



Local Plan 2040

Have Your Say on the Future of Your Borough

DUTY TO COOPERATE POSITION STATEMENTS

APRIL 2022



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1.0 Introduction

This statement outlines the way Bedford Borough Council has cooperated with neighbouring Local Authorities and other key partners to plan for strategic and cross boundary matters during the preparation of the Bedford Borough Local Plan 2040 ('Local Plan').

Proper planning for many matters requires cross boundary working. It is not the purpose of this paper to document every discussion and all the joint working that has taken place to produce the Local Plan. Rather, it focuses on the key strategic matters where strategic cooperation has been and remains crucial to facilitating sustainable development. For Bedford, these are considered to be:

- Development needs and distribution
- Infrastructure including transport

The 'Duty to Cooperate'

The duty to cooperate was introduced by section 33A of the Planning and Compulsory Purchase Act 2004¹ and the Localism Act 2011. It places a legal duty on local planning authorities, county councils and prescribed public bodies to work together on strategic cross boundary matters.

The Localism Act states that in particular the 'duty' requires that engagement should occur constructively, actively and on an ongoing basis during the plan making process and that regard must be given to the activities of other authorities where these are relevant to the local planning authority in question. The National Planning Policy Framework 2019 (NPPF) includes a specific section on maintaining effective cooperation (Paragraphs 24-27), and two of the four tests of soundness of local plans (Paragraph 35) directly related to the Duty to Cooperate. Plans must be:

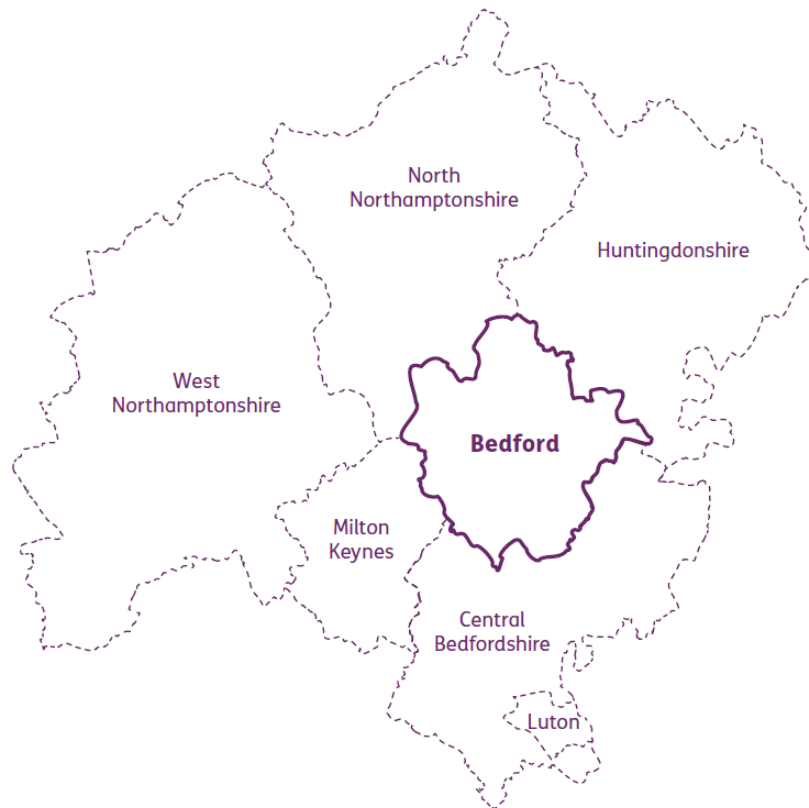
Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

Effective – deliverable over the plan period, and based on effective joint working on crossboundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground

2.0 Strategic Geography

The borough bounds North Northamptonshire to the north, Huntingdonshire to the east, Central Bedfordshire to the south and Milton Keynes to the west.

Bedford Borough Council **Duty to Cooperate Neighbouring Districts**



Parties involved

Central Bedfordshire Council

Huntingdonshire Council (Cambridgeshire County Council highways)

Luton Council

Milton Keynes Council

North Northamptonshire

Our aim is to produce more detailed statements with:

Anglian Water

Environment Agency

Historic England

Internal Drainage Board

Local Nature Partnership

National Highways

Natural England

NHS CCG

3.0 Strategic Issues

Strategic issues have been defined with reference to NPPF Para 20. A list of strategic matters has been considered at each duty to cooperate meeting. Each matter has been identified as either:

- A strategic matter which requires ongoing engagement;
- A strategic matter that may require ongoing engagement; or
- A strategic matter that is not envisaged to require ongoing engagement.

At the current stage of plan preparation, which is the publication of the Plan for Submission for consultation, our neighbours and partners are yet to have sight of the detail contained in the plan's policies and they do not know which sites are proposed for allocation.

Following publication of the plan and the receipt of representations the Council will be able to identify more specifically any strategic issues, matters later agreed and any outstanding matters which are not agreed by the time the local plan is submitted for Examination. For the moment this document sets out the potential strategic cross boundary matters with each party and, where relevant, more detailed cooperation.

