

Bedford Borough Council – Executive

Date of Meeting: 27 APRIL 2022

Report by: The Mayor and Chief Officer for Planning, Infrastructure & Economic Growth

Subject: Local Plan 2040

1. EXECUTIVE SUMMARY

- 1.1 The purpose of this report is to advise Members of the main issues raised during the Draft Plan: Strategy Options and Draft Policies consultation (Regulation 18) that took place from June 2021 to September 2021 and how that consultation has influenced the final draft local plan. The report also presents an overview of the Local Plan 2040 ‘Plan for Submission’ and its evidence base, in particular the development strategy on which the plan is based, and outlines the purpose and scope of the forthcoming consultation including the next steps for the plan.

2. RECOMMENDATIONS

2.1 Executive is recommended to consider, and if satisfied:

- (a) Agree the Officer responses to the consultation comments received during the Draft Plan: Strategy Options and Draft Policies consultation June 2021 (Appendix A).**
- (b) Subject to any amendments Executive may wish to make, agree the Local Plan 2040 ‘Plan for Submission’ (Appendix B) and its evidence base documents (Appendix C) for the purposes of public consultation, and agree that the evidence base documents listed at paragraph 5.67 will be the subject of a further Executive Decision prior to the commencement of the consultation.**
- (c) Authorise the Chief Officer Planning, Infrastructure and Economic Growth to make essential minor textual changes to the Draft Local Plan 2040 ‘Plan for Submission’ and evidence base documents which support the plan.**

3. REASONS FOR RECOMMENDATIONS

3.1 To enable the preparation of the Local Plan 2040 to progress in accordance with the recently updated Local Development Scheme.

4. IMPLICATIONS

Legal Issues

4.1 One of the core planning principles set out in the National Planning Policy Framework is that planning should be genuinely plan-led and that plans should be kept up to date. Plan preparation will need to be undertaken in the context of the Framework, supporting guidance and the local plan system introduced by the Localism Act 2011. The Local Plan 2040 must also reflect the preparation of Neighbourhood Plans and the part they play in delivering the development plan for the borough.

4.2 As described in the Planning and Compulsory Purchase Act 2004 a local plan is a local development document. The preparation of local development documents must be carried out in accordance with Section 19 of this Act and the Town and Country Planning (Local Planning)(England) Regulations 2012. Clear stages of plan making include:

- Preparation of a local plan (Regulation 18) – requiring local people and consultation bodies to be invited to make representations about what the local plan ought to contain
- Publication of a local plan (Regulation 19) – requiring documentation to be made available prior to submission of the local plan for examination
- Representations relating to a local plan (Regulation 20) – allowing the submission of representations to the planning authority about a local plan that the authority propose to submit for examination
- Submission of documents to the Secretary of State for examination (Regulation 22)
- Independent examination (Regulation 24)
- Adoption of a local plan (Regulation 26)

4.3 This consultation will comply with Regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012. It is more commonly known as the publication stage of the plan making process.

Policy Issues

- 4.4 Local plans set a vision and framework for future development to meet local needs and opportunities and to reflect national priorities, particularly in relation to housing, the economy, identification and delivery of infrastructure and protection of the environment. They are a critical tool to positively guide development decisions.
- 4.5 National planning policy is contained in the National Planning Policy Framework (NPPF). It explains that the planning system should be genuinely plan-led and that plans should, amongst other things, provide a platform for local people to shape their surroundings (para 15). Plans should be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees (para 16).
- 4.6 The NPPF expects local planning authorities to review plans to assess whether they need updating at least once every five years, and then update them as necessary. Relevant strategic policies will need updating at least once every five years if the applicable local housing need figure has changed significantly (para 33).
- 4.7 The Bedford Borough Local Plan 2030 was adopted in January 2020. To be found 'sound' the examining Inspectors recommended a modification by way of a new policy (Policy 1) to explain that an updated or replacement plan will be submitted for examination no later than three years after the adoption of the Local Plan 2030. The explanation for this is given in paragraphs 15 to 19 of the Inspectors' Report which refer to the need to plan for longer term requirements, in particular as they relate to the Oxford to Cambridge Arc, as soon as possible. An early review also offered the opportunity for intervention should neighbourhood plans not progress sufficiently quickly.
- 4.8 In accordance with this local policy the next local plan must be submitted for examination by January 2023. If this is not achieved, the policies in the Local Plan 2030 which are most important for the determination of planning applications for new dwellings will be deemed to be out of date in accordance with paragraph 11 d) of the NPPF 2021. In other words, the effect will be the same as if we were to have less than a five-year housing land supply.
- 4.9 The Local Plan 2030 was prepared under a locally based regime for determining the number of dwellings to be built in the borough known as objectively assessed housing need. This approach produced a minimum requirement of 970 dwelling completions per annum. The new local plan must be based on a different regime known as local housing need which uses a nationally set calculation often referred to as the Standard Method. At the present time, and following the publication of new national affordability data in March 2022, this requires 1,355 dwelling completions a year; a significant 40% increase in the number of dwellings which must be balanced with land allocations to provide associated jobs, plus new and improved infrastructure.
- 4.10 The Local Plan 2040 will align closely with other Council key plans and strategies, for example the Council's new Corporate Plan 'Together Bedford Borough' 2022 – 2026 and the Growth Plan 2018 - 2022.

