	Draft plan consultation	Consider submissions to draft plan and prepare plan for submission	Plan for submission consultation	Consider responses to plan for submission consultation and prepare final plan and supporting documents	Submit plan to Planning Inspectorate	Examination in Public involving public hearing sessions Likely to include consultation on main modifications Publication of Inspectors report	Adoption of plan

National policy sets out the broad planning principles that local plans must comply with. Importantly it explains that the local plan is the basis for making decisions on planning applications and that is why it is important that the plan is up to date.

More information on publicity and consultation in the local plan process and guidance on how to make effective comments are contained in the Statement of Community Involvement 2019 (www.bedford.gov.uk/SCI) as temporarily amended to take account of restrictions in place during the COVID19 pandemic.

Scope of the plan

This plan review will focus mainly on growth and infrastructure (housing, employment and supporting infrastructure). It is the Council's view that because they have been recently adopted, the majority of the development management policies in the Local Plan 2030 do not need to be updated. However, some of our policies are older and local evidence or national guidance means that those policies need to be brought up to date.

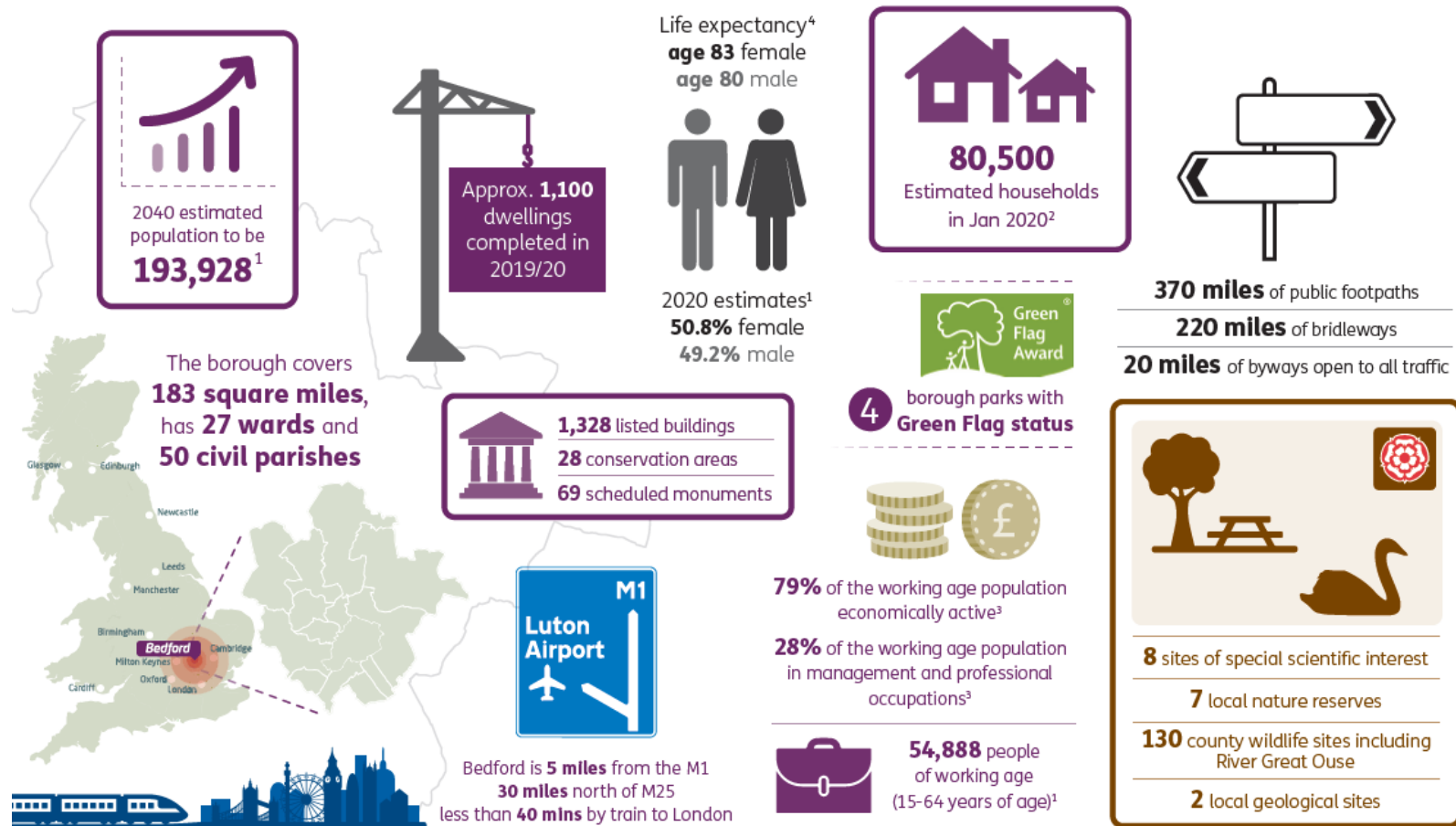
Through the local plan review we propose to

- develop a strategy and allocate new development sites to accommodate growth in line with national policy requirements
- include new policies for the repurposing of the town centre
- include policies to improve the quality of development
- include a policy to deliver self & custom build opportunities
- consider the need for additional policies to address climate change
- consider the need for policies to control the location of food outlets
- consider the need to update open space standards to be provided alongside new development
- consider the need to change current policies for the natural environment following the publication of the Environment Act

Question 1

Do you agree with the proposed scope of the local plan review? If you think that other areas of existing policy should be updated or new policy areas added to the list, please explain what they are and your reasons for wanting them to be included in the plan.

2. Setting the scene



1. Subnational population projections for England: 2018 based 2. from LLPG data 3. ONS Labour market profile for Bedford Oct 2018-Sept 2019 4. Public Health England.

About Bedford Borough



DRAFT VISION

By the end of the plan period:

The borough will have become a greener, more sustainable and more attractive place to live. Tackling climate change and adapting to and mitigating against its effects will be at the heart of new development throughout the borough including facilitating sustainable food production.

Well-planned growth avoiding areas of high flood risk will support the creation of strong, safe and sustainable local communities in environments that facilitate healthy and independent living for all. Sustainable development and transport, the use of sustainable and renewable energy technology, green infrastructure and new green spaces will all contribute to reducing the borough's carbon footprint and securing a net-gain in biodiversity.