4.0 Neighbouring authorities

Summary Table all neighbouring authorities

Strategic matter that requires ongoing engagement;

Strategic matter that may require ongoing engagement;

Strategic matter that is not envisaged to require ongoing engagement

Strategic Matter	CBC	Hunts	Luton	MK	NNC
Housing provision (including any identified unmet need from neighbouring authorities)					
Climate Change					
Education					
Employment provision					
Green Infrastructure					
G&T and TSP					
Healthcare					
Town Centres					
E-W Rail					
Rail infrastructure					
Transport					
Infrastructure Water resources, water quality, flood risk, telecoms, security, waste management					

Central Bedfordshire Council

This Officer Position Statement represents the discussions held so far between Bedford Borough Council and Central Bedfordshire Council in respect of the Local Plan 2040. It is intended to inform the Inspector and other interested parties about areas of discussion in relation to the Bedford Borough Local Plan 2040, so far. It is intended to provide a brief summary of some of the key strategic matters that have been discussed. It is not intended to be exhaustive. It should also be noted that this statement has been prepared at a stage in the process, where Central Bedfordshire officers have not yet been sighted on the pre-submission plan being put forward by Bedford Borough Council, and so are not aware of the sites being proposed (referred to as 'the spatial strategy' in the table below). As such, Central Bedfordshire may wish to raise issues beyond those previously discussed, at future Duty to Co-operate meetings. This statement will be updated following the Plan for Submission consultation.

At various stages of the plan's preparation the Council has engaged with Central Bedfordshire Council and the parties have met on the following dates:

10th September 2020

6th December 2021

28th February 2022 (Highways)

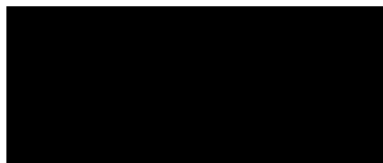
Strategic Matters

Strategic matter that requires ongoing engagement; strategic matter that may require ongoing engagement; strategic matter that is not envisaged to require ongoing engagement		Likely to have a significant impact?
Housing provision (including any identified unmet need from neighbouring authorities)	Part of the Oxford-Cambridge Arc and the potential need to provide an uplift in housing requirements to meet the Arc will require further cooperation. Subject to the location of housing development further cooperation will be required. The location and number of homes being provided will also have implications in relation to other strategic duty to co-operate matters, such as transport, healthcare and education.	Yes
Climate Change	Addressing climate change issues would benefit from further cooperation subject to the Borough Council's plan approach to climate change and renewable energy being determined.	

Education	Subject to the spatial strategy further cooperation on education might be required. Both authorities are working closely with respective property and education colleagues.	
Employment provision	Subject to the spatial strategy further cooperation may be necessary. This will also have implications in relation to other duty to co-operate matters, such as transport.	Yes
Green Infrastructure	Cooperation might be required if there are any cross-boundary impacts on biodiversity assets including green infrastructure.	
G&T and TSP	Cooperation may be required in respect of Gypsies and Travellers and Travelling Showpeople	
Healthcare	Subject to the spatial strategy further cooperation on health might be required.	
Town Centres	Subject to the spatial strategy further cooperation in terms of retail and leisure provision may be necessary.	Yes
E-W Rail	Although precise route of EWR is yet to be decided, there will be opportunities and a need for further cooperation.	
Rail infrastructure		
Transport infrastructure	Subject to the spatial strategy further cooperation will be necessary in relation to associated transport issues. Central Bedfordshire Council have raised concerns around transport mitigation and the capacity of key routes and junctions, which are yet to be resolved.	Yes
Environment	Given the joint working on cross-boundary projects, such as the Forest of Marston Vale SPD, there will be a need for further cooperation.	

Signed on behalf of Central Bedfordshire Council

On 6th April 2022



Caroline Danby

Head of Strategic Growth

Signed on behalf of Bedford Borough Council



Gill Cowie, Manager for Planning and Housing Strategy

6.4.22

Huntingdonshire Council

This Officer Statement of Common Ground position statement represents the shared view of Bedford Borough Council and Huntingdonshire Council in respect of the Local Plan 2040 to date. It is intended to inform the Inspector and other interested parties about the areas of agreement in relation to the Bedford Borough Local Plan 2040. This statement will be updated following the Plan for Submission consultation.

At various stages of the plans preparation the Council has engaged with Huntingdonshire Council and the parties have met on the following dates:

28th September 2020

13th May 2021

8th December 2021

13th April 2022 (forthcoming at date of signing)

Strategic matter that requires ongoing engagement; strategic matter that may require ongoing engagement; strategic matter that is not envisaged to require ongoing engagement		Likely to have a significant impact?
Housing provision (including any identified unmet need from neighbouring authorities)	Part of the Oxford-Cambridge Arc and the potential need to provide an uplift in housing requirements to meet the Arc will require further cooperation. Subject to the location of housing development further cooperation will be required.	Potential
Climate Change	Addressing climate change issues would benefit from further cooperation however the plans approach to climate change and renewable energy has not yet been determined.	
Education	Subject to the spatial strategy further cooperation on education might be required.	
Employment provision	Subject to the spatial strategy further cooperation may be necessary.	

Green Infrastructure	Cooperation might be required if there are any cross-boundary impacts on biodiversity assets including green infrastructure.	
G&T and TSP	Cooperation may be required in respect of Gypsies and Travellers and Travelling Showpeople	
Healthcare	Subject to the spatial strategy further cooperation on health might be required.	
Town Centres	Subject to the spatial strategy further cooperation in terms of retail and leisure provision may be necessary.	
E-W Rail	Although precise route is not yet set there will be opportunities and a need for further cooperation.	Potential
Rail infrastructure		
Transport	Subject to the spatial strategy further cooperation will be necessary in relation to associated transport issues.	Potential
Infrastructure Water resources, water quality, flood risk, telecoms, security, waste management	Subject to the spatial strategy taken further cooperation might be required if there are any cross-boundary impacts.	