The development of East-West Rail through Bedford will be complete. Bedford will benefit from a new town centre transport interchange including links to Oxford and Cambridge, increasing connectivity, investment and growth. Local development will be well served by transport links and speedy internet access integrated into the planning process and completed before residents move in. Bedford borough will continue to attract new business through the completion of significant infrastructure projects, in and close to the borough and through the development of high quality commercial and office spaces. Greater connectivity will have a positive impact on the local economy attracting high tech employment sectors, creative industries and supporting existing retail centres.

In Bedford's town centre a wide range of uses will provide greater variety and a broader visitor experience that will make the town centre more diverse and sustainable. Improvements to the High Street will turn it into a place to enjoy, where niche retailers predominate and people choose to linger. The development of previously planned vibrant new town neighbourhoods will be complete, widening housing choices, improving quality of life for Bedford residents and transforming sites on the western side of the town and south of the river. Increased town centre living will encourage sustainable methods of travel, increasing the vitality and viability of the town centre and support for local businesses. The town centre will be used increasingly as a community space, accessible to residents in the town, the borough and beyond.

Good design will help to create safer, vibrant and more sustainable neighbourhoods, both in the urban area of Bedford and Kempston and in the surrounding village communities. This will include school places, health facilities, community halls, green

spaces and other services. The borough's built heritage and wider historic environment will continue to be respected, protected and valued.

The borough's countryside, its intrinsic character and beauty including areas of tranquil retreat will be recognised. Rural communities will embrace sensitive development through neighbourhood plans that provide and support much needed housing and employment, rural facilities and services, including public transport. Locally important green spaces and valued local landscapes will be protected and enjoyed by all.

Whilst the Embankment and formal Victorian parks will continue to be seen as the jewels in Bedford's crown, there will be new multifunctional green spaces to complement the existing network of paths and green corridors, linking these together in a ribbon of protected green and blue space available to all. Country parks north of Brickhill, west of Bedford and in the new town centre neighbourhoods will have matured. The Bedford to Milton Keynes Waterway Park will provide a new strategic green and blue corridor, linking Bedford with Milton Keynes to the west and the wider network to the east, encouraging healthy lifestyles, tourism, river transport and a rich ecology.

The Forest of Marston Vale will continue to grow and mature, transforming the landscape. Together with the completed Bedford River Valley Park this part of the borough will be transformed through new leisure opportunities, encouraging increased visitor numbers. The development at Stewartby Brickworks will be complete, forming a new community on the old brickmaking site, celebrating its heritage.

Question 2

Do you have any comments on the draft vision? If you think that it can be improved, please tell us how.

3. Strategy and Infrastructure

One of the main purposes of the local plan is to decide where growth in homes and jobs should occur. This is known as the development strategy.

The recently adopted local plan's development strategy is to direct growth in the first instance to available sites in the Bedford / Kempston urban area and the large brownfield site opportunity at the former Stewartby brickworks. Following this, growth is directed to the larger villages (except where there are already large-scale commitments or nearby), with more in the key service centres and less in the rural service centres. This strategy reflects the availability of facilities, services and accessibility by public transport. It safeguards the intrinsic character of a living and working countryside. Although this strategy works for the current local plan, it does not deliver sufficient growth to meet the anticipated needs over the longer period that the new local plan will have to provide for.

National Government guidance requires that local planning authorities undertake a Local Housing Need Assessment to determine how many new homes need to be built in their area over the plan period. Unless there are exceptional circumstances, this assessment must use the Government's standard method for calculating the number of homes needed. The standard method calculation is made using Government projections for the expected increase in the number of households in the area, adjusted to take account of housing affordability pressures. The principle of the adjustment is that in places where affordability is a significant barrier to those wishing to enter the housing market, additional houses are provided in the hope that this will increase supply and improve affordability. Councils must also plan for any additional growth which cannot be accommodated in neighbouring areas.

In Bedford's case, the Council does not think that exceptional circumstances exist, which means that the standard method should be followed. At the present time, none of the Council's neighbouring local authorities have indicated that they need Bedford to accommodate any of their growth.

Whilst the Government has set out its ambitions for growth in the Oxford to Cambridge Arc the local authorities have not as yet agreed an Arc-wide spatial strategy. At the present time there has been no specific suggestion from Government that Bedford should plan for a housing figure over and above the standard method number, and no agreement about how any additional growth associated with the Oxford to Cambridge Arc would be distributed.

Bedford's annual housing requirement calculated in accordance with the standard method is currently 1,305 dwellings per annum. If the end date of the plan is 2040, using this figure there would be a need to plan for 26,100 dwellings over a 20 year plan period.

It is important to note, however, that during the course of the plan preparation period this figure may change. There are two reasons for this. Firstly, the Government figures for affordability are published annually (and may therefore change when new data is published in March 2021); and secondly, the Government has announced that it intends to review the standard methodology in its entirety in the course of this year.

Taking account of these uncertainties this consultation seeks views on a housing figure in the range of 800 –1,305 dwellings per annum. It should be borne in mind that an annual figure of 1,305 dwellings per annum would represent an increase of 35% on the current adopted Local Plan 2030 figure of 970 dwellings per annum. The 800 figure represents an estimate of the possible figure were the standard methodology to be reviewed and based on the 2018-based population projections rather than the 2014-based figures.

Once existing commitments, currently around 11,000 dwellings, are taken into account (including allocations in earlier local plans, neighbourhood plans and planning permissions granted) we may need to make new allocations to provide between 5,000 and 15,000 additional new dwellings over a plan period to 2040, depending on the Government's formula. To 2045 we would need to allocate between 9,000 and 21,625 additional new dwellings. A new strategy is therefore needed. Of course, new housing growth will need to be supported by infrastructure, jobs, shops and other facilities and these topics are discussed later in this paper.

Turning to allocated employment sites, these have come forward at a pace in recent years, with investor and developer appetite for sites. Speculative development of commercial premises, mainly along the A421, has also returned to the borough after a number of years of solely occupier led development occurring. Institutional investors such as L&G Investment Management, Buccleuch Property, Trinity Investment Management and international developers including London Metric, Goodman, Gazeley, Wrenbridge and Canmoor have all recently acquired assets and sites in Bedford.