Signed on behalf of Huntingdonshire District Council



01 April 2022

Clare Bond, Planning Policy Team Leader

Signed on behalf of Bedford Borough Council



Gill Cowie, Manager for Planning and Housing Strategy

4.4.22

Luton Council

This Officer Statement of Common Ground position statement represents the shared view of Bedford Borough Council and Luton Council in respect of the Local Plan 2040 to date. It is intended to inform the Inspector and other interested parties about the areas of agreement in relation to the Bedford Borough Local Plan 2040. This statement will be updated following the Plan for Submission consultation.

At various stages of the plan's preparation the Council has engaged with Luton Council and the parties have met on the following dates:

4th September 2020

22nd February 2022

Strategic matter that requires ongoing engagement; Strategic matter that may require ongoing engagement; Strategic matter that is not envisaged to require ongoing engagement		Likely to have a significant impact?
Housing provision (including any identified unmet need from neighbouring authorities)	Part of the Oxford-Cambridge Arc and the potential need to provide an uplift in housing requirements to meet the Arc will require further cooperation. Subject to the location of housing development further cooperation will be required.	Potential
Climate Change	Addressing climate change issues would benefit from further cooperation.	
Education	Not considered a strategic cross boundary issue.	
Employment provision	Subject to the spatial strategy further cooperation will be necessary.	
Green Infrastructure	Cooperation might be required if there are any cross-boundary impacts on biodiversity assets including green infrastructure.	
G&T and TSP	Cooperation may be required in respect of Gypsies and Travellers and Travelling Showpeople	

Healthcare	Not considered a strategic cross boundary issue.	
Town Centres	Not considered a strategic cross boundary issue.	
E-W Rail	Not considered a strategic cross boundary issue.	
Rail infrastructure		
Transport	Subject to the spatial strategy further cooperation may be necessary in relation to associated transport issues.	
Infrastructure Water resources, water quality, flood risk, telecoms, security, waste management	Subject to the spatial strategy taken further cooperation might be required if there are any cross-boundary impacts.	

Signed on behalf of Luton Council



Sue Frost. Service Director, Sustainable Development

Signed on behalf of Bedford Borough Council



Gill Cowie, Manager for Planning and Housing Strategy

31.3.22

Milton Keynes Council

This Statement of Common Ground position statement represents the shared view of Bedford Borough Council and Milton Keynes Council in respect of the Local Plan 2040 to date. It is intended to inform the Inspector and other interested parties about the areas of agreement in relation to the Bedford Borough Local Plan 2040. This statement will be updated following the Plan for Submission consultation.

At various stages of the plan's preparation the Council has engaged with Milton Keynes Council and the parties have met on the following dates:

3rd November 2020

19th January 2022

Strategic matter that requires ongoing engagement; Strategic matter that may require ongoing engagement; Strategic matter that is not envisaged to require ongoing engagement		Likely to have a significant impact?
Housing provision (including any identified unmet need from neighbouring authorities)	Part of the Oxford-Cambridge Arc and the potential need to provide an uplift in housing requirements to meet the Arc will require further cooperation. Subject to the location of housing development further cooperation will be required.	Potential
Climate Change	Addressing climate change issues would benefit from further cooperation.	
Education	Subject to the spatial strategy further cooperation on education might be required.	
Employment provision	Subject to the spatial strategy further cooperation will be necessary.	Potential
Green Infrastructure	Cooperation might be required if there are any cross-boundary impacts on biodiversity assets including green infrastructure.	
G&T and TSP	Cooperation may be required in respect of Gypsies and Travellers	
Healthcare	Subject to the spatial strategy further cooperation on health might be required.	
Town Centres	Subject to the spatial strategy further cooperation in terms of retail and leisure provision may be necessary.	

E-W Rail		Potential
Rail infrastructure	Subject to the spatial strategy further cooperation will be necessary. Possibly in relation to station patronage.	
Transport	Subject to the spatial strategy further cooperation may be necessary in relation to associated transport issues. 3	
Infrastructure Water resources, water quality, flood risk, telecoms, security, waste management Bedford-MK Waterway	Subject to the spatial strategy taken further cooperation might be required if there are any cross-boundary impacts.	

Signed on behalf of Milton Keynes Council



Paul Thomas – Director Planning and Placemaking

31 March 2022

Signed on behalf of Bedford Borough Council



Gill Cowie, Manager for Planning and Housing Strategy
6.4.22

North Northamptonshire Council

This Officer Statement of Common Ground position statement represents the shared view of Bedford Borough Council and North Northamptonshire Council in respect of the Local Plan 2040 to date. It is intended to inform the Inspector and other interested parties about the areas of agreement in relation to the Bedford Borough Local Plan 2040. This statement will be updated following the Plan for Submission consultation.

At various stages of the plan's preparation the Council has engaged with North Northamptonshire Council and the parties have met on the following dates:

20th May 2020 (East Northants and NNJPU)

1st September 2020 (East Northants and NNJPU)

30th July 2021 (NNC)

14th December 2021 (NNC)

Strategic Matters

Strategic matter that requires ongoing engagement; strategic matter that may require ongoing engagement; strategic matter that is not envisaged to require ongoing engagement		Likely to have a significant impact?
Housing provision (including any identified unmet need from neighbouring authorities)	Part of the Oxford-Cambridge Arc and the potential need to provide an uplift in housing requirements to meet the Arc will require further cooperation. Subject to the location of housing development further cooperation will be required.	Potential
Climate Change	Addressing climate change issues would benefit from further cooperation subject to the Borough Council's plan approach to climate change and renewable energy being determined.	
Education	Subject to the spatial strategy further cooperation on education might be required.	

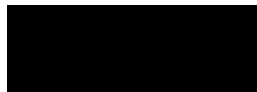
Employment provision	Subject to the spatial strategy further cooperation may be necessary.	
Green Infrastructure	Cooperation might be required if there are any cross-boundary impacts on biodiversity assets including green infrastructure.	
G&T and TSP	Cooperation may be required in respect of Gypsies and Travellers and Travelling Showpeople.	
Healthcare	Subject to the spatial strategy further cooperation on health might be required.	
Town Centres	Subject to the spatial strategy further cooperation in terms of retail and leisure provision may be necessary.	
E-W Rail	Although precise route is not yet set there will be opportunities and a need for further cooperation.	
Rail infrastructure		
Transport infrastructure	Subject to the spatial strategy further cooperation will be necessary in relation to associated transport issues.	Potential
Environment	Due to the cross-boundary nature of Green Infrastructure and the Upper Nene Valley Gravel Pits SPA there will be a need for further cooperation. A Statement of Common Ground has been signed and joint technical work commissioned in respect of the SPA.	Potential

Signed on behalf of North Northamptonshire Council



Simon Richardson – Interim Planning Policy Manager 7.4.22

Signed on behalf of Bedford Borough Council



Gill Cowie, Manager for Planning and Housing Strategy

7.4.22

5.0 Other bodies

Anglian Water

This Statement of Common Ground / position statement represents the shared view of Bedford Borough Council and Anglian Water in respect of the Local Plan 2040. It is intended to inform the Inspector and other interested parties about the areas of agreement in the Local Plan's - 'the Plan' -evidence base.

At various stages of the plan's preparation the Council has engaged with Anglian Water on the development of policies and site allocations that are relevant to the water supply and recycling, and the parties have met on the following dates:

17th November 2021

18th January 2022

16th February 2022

18th March 2022

So far Anglian Water have:

- Undertaken a RAG summary provided for the sites from Water supply colleagues
- Undertaken a Headroom assessment for each of the Water Recycling Centre which would likely serve the sites BBC are looking to allocate
- Provided a summary of the position on water supply, water recycling and flooding (below) which forms the basis to a SoCG pre-submission. It provides a summary of the more detailed information set out in the Infrastructure Delivery Plan, which will require an update later this year with information from the Anglian Water WRMP (following on from the WRE Regional Plan) and DWMP when they are consulted on from late summer through the autumn.
- Identified some of the proposed allocation sites as amber. The policy for these sites should include early engagement with Anglian Water by developers to ensure sufficient lead in time to secure land and network upgrades. Resolution would be a couple of years and those sites are considered 'deliverable' if all other matters had been resolved.

- Confirmed that with regard to water recycling the Bedford WRC is already at flow capacity. Investment is being planned by colleagues and clarification on this will be provided through the Reg 19 consultation however it is considered that this will be resolved before the sites are formally allocated.

Anglian Water has provided the following a Pre-consultation position statement

Water supply

The Anglian region is classed as 'severely water stressed' by the Environment Agency. The position in the west of the region including Bedford is significantly better than in the east although the Ruthamford Water Resource Zone would experience water shortages by 2040 without Anglian Water supply and Council demand side interventions. Bedford benefits from supply from Grafham Water as well as the existing ability to transfer water via the strategic network in the west of the region. The supply is also principally from river and reservoir rather than ground water abstraction and so less likely to be reduced through sustainability reductions. As with all of the Anglian region there is still a need to reduce water demand to ensure that we do not have to build more new infrastructure than needed – with its impact from embedded carbon and cost to customers through bills – or in moving more water than is required which also has climate change and economic impacts.

The sites proposed in the Plan could all be supplied with water including through enhancements to the distribution network. Works to provide the connections and capacity at some of those sites may take two years or more depending on reaching agreement with landowners. Those new links though are not considered to be a limiting factor on when allocations would be deliverable or developable.

The employment allocations at St Neots and Wyboston would at the pre -application stage need to consider any design and protection measures required to safeguard nearby water abstraction points. The availability of water and required enhancements to the water supply network to serve the employment allocations would be matters for pre-application engagement with Anglian Water. This is because the quantity of water required varies significantly between a food processing use and logistics centre, for example.

Water recycling

The majority of homes planned up to 2040 are within the Bedford wastewater treatment catchment. This includes allocations at the Wixams, Little Barford and Kempston Hardwick which have existing Water Recycling Centres (WRC) within the Bedford catchment. On the basis of the current information those sites would be served by the Bedford WRC rather than through expanding local capacity. The use of available capacity and seeking to invest in fewer locations to serve growth reduces the embedded carbon from construction and is usually more efficient financially. Expanded capacity can then be provided to meet the planned for overall level of growth rather than reacting to the commencement and build out rates of multiple sites. The focus of growth on Bedford therefore enables environmentally and financially sustainable growth – from water infrastructure considerations view - in the wider Bedford area. To put this another way there isn't significant capacity available at other WRC/

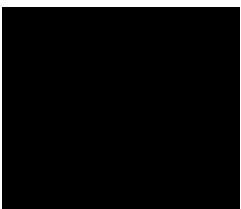
settlements which could provide for the required number of new homes without those WRC also having investment to increase capacity. A number of those WRC may provide for limited growth through windfall sites during the plan period.