New property is coming to market at Wilstead Industrial Estate and Bedford Link; with more in the pipeline at Bedford Commercial Park and Wixams Logistics Park along with a number of other emerging sites. This current demand is demonstrating market appetite for opportunities in Bedford, as a key investment location along the M1 corridor and the Oxford to Cambridge Arc area.

The SEMLEP Industrial Strategy vision provides a framework for Bedford to attract and deliver innovative and high-value economic growth in sustainable sectors, with the infrastructure, commercial property and skilled workforce to contribute to gross value added (GVA) increases. SEMLEP has identified Bedford's unique strength in the high performance technology, manufacturing & advanced technology, logistics & supply chain and creative & cultural sectors, which is of national and international significance, and can be capitalised and built on.

Question 3

In line with Government policy, the shortest plan period would be 2020 to 2040. Do you agree with this plan period? If you think the plan period should be longer, what plan end-date would you suggest and why?

Potential locations for growth

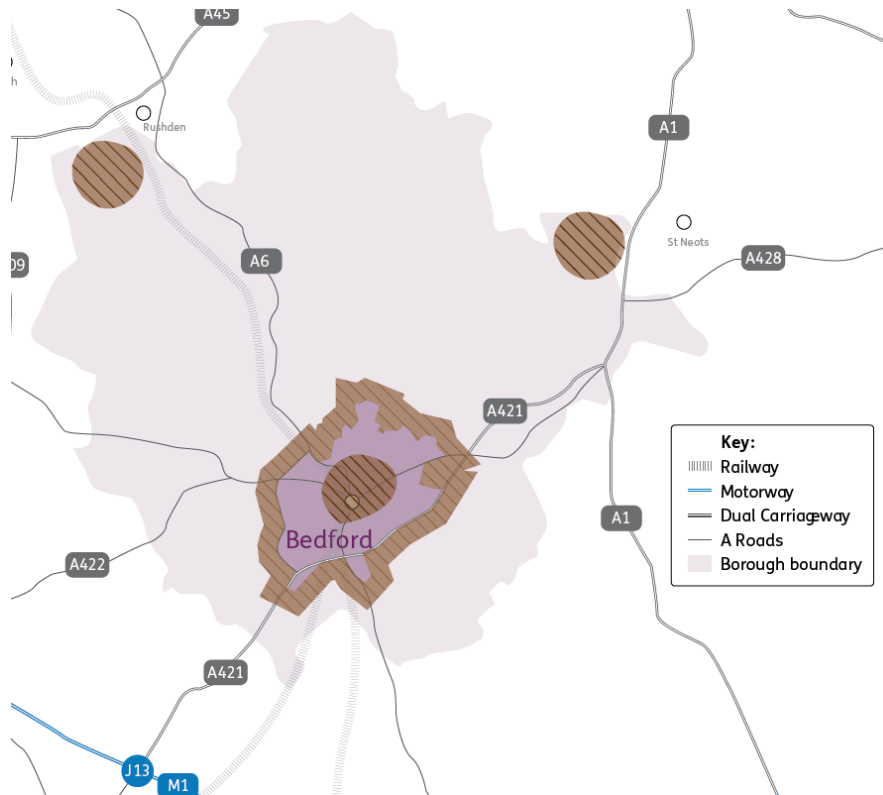
Potential locations for housing and employment growth include:

- further regeneration within the Bedford / Kempston urban area, particularly of any available brownfield sites;
- expansion of the Bedford / Kempston urban area;
- expansion within the borough boundary, of neighbouring urban areas, such as Rushden and St. Neots;
- development along the A421 corridor;
- development around an East West Rail northern station;
- new settlements in locations with good accessibility;
- more dispersed development throughout the borough including the expansion of villages.

Combinations of these are illustrated in the diagrams below. It may be that the local plan strategy will need to combine elements from more than one of the locations to achieve the scale of growth required.

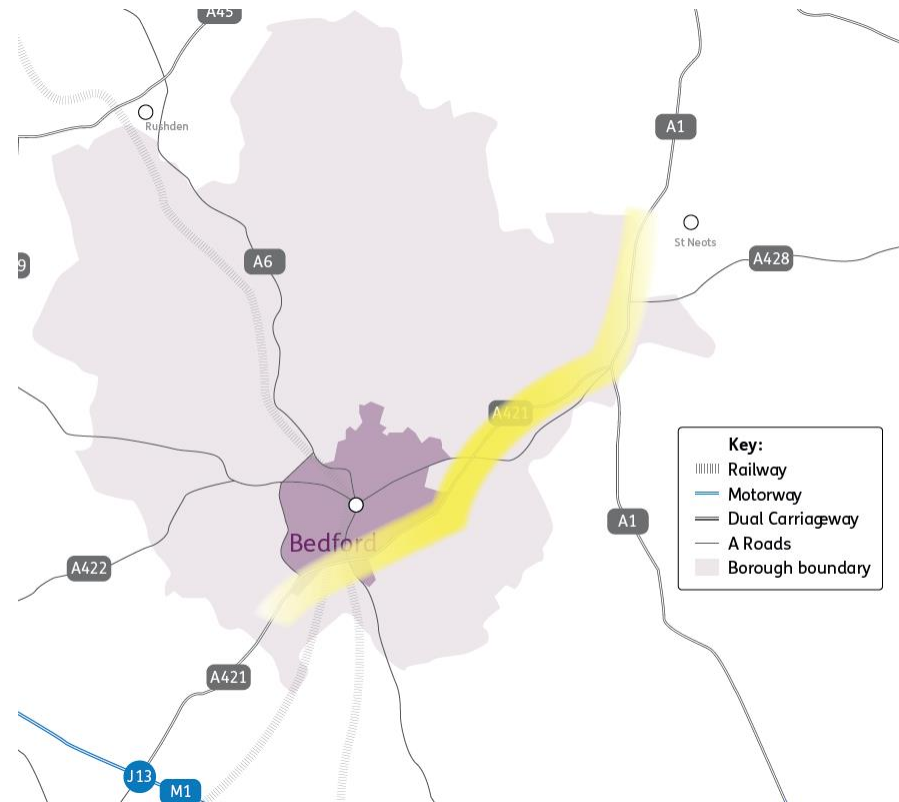
Brown - Urban based growth

Growth in and around the Bedford / Kempston urban area, together with extensions to Rushden and St. Neots. Building at higher densities in and around urban areas could deliver a significant number of homes.



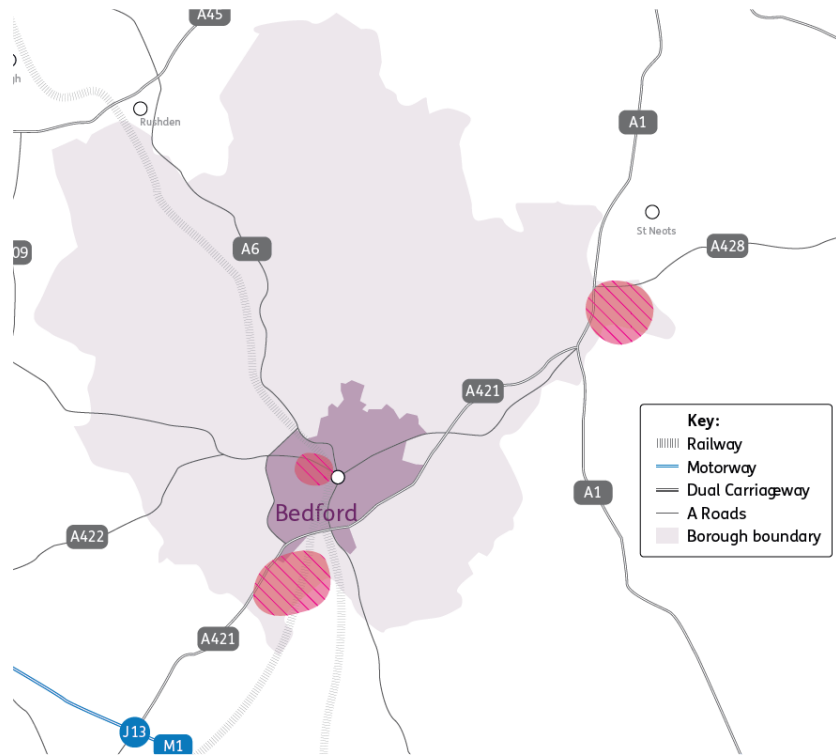
Yellow - A421 based growth

Growth along the A421 road corridor where there are already good road links and opportunities to improve road-based public transport. It could involve growth around the south side of the Bedford / Kempston urban area and the expansion of villages between Stewartby and Great Barford.



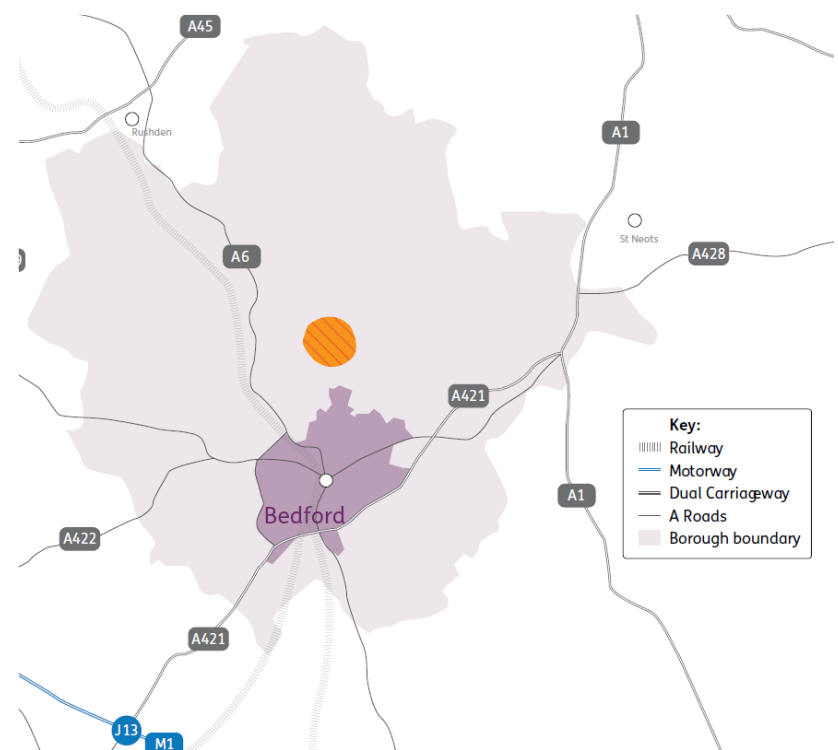
Pink – Rail growth

Growth along the planned route of the East – West railway taking advantage of the sustainable connectivity that it could bring with growth south and west of the Bedford / Kempston urban area where the railway already runs and centrally benefiting from the interchange at a redeveloped Bedford Midland Station. There would be significant potential for growth around Tempsford to the east



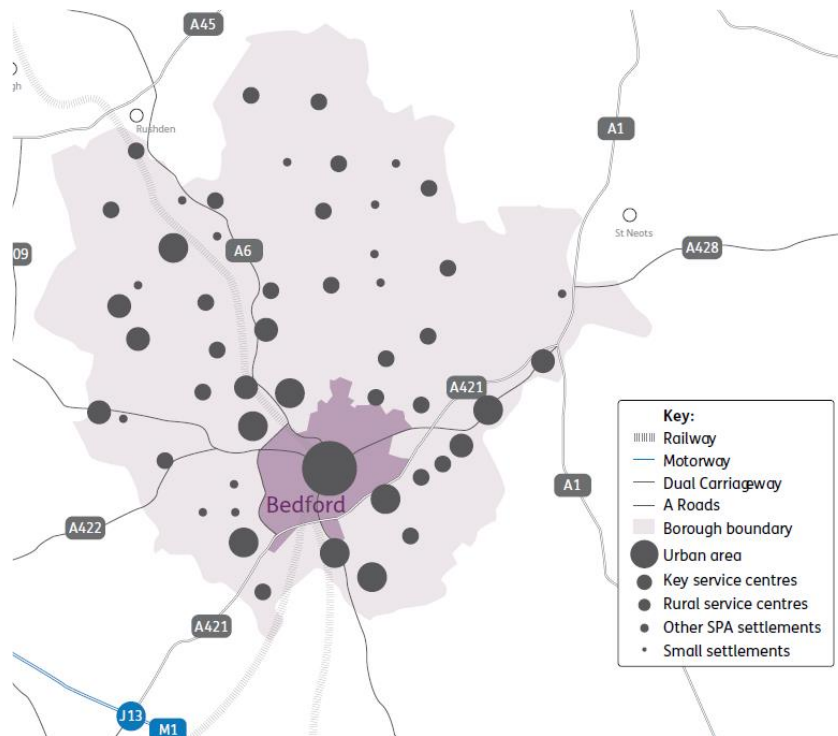
Orange - East – West rail northern station growth

This relies on an additional station to the north of Bedford. There would be significant potential for growth north of Bedford, which could also link with a new settlement.