The Bedford WRC as at its current flow limits and Anglian Water is working with the Environment Agency to bring forward a solution in AMP7 (2020-25) that will provide capacity to support growth up to the end of AMP10 (2035-40). That investment will be in- train before the new Local Plan is adopted and the new allocations come forward from 2025 onwards. In terms of delivery the quantity and location of allocations can be served by planned future water recycling treatment capacity and are developable during the plan period. The individual sites would need to show deliverability through agreeing requisite network capacity improvements and local connections when sites come forward at pre-planning application stage. Those sites would also be required to show that options for greywater and rainwater harvesting have been fully utilised.

Surface Water and Flooding

Anglian Water can advise that none of the allocations give rise for concern from an historical surface water flooding perspective. Provided those developments follow Anglian Water, LLFA and EA advice on using sustainable drainage systems (SuDS) they should be able to demonstrate no additional surface water flooding risk including no connections to the public sewer network and providing for allowances for climate change.

Signed on behalf of Anglian Water



Darl Sweetland - Spatial Planning Manager

6 April 2022

Signed on behalf of Bedford Borough Council



Gill Cowie, Manager for Planning and Housing Strategy

6.4.22

Environment Agency

Bedford Borough Council has been working with the Environment Agency in respect of the Local Plan 2040. The Environment Agency expressed the preference to be consulted on specific sites once a shortlist had been drawn up by the council. Following the completion of a level 1 SFRA and the commissioning of level 2 SFRA, a confidential list of preferred sites was sent to the Agency in November 2021.

They Environment Agency has:

- Provided a RAG assessment of the preferred allocation sites in relation to whether an SFRA 2 was needed, and identified for each of the sites the flood risk by zone.
- Made a significant contribution to the Infrastructure Delivery Plan including providing detailed comments on the flood defences section.

Bedfordshire and River Ivel Internal Drainage Board

Bedford Borough Council has been working with the Bedfordshire and River Ivel Internal Drainage Board (IDB) in respect of the Local Plan 2040. At various stages of the plan's preparation the Council has engaged with the IDB and the parties have met on the following date(s):

4th February 2022

So far the IDB have:

- Provided detailed comments on the preferred allocation sites.
- Made a significant contribution to the Infrastructure Delivery Plan.

Local Nature Partnership

Bedford Borough Council has been working with the Local Nature Partnership in respect of the Local Plan 2040. At various stages of the plan's preparation the Council has engaged with the Local Nature Partnership and the parties have met on the following dates:

18th February 2021

18th May 2021

23rd July 2021

So far the Local Nature Partnership have:

- Provided a response to the Draft Plan consultation.
- Provided assistance in relation to the Plan's approach to Natural Capital and eco-system services.
- Made a significant contribution to the Infrastructure Delivery Plan.

Natural England

Bedford Borough Council has been working with Natural England in respect of the Local Plan 2040. At various stages of the plan's preparation the Council has engaged with Natural England and the parties have met on the following dates:

15th October 2020

So far Natural England have:

- Provided a response to the Draft Plan consultation.
- Agreed the outputs from the Habitats Regulations Assessment of the Plan for Submission.
- Made a significant contribution to the Infrastructure Delivery Plan.

Historic England

This Statement of Common Ground position statement represents the shared view of Bedford Borough Council and Historic England in respect of the Local Plan 2040 to date. It is intended to inform the Inspector and other interested parties about the areas of agreement in the Local Plan's detailed wording, supporting text and evidence base. This statement will be updated following the Plan for Submission consultation.

At various stages of the plans preparation the Council has engaged with Historic England on the development of policies and site allocations that are relevant to the historic environment, and the parties have met on the following dates:

10th November 2020

20th July 2021

10th November 2021

Historic England made comments to the draft plan in 2021 in relation to:

- The key sensitivities relating to the various growth options consulted on.
- Site assessment work undertaken
- Various sections of the draft plan text – see table below

The following tables set out the Council's proposed response to Historic England's comments to date.

Section	Support / Object	HE Reg 18 Comment	HE Suggested change	Council Action	HE Response
Vision	Object	Fifth paragraph: We welcome the reference to the need to respect and protect the boroughs built and wider historic environment. For greater consistency with the NPPF, we suggest that instead of valued you use the word 'enhanced'	Replace valued with 'enhanced' in line with NPPF	Valued changed to enhanced.	Agreed - Welcome change
Theme 4 Better Places	Support	We welcome reference in this theme to local landscapes, settlement character, and conservation and enhancement of the historic environment.,		Noted	-
5.2	Object	Include reference to the High Street Heritage Action Zone in Bedford.	Add reference to the Bedford High Street Heritage Action Zone	Reference has been added to paragraph 5.3.	Agreed - Welcome change