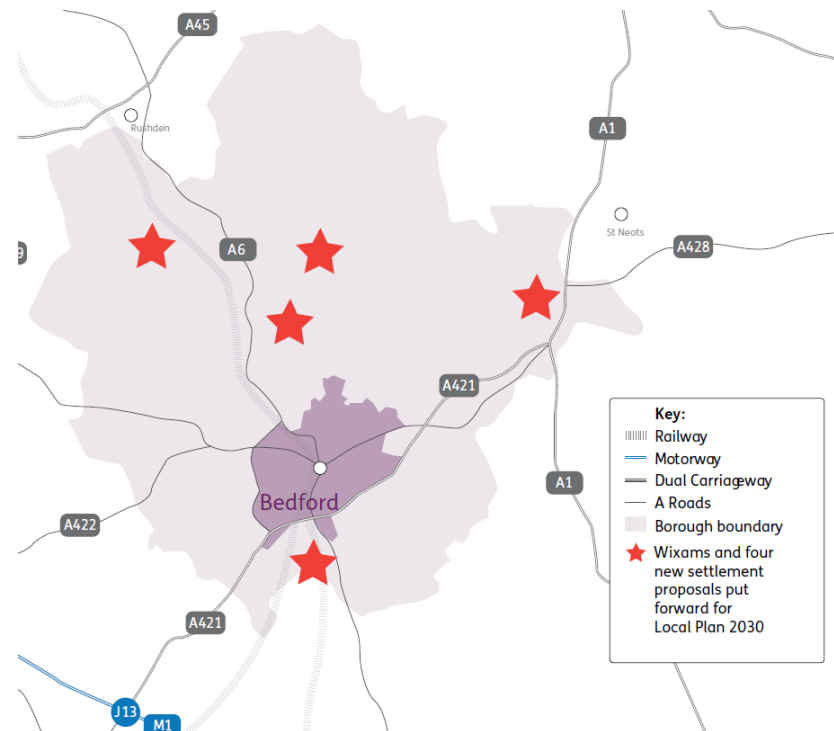
Grey – Dispersed growth

Growth spread proportionately across the borough.
There would be growth in and around the urban area
and some expansion in all villages.



Red - New settlement based growth

In addition to expansion of Wixams a number of new settlements could be developed. During the course of the preparation of the Local Plan 2030 four potential new settlement options were discussed but were not taken forward at that time. These and other new settlement options that have yet to be put forward could be considered as part of this plan.



We would like to hear your views about these potential locations for growth. Table 1 sets out some of the advantages and disadvantages of each as prompts for your thoughts.

Table 1 Advantages and disadvantages of the potential locations

Location	Pros – advantages	Cons – disadvantages
Brown – Urban based growth	• Supports services, facilities and businesses in urban areas, particularly Bedford town centre. • Urban locations have the greatest potential for residents to make sustainable travel choices (walking, cycling and public transport). • Increasing development density improves public transport viability. • Makes good use of brownfield and under-used land. Higher density development more appropriate in urban locations. • Reduces need for growth in rural areas. • More employment uses (e.g. business services) within centre will improve viability and create direct benefits of other associated business uses such as retail and leisure.	• Opportunities for growth within urban areas are limited, so most growth would be on edge of urban area and closer to existing villages. • Very high density schemes could be out of character and affect local distinctiveness. • Growth may overstretch existing services, facilities and infrastructure in towns. • Expansion of Rushden and St.Neots (within Bedford borough) may not be supported by those towns. • Rural locations would miss the benefits associated with growth. • Restricted sites sizes can restrict scheme options and opportunities to mitigate risk for investors. • More development at high density in the urban area may contribute to poor air quality issues.

Location	Pros – advantages	Cons – disadvantages
Yellow – A421 based growth	• Takes advantage of existing and proposed road infrastructure improvements. • Close to existing employment areas with good connections. • Continues the regeneration of the Marston Vale and the creation of the Community Forest. • Reduces need for growth in other rural areas. • Opportunity to extend the established settlement at Wixams with access to the new rail station. • Provides the opportunity to phase growth, linked to upgraded infrastructure. • Could incorporate a western expansion of St Neots or a new settlement at Wyboston. • Capitalise on proximity and reduced travel time to high-value Cambridge market.	• Could encourage car use and increase pressure on A421 junctions. • Requires improved connections into urban areas in order to access facilities otherwise residents may travel on to larger towns. • Could appear as urban sprawl and join-up nearby villages. • Other locations would miss the benefits associated with growth.
Pink – Rail growth	• Combines some of the benefits of urban and A421 growth location options. • Opportunity to extend the established settlement at Wixams with access to the new Wixams rail station (Thameslink) and a link to an enhanced station on the East-West rail line. • Reduces need for growth on villages. • Opportunities for high-tech employment development in association with East-West rail services in balanced communities with the option to live and work locally. • Increases employment opportunities in the urban area and sustainable methods of transport for those residents in most deprived areas.	• Would also have the disadvantages of growth focused on the urban fringe, including visual impact of strategic-scale growth on local landscapes. • Exact route of the railway not yet known. • Other locations would miss the benefits associated with growth.

Location	Pros – advantages	Cons – disadvantages
Orange – East-West rail northern station growth	• A new parkway rail station north of Bedford could reduce traffic congestion in the town and provide parking. It could also serve any new settlements north of Bedford. • Reduces need for growth on villages. • Opportunities for high-tech employment development in association with a new East-West rail station providing option to live and work locally. • Provides opportunities for sustainable and active transport links, both between new settlements and to the urban area.	• Would also have the disadvantages of growth focused on the urban fringe, including visual impact of strategic-scale growth on local landscapes. • Exact route of the railway not yet known. • Rail station north of Bedford is not currently part of the route proposal. Addition of a station would increase journey times between Oxford and Cambridge. • Development north of Bedford is unlikely to be possible without a northern station. • Other locations would miss the benefits associated with growth.
Grey– Dispersed growth	• Every community contributes proportionately to achieving the growth target. • The impact of growth on infrastructure is spread around the borough rather than focused on a smaller number of locations. • Would open up new markets, assist in providing small housing sites and help early delivery of new homes. • A greater number of communities see the benefits of growth for example in supporting local services and facilities.	• May require growth in communities that have no or very few facilities. This may encourage more car use as residents have to travel further, making walking and cycling less attractive. • Would still require significant growth in and around Bedford if it were to take its proportionate share. • Lack of a focused critical mass of development makes providing new strategic infrastructure more difficult. • Unlikely to facilitate employment growth due to dispersed nature.

Location	Pros – advantages	Cons – disadvantages
Red – New settlement based growth	• Potential for sustainable growth using garden village principles, creating self-contained new communities with good infrastructure provision. • Would reduce the amount of development that must be accommodated in other locations. • Detached ‘rural’ setting enable property construction and create ambiance which higher value occupiers aspire to. • Provides opportunities for sustainable and active transport links, both between new settlements and to the urban areas.	• New settlements take a long time to plan and build, leading to short to medium-term housing supply shortages. • There could be an adverse impact on local landscapes, loss of agricultural land and countryside. • Issues with new settlement proposals previously put forward would need to be resolved before they could be allocated. • Significant new infrastructure may be required to accommodate growth.

Whatever strategy is eventually chosen it will be essential that adequate infrastructure is built-in from the start. The delivery of new infrastructure to meet the needs of the local community and business is crucial to the development of Bedford as an economically prosperous, attractive and healthy borough. To support the local plan, the Council will prepare an Infrastructure Delivery Plan that will set out the funding and implementation mechanisms needed to secure the delivery of the local plan strategy. In preparing this, the Council will work closely with Government, infrastructure providers and the development industry to align investment priorities and strategies to ensure, wherever possible, the up-front provision of key strategic transport and community infrastructure. The Infrastructure Delivery Plan will be published for your comments alongside the draft plan next year.

As part of this Issues and Options consultation we are also asking you to tell us about sites that are available for development (see the ‘Call for sites’ section below). This will help us to decide the final local plan strategy.

Question 4

Having considered the potential locations for growth illustrated above, and the pros and cons in Table 1, which one(s) if any do you support? It may be that the local plan strategy will need to combine elements from more than one of the locations to achieve the scale of growth required. Can you suggest other locations?

Question 5

Infrastructure needs building in from the start to ensure new development is suitably accessible and supported. What infrastructure do you consider is key to the delivery of growth in Bedford borough?

Housing

In addition to setting the quantum of housing to be provided in future years the plan review will also need to respond to a number of additional policy requirements which have emerged since the drafting of the Local Plan 2030. National planning policy now requires that 10% of housing delivered in the plan period be located on sites of one hectare¹ or less. Whilst many of these sites will be provided through windfall development (sites that are not expressly allocated in local plans) the plan will need to have regard to the need to allocate a range of sizes of housing sites including smaller sites.

During the course of the preparation of the Local Plan 2030 the Council considered whether new settlements might form part of the development strategy but ultimately found that none of the proposals was ready for allocation. New settlements remain an option for this plan but only where there is a clear case that they would be developable in the plan period.

¹ A hectare is 100 metres by 100 metres, or the green space inside a 400 metre running track. One hectare could contain 30-35 dwellings based on average densities.

The provision of affordable housing remains an important part of any development, as does the need to provide for housing to meet the needs of particular groups such as families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes. The Council's Local Plan 2030 already takes account of the change to the Government definition of affordable housing in 2019 but it does not contain a policy for self-build housing as at the time of the Local Plan examination the Inspectors did not consider that there was sufficient local evidence to justify one. The Council is looking at the available evidence to determine whether a policy could or should be included in this plan.

Employment

[The Economic Vision for the Oxford – Cambridge Arc April 2019](#), sets out that the Arc will be:

- A place where specialist commercial knowledge and skills collide with world-leading research and development assets to shape existing and new industries.
- A testbed for innovation that will shape the twenty-first century.
- A business growth-enabled environment where our ideas and inventions are rapidly commercialised and spun-out, whilst our most exciting entrepreneurs are supported to scale-up new services, products and markets.

Bedford borough has a skilled workforce, an above average rate of employment and a high proportion of 'top level' occupations. The economy of Bedford is diverse and vibrant, however many of the most skilled jobs are located outside of the borough as Bedford benefits from good strategic connections to nearby economic centres. The planned East-West Rail route and strategic road improvements will further improve those connections, providing good links to Cambridge in particular. The wider area's existing strengths and potential mean that there is an opportunity to improve Bedford's economic strength by reversing that commuter flow and attracting investment in new high value, knowledge intensive industries to the borough.

The recently adopted local plan does not allocate new sites for employment because there was already sufficient land available that had not been occupied. However, that situation will change over this plan period. Similar types of business often choose to cluster together and the improved strategic links along the A421 corridor suggest that this might be a good location for much of the

required growth to occur. Demand for buildings in Bedford with its excellent and growing transport links and proximity to other towns, including the capital within short journey times, will continue.

Attracting businesses back to the urban area and town centre could increase the viability of other uses such as retail and leisure.

Existing centres of excellence in the borough, such as Colworth Park, demonstrate high value businesses clustering together around, in this example, a clear anchor tenant with Unilever utilising the site as one of its two main UK R&D centres. The park, while home to a number of businesses in various sectors, is host to a cluster in the food & drink research and development field.

The borough also contains unique assets such as the former airship sheds at Cardington, which now host major movie productions for amongst others, Warner Bros and Disney. The creative sector is one of the fastest growing in the East of England that graduates aspire to enter; the opportunity to cluster similar sector's businesses around the activities in the sheds is substantial.

Question 6

More employment sites will need to be allocated alongside housing growth. Where do you think new employment sites can be located in Bedford borough?