Bedford Borough Design Guide	Object	We welcome the preparation of a Design Guide. It would be helpful to mention the historic environment in paragraph 7.28. It would be helpful to have a specific policy in the Plan for the Design Guide to sit under. We have been consulted on the SEA for the Design Guide and look forward to commenting on the Design Guide itself as it emerges.	Mention historic environment in para 7.28. Include a policy in the Plan for Design Guide.	The Council is currently in the process of producing a Borough Wide Design Guide which will be adopted as SPD. The Guide will assist the application of existing development plan policies including Policy 28S Place-making, Policy 29 Design quality and principles and Policy 30 Impact of development – design impacts. The design guide is referenced in Local Plan 2040 text. The guide will be adopted as SPD and will therefore be a material consideration for all development.	Agreed and noted. SPD needs to relate to policy that will be retained.
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Tall Buildings and the skyline	Object	Given the growth pressures that will be experienced by Bedford over the coming years, we strongly recommend that the matter of Tall buildings and the skyline needs to be addressed in a new DM policy. We recommend that you commission a tall buildings study. See our advice note HEAN 4 and the consultation draft of HEAN 4. Any policy should indicate what considerations are needed for taller buildings, where buildings may or may not be appropriate etc. and in particular consider the impact on the historic environment. We would be happy to advise further regarding the detail of such a study.	Commission a Tall buildings and the skyline study. Include a new policy in the Plan for Tall Buildings.	The Council has included a policy regarding tall buildings in the Plan for Submission (Policy DM12) and will prepare an SPD to assist with the application of the policy.	Agreed approach. HE will comment on detailed policy wording of new policy at Reg 19.
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Landscape Character Assessment	Object	We welcome the section on Historic Landscape Character within the LCA (paras 2.15 – 2.84) which provides helpful context. However, we continue to request that the finer grained historic landscape characterisation is updated to better inform future development and growth options.	Update Historic Landscape Characterisation to inform future development and growth options.	The Landscape Character Assessment has recently been updated however the Council will consider updating Historic Landscape Characterisation work in future, subject to resources.	Agreed – welcome commitment to consideration of updating HLC, subject to resources. This will be a useful piece of work to inform future development across the borough.

Historic England Reg 18 comment	Council Action	HE response
Site Assessment We are pleased to note that a considerable degree of site assessment has already been undertaken in relation to the historic environment. These are set out in the Site Assessment pro-formas as well as the historic environment Excel spreadsheet. We welcome the additional table. This helps to ensure the process is both robust and transparent. To date, the assessment of sites is fairly high level and brief but provides a useful starting point, in particular helping to identify immediate showstoppers. We note that many of the sites are shown as amber and the table notes that further assessment in terms of significance, impact on that significance, potential mitigation	The Council's approach to the assessment of sites, the commissioning of Heritage Impact Assessments and outcomes in the form of criteria in allocation policies is set out in the Historic Environment Topic Paper. An up to date version of the spreadsheet will also been published as part of the evidence base.	Agreed. HE welcomes the preparation of HIAs. We are pleased that the outcomes will be included in policy criteria. HE looks forward to reviewing and commenting of the HIAs, policies and the spreadsheet when they are published.

and enhancements etc. will be needed. As we have discussed previously, further assessment will be needed of the sites. This further assessment, known as Heritage Impact Assessment (HIA) should follow the 5 step methodology set out in our advice note, HEAN 3 on Site Allocations in Local Plans		
Non-designated Heritage Assets Through discussion with Historic England the Council has included a policy in Local Plan 2040 which sets out a clear approach to identifying non-designated heritage assets to ensure such assets are given weight in the planning process.	The Council's approach is set out in the Historic Environment Topic Paper. Local Plan 2040 includes Policy DM10.	Agreed. We welcome the Council's discussions with HE on NDHA and new policy and Appendix.

Signed on behalf of Historic England



Debbie Mack, Historic Environment Planning Adviser

31.3.22

Signed on behalf of Bedford Borough Council



Gill Cowie, Manager for Planning and Housing Strategy

31.3.22

National Highways

Ongoing engagement between Bedford Borough Council and National Highways (formerly Highways England) has taken place throughout the plan's preparation. The parties have met on the following dates:

13/1/21

14/4/21

8/6/21

24/9/21

3/11/21

15/12/21

12/1/22 (With neighbouring authorities to discuss development in proximity to A421.)

2/2/22

9/3/22

National Highways has agreed the following Pre-consultation memorandum of understanding position statement.

1. Scope of the Memorandum

- 1.1 This memorandum of Understanding (MoU) has been prepared under the Duty to Co-operate requirements of the Localism Act 2011. It provides a position statement on the extent of co-operation and understanding between the parties in respect of preparation of the Bedford Borough Local Plan 2040 which will be submitted for examination in January 2023.
- 1.2 This MoU has been agreed by the following parties:
 - Bedford Borough Council (BBC)
 - National Highways (NH)
- 1.3 The MoU highlights the shared and common objective to identify and facilitate the necessary transport infrastructure to support the proposed Local Plan growth. The MoU is intended to set out the position of the signatory organisations and highlight the extent of agreement on strategic planning matters. The document will form part of the evidence base for the Local Plan Examination.
- 1.4 The parties set out in this MoU have co-operated on those matters of joint interest related to the development of the growth strategy proposed in the Local Plan 2040 in accordance with paragraphs 24 to 27 of the NPPF (2021).
- 1.5 Further ongoing liaison will ensure that this continuing requirement will be met and that local parties will work together to find solutions that will help support delivery of the Local Plan.