Question 7

Connectivity to other economic centres, including Oxford and Cambridge, will improve with East-West Rail. How do we capture the benefits of this greater connectivity to these economic centres, to improve and increase the value of the economy of Bedford?

Town centre

There has been much discussion in recent years about the future of town centres. Some are predicting the end of traditional High Street shopping because of the increasing preference of people to shop on-line. Town centres across the country have seen an increase in the number of vacant shop units. However, for many people the town centre is an important place to visit because of its accessibility and the concentration of leisure and entertainment facilities. Independent niche retailers are attracted to Bedford town's historic core while some national chains have left to concentrate on larger out-of-town or regional shopping centres. The Council is already investing to improve the appearance of Bedford town centre and make it a place where people want to linger and is encouraging more community uses and housing.

Given the significant changes in town centres and shopping that are occurring nationally, a comprehensive approach to the future of Bedford's town centres will be required. Such an approach will extend beyond what the local plan can achieve and will involve everybody with an interest in Bedford.

Following a consultation on the town centre last summer the Council received responses from many of you in relation to two key questions. A summary of the responses is published in the draft Town Centre Plan and given below:

Consultation Responses

The Town Centre Consultation received over 2,000 responses, through online surveys and town centre workshops, and focused on two key questions:

- What is your favourite thing about Bedford Town Centre?
- What would encourage you, or people you know, to use Bedford town centre more?

These responses have helped shape this Town Centre Plan.

Consultation Responses: 'What is your favourite thing about Bedford Town Centre?'

Leisure and Entertainment

14% of responses were related to favourite things about Bedford.

"The Riverside restaurant complex has made me come into Bedford a lot more as I like the variety of restaurants and use one of them at least weekly, if not more."

"The pop up soft play and table tennis are a great idea"

"The restaurants, mainly the independent ones"

"Variety of restaurants by the river"

Retail

Over 23% of comments mentioned Retail as their favourite thing within the town centre.

"The number of independent shops is amazing, and much more interesting to browse through them than to go to all the usual chains"

"The range of independent businesses"

"The different markets gives shoppers the opportunity to support local businesses and their produce, e.g. food, crafts, horticulture"

"Picking up a few things I need from either independents or nationwide retailers"

Connectivity

This category was mentioned in nearly 16% of responses.

"The pedestrianised area makes moving from shop to shop easy & relaxed"

"The layout is clever and accessible"

"Bedford Town centre is so accessible and all of the shops are in close proximity to one another"

"It's close to where I live"

Culture and Environment

This category was mentioned the most in 34% of comments.

"Our beautiful Embankment...we should do more things with it"

"I think the Embankment is wonderful and there is a great selection of cafes and restaurants"

"I like the old buildings, the high street has character"

"The evolving cultural centre"

"Little quirks like the faces statues and twinkly steps"

Community

This category was mentioned in just over 1% of responses

"Sense of community"

"Inclusive, clean and friendly"

"Multi-cultural community"

"Familiar people with familiar connections"

"The number of community events and festivals mean there is always something going on at the weekends"

"A vibrant mix of cultures and people"

Miscellaneous

This category was mentioned in nearly 15% of responses.

"Everything"

"Lots going on for a town of its size"

"The work being done by the council to improve the town centre"

"It's still got services like banks, post office etc."

"I think Bedford provides a market town vibe which feels intimate"

Consultation Responses: **"What would encourage you, or people you know, to use Bedford town centre more?"**

Leisure and Entertainment

Responses to this question included just over 9% of mentions for this category.

"The events held there during the summer holidays made it a vibrant place to be. More of those please!"

"Indoor play areas for children with good café, kids activities in general"

"A café where you can sit by the river in the town centre... it's so underused"

"More arts and craft classes"

Retail

Over 45% of people mentioned retail as something that would bring them into the town.

"More varied selection of shops, large departmental and independent"

"More high street brands coming back to the town centre"

"Better variety of shops"

"More small retail units showcasing local independents businesses and artisans"

"Better range of shops"

Connectivity

Connectivity was mentioned in over 30% of responses to this question.

"Making the high street pedestrianised, and allowing coffee shops to have seating out onto the pavement"

"Free parking not just for 2 hours on a Saturday but throughout the week"

"If it wasn't so expensive to get into Bedford on the bus I would go into town more"

"Better roads, less congestion"

"Better links between the town centre and the embankment"

Culture and Environment

This was mentioned in just over 10% of responses.

"A cleaner, more modern, more cared for environment. It looks dated and sad, not to mention dirty at the moment"

"If it was renovated with better taste and a more modern look"

"A more pleasing and modern appearance to the pedestrianised part of town, especially around the bus station and midland road"

"The town centre is not welcoming. There seems to be no ownership of the public spaces. There ought to be more street furniture, flowers, and a lot less mess/litter"

Community

This was mentioned in just under 1% of responses to the question.

"Networking website for every shop to enable interaction and a community feel"

"More community areas"

"More diversity and multi-cultural interaction"

"Great creativity to provide a warm, family community-based hub"

"Develop the community and have spaces and places to do things"

"The town centre should be seen as a community space. The focus must be on more than just retail"

Crime and Safety

Just under 2% of responses related to crime and safety for this question.

"Want a safer environment in the evening"

"More police presence"

"We must continue to deliver and support initiatives to provide assistance to rough sleepers"

Miscellaneous

Just under 2% of responses fell into this category.

"I feel if there was more 'place making' around the town that would create a more welcome atmosphere"

"Better promotion of the events"

"Urgently needs a USP"

Further consultations are currently being undertaken to look at specific projects that can improve Bedford town centre and these will be reflected in the local plan as it progresses. Additional information about the Town Centre Plan can be found on the Council's webpages.

The Covid-19 pandemic has shut down high streets across the country. This will accelerate consumer changes, with people having to or preferring to shop online as a result of the lock-down and social distancing, and there are likely to be lasting impacts that will be felt for years to come. The unprecedented nature of the pandemic means it is hard to predict what a new normality for high streets will look like once restrictions have been lifted.

At the time of publishing the Council is developing a Town Centre Recovery Plan to deal with the effects of the pandemic, working with local stakeholders and businesses and looking at short term measures to help the local economy.

Question 8

Do you have any further views to add to those listed in the Town Centre Plan (see Consultation Responses above)?