2. Background

- 2.1 Assuming appropriate approvals by Executive are achieved, the BBC Local Plan 2040 Plan for Submission will be placed on deposit for public consultation during June and July 2022. Following review of representations and the Local Plan will be submitted to the Secretary of State for independent examination in January 2023.
- 2.2 BBC's Transport Policy and Highway Development Control team (acting as the local highway authority) has provided advice and feedback on a range of transport infrastructure matters throughout the Local Plan process, including all consultation stages of the Local Plan to date and preparation of the BBC Infrastructure Delivery Plan (IDP).
- 2.3 The Council's transport model has been prepared on their behalf by AECOM who have also provided technical advice regarding the development of the spatial strategy.

- 2.4 NH (formerly Highways England) is the body responsible for the Strategic Road Network (SRN) which, in the case of Bedford Borough, includes the A421, A428 and A1 trunk roads. NH has been consulted at each stage of the Local Plan preparation process. It has also been consulted on the development and use of the BBTM transport model.

3. Agreed strategic priorities

- 3.1 It is agreed that the following matters represent the strategic priorities relating to transport matters and the delivery of growth in Bedford Borough. They were identified, discussed and agreed through a number of meetings and through correspondence.

Assessing and mitigating the effects of Local Plan growth on the highway network

- 3.2 BBC's Bedford SATURN based transport model was updated by their consultants Systra to be suitable to assess / model the impacts of growth planned in the Local Plan 2030 and the outcomes of this work informed the mitigation measures required. This model was however originally built in 2013 and so to understand the highway impacts of growth in the Local Plan 2040 a newer model ; the Bedford Borough Transport Model (BBTM) was necessary. This has been developed by AECOM.
- 3.3 The BBTM is a multi-modal transport model covering the borough and areas adjacent to the borough in neighbouring authorities. This model has been developed to assess the forecast impacts of growth set out in spatial scenarios for the new Local Plan for growth through to 2040, and to assess potential mitigation transport schemes to assist in delivering this growth. As part of this assessment, an initial set of mitigation measures was identified by Bedford Borough Council, which has since been supplemented by further interventions, following detailed interrogation of the modelling work undertaken. These additional proposed mitigation measures consider the forecast locations of delay and congestion within the highway network and are based on measures which BBC feel are 'deliverable' in the context of the proposed developments.
- 3.4 The assessment of deliverability included:
- existing constraints such as buildings, rivers and railways;
 - the potential for the scheme to be funded by the relevant infrastructure provider with or without a contribution from the proposed development (e.g. through S278 or S106 agreements or the Community Infrastructure Levy); and
 - whether the scheme could be delivered within the timescale of the development.
- 3.5 The results of this work are detailed in the following documents

Model Development (2020) Development of the Bedford Borough Transport Model (BBTM)	To be published alongside the Plan for Submission (Spring 2022) • Model Specification Report • Data Collection Report • Highway Local Model Validation Report • Public Transport Local Model Validation Report • Demand Model Development Report
Draft Local Plan Assessment (Autumn 2020) Assessment of four development scenarios (Grey, Pink, Yellow & Brown, Red & Orange, and Brown) including and excluding mitigation measures	Published in June 2021 as part of the Draft Local Plan Consultation • Draft Local Plan Assessment Summary Report • BBTM Draft Local Plan Assessment Report
Large Development Assessments (Spring 2021) Following the draft Local Plan assessment, assessment of potential developments along the A6 corridor (Twinwoods and Colworth) and around Black Cat (Dennybrook and Little Barford) including potential additional mitigation measures	Published in June 2021 as part of the Draft Local Plan Consultation • Assessment of New Settlements and the A6 • Assessment of New Settlement West of Wyboston • Assessment of New Settlements and the Black Cat
Emerging Preferred Options Assessment (Summer 2021) Assessment of four emerging preferred options (Options 2a to 2d) based on the Yellow development scenario including a proposed package of mitigation measures	To be published alongside the Plan for Submission (Spring 2022) • Assessment of Local Plan Options 2a-2d
Preferred Strategy Allocation Assessment (Winter 2021 / 2022) Assessment of potential allocation for the preferred strategy including and excluding mitigation measures and including iteration on allocations and mitigation	To be published alongside the Plan for Submission (Spring 2022) • Assessment of Local Plan Preferred Option

- 3.6 In January 2021 BBC provided NH with a Model Development document that included a Validation Report. The document presented model run outputs of emerging Local Plan growth scenarios on the highway network in the Bedford Borough and surrounding area and advised on potential mitigation interventions.
- 3.7 This MoU between BBC and NH confirms that the Bedford Borough Transport Model (BBTM) is an appropriate basis to understand the cumulative impact of the Local Plan growth and strategically assess the transport impacts of the Local Plan. The parties will continue to work together to assess specific impacts in more detail and agree the outcomes of the modelling, which will confirm the package of interventions to be included in the IDP required to support delivery of the plan.