Climate change

Climate change is a fundamental concern for the local plan and the Council would like to enhance our current planning policies. Already the local plan requires new developments to:

- Use design, layout and orientation to maximise natural ventilation, cooling and solar gain, incorporating open space and trees.
- Reduce their emissions of carbon dioxide and use of water below the Building Regulation standard.
- Be designed to accommodate connection to a district heating network where possible.

The local plan also includes policies to guide the location of wind and solar energy development, and control the impact of renewable energy schemes. We intend to produce detailed guidance for developers on how the planning authority will be applying

these policies when dealing with planning applications. The guidance will ensure that new development contributes to meeting the challenges posed by our changing climate.

The Government made a commitment in the 2019 Spring Statement that by 2025 a new Future Homes Standard would be introduced for new build homes to be future-proofed with low carbon heating and world-leading levels of energy efficiency. The Government proposes to introduce a meaningful but achievable uplift to energy-efficiency standards in 2020 as a stepping stone to the introduction of the Future Homes Standard. The intention is to make new homes more energy efficient and to future-proof them in readiness for low carbon heating systems. The Government expects that an average home built to the Future Homes Standard will have 75-80% less carbon emissions than one built to current energy efficiency requirements. Once we hear the outcome of this consultation, we will consider how existing planning policies need to change.

Climate change can be influenced positively through measures which encourage the use of sustainable modes of transport, such as safe and green cycleways, dedicated busways or more innovative transport systems and modes. Incorporating within developments the infrastructure to support alternatives to the car means that they can be well designed resulting in high quality services which people will want to use.

Question 9

Do you agree that the Council should produce further guidance for developers on how to respond to climate change? If so, what should be included in it?

Question 10

The Government is developing new house-building standards to be implemented through building regulations. Is there any local evidence or need to go beyond national standards?

Question 11

What do you think would encourage people in Bedford borough to make greater use of sustainable modes of transport?

Environment

The Environment Bill, currently being considered in the House of Commons, includes a package of new duties to improve nature, such as the production of Local Nature Recovery Strategies and a 10% biodiversity net gain requirement on new development. Once we hear the outcome of any national policy change, we will consider if and how our existing local planning policies need to change.

The Local Plan 2030 contains robust policies relating to the environment. These policies will remain active, but the technical work that relates to these policies will be updated. This will include, for instance, a new Strategic Flood Risk Assessment to update the flood zones across the borough, where more recent data on the nature of flood risk has become available. Other studies to be prepared will include (but are not limited to):

- Landscape Character Assessment
- Open space standards review
- Playing pitch strategy
- Natural Capital Plan

Question 12

If you think that our existing planning policies to protect and enhance the natural environment fail to cover important national or local issues, please give details.

Health

National policy guidance included in [Healthy and safe communities](#) sets out the Government's advice for achieving healthier communities such as the availability of and access to open and green spaces. The Local Plan 2030 contains policies for the protection, enhancement and provision of green infrastructure which we consider are up to date.

It also contains a policy requiring the impact of developments on health to be assessed (health impact assessments). This policy is also considered to be up to date.

The national policy guidance discusses healthy food environments. It says "Planning can influence the built environment to improve health and reduce obesity and excess weight in local communities. Local planning authorities can have a role by supporting opportunities for communities to access a wide range of healthier food production and consumption choices. Planning policies and supplementary planning documents can, where justified, seek to limit the proliferation of particular uses where evidence demonstrates this is appropriate (and where such uses require planning permission)."

A key element of this relates to the proximity of food outlets to schools, and other locations for example where young people congregate. We are working with colleagues across the East of England, exploring this issue in more detail to determine whether a policy would be justified in Bedford Borough. The evidence results are awaited and will be taken into consideration when drafting the local plan.

Question 13

Is there anything else that is addressed in the new Government guidance that is not adequately covered by existing policies?

4. Call for sites

The new local plan will identify land for development by allocating sites. These sites will be for new housing, employment and other uses where required and will be in addition to sites already allocated in the Local Plan 2030 and the Allocations and Designations Local Plan (adopted 2013). It is important that the Council allocates a range of development sites that will maintain a five year supply of housing land. The plan must contain sites that will, alongside those already allocated, deliver relatively quickly as well as sites that cater for longer term requirements.

As part of this consultation, we are inviting landowners and other interested parties to propose sites to the Council that they think would be suitable for development. All sites proposed will be considered for inclusion in the plan.

How to submit a site

Because our list of sites submitted for potential inclusion in the Local Plan 2030 is now over five years' old, we are asking that any previously submitted sites that are still felt to be suitable for development are resubmitted at this time with updated information and data. This will allow us to assess all of the potential sites on a level playing field basis.

If you know of a site that may have development potential, or if you are a landowner, business or developer and have a site you would like to bring to our attention, please complete a site submission form. **We would prefer you to do this online using our consultation system** – the link can be found on our webpage www.bedford.gov.uk/localplanreview

Alternatively forms can be downloaded, completed and then emailed to planningforthefuture@bedford.gov.uk. Site forms can also be submitted by post if necessary (please use a stamp) to:

Planning Policy Team
Bedford Borough Council
Borough Hall
Cauldwell Street
Bedford
MK42 9AP

Please only send your site information using one method of communication (e.g. by email only).

Please submit your sites to us by 5pm on Friday 14th August 2020

What happens next?

Site submissions will be published on our website in due course. All sites submitted will go through a robust assessment to see whether they are deliverable and developable. Along with this assessment the selection of sites for inclusion in the plan will depend on the strategy chosen and on the findings of various other technical studies (e.g. the Strategic Flood Risk Assessment). However, it is likely that not all sites submitted for consideration will be needed or suitable.

The site submission form includes questions relating to the type of development proposed, any known constraints to delivery, whether a suitable access is present, and an indicative start date for development.

If the requested information is not provided we will not be able to complete a robust technical assessment and the site will not be considered for allocation.

What sites we are looking for and where?

National planning policy requires the Council to have a five-year supply of deliverable sites and the local plan must also show where development will be located over 15 years from when the plan is adopted.

The Council must allocate a mix of sites including **smaller sites of one hectare or less** to meet some of its development needs. We are therefore interested in a **wide range of sites in sustainable, connected areas**. We will **prioritise the regeneration of brownfield sites**.

Given the level of development we need to accommodate, we are also interested in proposals for **new settlements**.