National Highway Funding – Road Investment Strategy

- 3.8 The SRN is the road network operated, developed and maintained by National Highways in England and is formed of motorways and the main 'A' roads. Major infrastructure schemes on the SRN are delivered by National Highways through the government's Road Investment Strategy (RIS) process. The RIS sets out a long-term strategic vision for the SRN, specifies the performance standards that NH must meet, and details planned enhancement schemes that are expected to be built. The RIS provides the opportunity to make a significant contribution to the delivery of sustainable economic growth, and helps create the conditions that support its realisation through the local plan development process
- 3.9 The RIS is split into five year funding cycles and the period RIS3 will cover 2025 – 2030. There are three stages of development: a research phase (including consultation); a decision phase; and a mobilisation phase. The research stage for RIS3 is being undertaken in 2021 and 2022, and involves three significant processes for gathering evidence:
- Route Strategies: National Highways will refresh existing route strategies for RIS3. These explore current performance and future pressures on the SRN. This has already begun, and a baseline review of all interventions identified by National Highways already completed. The next two stages consist of stakeholder engagement (2022) and a gap analysis exercise (2022 – 2023).
 - Strategic Studies: these are intended to investigate the complex problems identified by the Route Strategies which face the road network and identify possible interventions which may need to be implemented in RIS3 and future periods. To inform an understanding of the issues, NH has been commissioned by co-project sponsors the Department for Transport (DfT) and England's Economic Heartland (EEH), to undertake a study of the Oxford to Cambridge Arc Road connectivity. The purpose of the study is to identify where investment in key parts of the region's road network is required in order to support existing identified locally planned growth in the area and alleviate existing issues and constraints on the network. The study will consider the need for interventions on the SRN. Any funding required to develop options further would need to be sourced through the appropriate channels for each respective intervention in line with their size and scale.
 - Pipeline Schemes: these are projects identified through NH's programme of strategic studies, route strategies, specific areas of research and work with stakeholders, listed in RIS2 (2020-2025) which could be considered for funding in RIS3. Not all schemes in the pipeline will progress to construction.
- 3.10 NH will provide an Initial Report, which takes the outcomes of the strategic studies and work it has undertaken, to set out its views and recommendations to DfT on the key challenges and investment priorities for the SRN. The level of Government funding that will be made available for the next roads period, and the list of schemes identified for delivery, won't be known until late in the RIS2 period. Given typical scheme development and construction timescales, any major improvements identified to facilitate economic growth in the SRN corridors through the Borough are unlikely to be completed before the end of RIS3 at the earliest

Joint working with neighbouring authorities

- 3.11 Joint working between Central Bedfordshire, Cambridgeshire and Huntingdonshire is being explored particularly in relation to the potential cumulative impact of growth focused in the A1 corridor and the potential for coordination of road and other schemes. The parties will continue to work together on this matter.
- 3.12 All parties recognise the potential need to plan for the longer term. Both Bedford Borough and Central Bedfordshire Councils are aware of the potential for strategic development in the vicinity of the A1 / A428. The planned construction of the A428 Black Cat to Caxton Gibbet scheme offers the infrastructure to facilitate strategic growth in that area, which could be enhanced by additional accessibility if an additional junction were to be constructed on the new road.
- 3.13 NH confirms that there is space and scope for an additional junction on the new A428 Black Cat to Caxton Gibbet road to the east of the proposed Black Cat Interchange. However, the need to accommodate future cumulative planned growth from the planning authorities with a new junction is yet to be established. The submission of Local Plan 2040 provides some certainty to planned growth within the Bedford Borough area.
- 3.14 The parties to this MoU agree that where local road network improvements, such as those identified in the Infrastructure Delivery Plan, are required to mitigate the effects of development of the Local Plan growth sites, funding for these will be sought in the first instance through Section 106 obligations or Section 278 agreements with the appropriate developers. Where the need for a particular mitigation measure is not attributable to a single development, pooled Section 106 contributions will be used. Alternatively, BBC may be willing to contribute some of its pooled resources if that increases the value for money of a strategic scheme which also benefits the local highway network

Achieving modal shift

- 3.15 The parties to the MoU acknowledge that, in the future, opportunities to increase highway capacity may be limited and potentially unviable, given the availability of funding, land availability and the risk of transferring congestion problems to adjacent parts of the highway network. As such it is important that opportunities are taken in the first instance to reduce the need to travel and deliver modal shift through sustainable transport infrastructure, in order to minimise the need for significant physical highway interventions.
- 3.16 BBC is part of the England's Economic Heartlands (EEH) Sub-National Transport Body. Within Bedford, sustainable growth provides the context to deliver transport improvements for existing and new communities which reflect the ambitions of the EEH Transport Strategy. In working with landowners to prepare masterplans and Supplementary Planning Documents for the strategic growth sites

allocated in the Local Plan, where relevant, BBC will work with NH to ensure that opportunities for sustainable development are maximised.

4. Commitment to Future Co-operation

- 4.1 BBC and NH are committed to working together to facilitate the necessary transport infrastructure to support the housing growth identified in the Local Plan. The parties will continue to work together to ensure the Duty to Cooperate is met, including through implementation of the Local Plan and any future review.

Signed on behalf of National Highways



12.4.22

Eric Cooper, Spatial Planning Manager

Signed on behalf of Bedford Borough Council



12.04.22

Gill Cowie, Manager for Planning and Housing Strategy

Bedfordshire Hospitals NHS Foundation Trust/ Bedfordshire, Luton and Milton Keynes CCG

Ongoing engagement between Bedford Borough Council and CCG has taken place throughout the plan's preparation. The parties have met on the following dates:

22nd October 2021

2nd November 2021

23rd November 2021

21st December 2021

19th January 2022

Both the NHS Foundation Trust and CCG have:

- Provided a response to the Draft Plan consultation.
- Made a significant contribution to the Infrastructure Delivery Plan.