Resource Implications

- 4.11 The cost of preparing the Local Plan 2040 has been and will continue to be met within existing budgets and from a call on the Plans and Strategies Reserve. Staff resources will be drawn from other teams where appropriate to help with the planning and administration of the consultation process.

Risk Implications

- 4.12 When the draft Local Plan 2030 was modified to include the plan review policy, it was on the basis that the published timetable for the progression of the Oxford Cambridge Arc project would be adhered to. However, the first consultation on priorities for the Arc slipped from 2019 to 2021 meaning that there has been no strategic guidance (even in draft) to inform the preparation of this local plan, the timetable for which is fixed. Despite this delay to the Arc Spatial Framework, Councils in the Arc are being pressed by DLUHC to carry on with plan making activity.
- 4.13 Failure to adhere to the local plan timetable would bring with it significant consequences for the borough as explained in 4.8 above so the Council has little option but to carry on with the preparation of the Local Plan 2040. There is a risk however that the local plan will be out of kilter with the Arc Spatial Framework if and when it is eventually produced, which could result in the need for another immediate local plan review to bring local policy into alignment with the government's plans for the Arc.
- 4.14 Government has published its Levelling Up White Paper and planning reform is now likely to be part of a Levelling Up and Regeneration Bill to be published sometime during 2022. It is not known what shape planning reform will take or the timetable for its introduction. Transitional arrangements may be put in place and the Council may or may not qualify to take advantage of them. There is a risk that as a result of planning reform measures, further work will need to be carried out on the plan or its evidence base before it can be submitted for examination or during the examination itself, thus missing the submission deadline and delaying adoption.
- 4.15 In 2020, central government and the East West Rail Company announced their decision that the route of the new railway line between Bedford and Cambridge would pass through Bedford Midland Station and out to the north along what is known as Route Corridor E. A consultation on options for the precise alignment of the track within the corridor commenced on 31 March 2021 and ran until 9 June 2021. Until a final decision on the alignment is published, there is a risk that it could conflict in some way with proposals in the local plan.
- 4.16 There remains a risk that any future restrictions associated with the Covid 19 pandemic will have an adverse impact on the ability of consultees, including statutory consultees, to engage fully in the consultation or examination process. Changes brought in through the Statement of Community Involvement and the Planning Inspectorate's arrangements for remote hearing sessions will help to mitigate this risk.

- 4.17 There is a risk that plan progress will be adversely affected by a lack of staff resources, including the ability to attract and retain appropriately experienced planning policy staff, and specialist staff in other teams in the Council whose input on local plan matters is essential.

Environmental Implications and contribution to achieving a net zero carbon Council by 2030

- 4.18 The Local Plan 2040 is supported by a sustainability appraisal in order to appraise its social, environmental and economic effects. Sustainability appraisal includes the legal requirement to undertake a strategic environmental assessment. It is an integrated part of the plan preparation process.
- 4.19 A Habitats Regulations Assessment has also been prepared to assess the impact of the plan on European protected sites (now known as the National Site Network). Having considered all policies and allocations in the Bedford Local Plan, the Assessment concludes that the Local Plan will not result in any adverse effects on any designated sites, either alone, or in combination with other plans and projects.
- 4.20 These supporting documents will be available during the consultation period (see Appendix C to this report).

Equalities Impact

- 4.21 The report has been compiled with consideration to the Bedford Borough Council's statutory Equality Duty to eliminate unlawful discrimination, advance equality of opportunity and foster good relations, as set out in Section 149(1) of the Equality Act 2010.
- 4.22 Recommendation (b) has been subject to a Level 1 equality analysis. In summary this states that a range of potential impacts both positive and negative have been identified. Negative effects on equality groups relate primarily to the environmental impacts of development, such as poor air quality, traffic and congestion and noise. These can be mitigated through the inclusion of appropriate policy criteria, where necessary, and proposals for mitigation are informed by the sustainability appraisal of the local plan.
- 4.23 Policies in the Local Plan 2040 may have a wide range of potential positive effects on all equality groups and significantly contribute to social equality in promoting inclusiveness and accessibility to provisions such as open spaces, employment and training/job opportunities, and in particular affordable housing. The groups that are likely to benefit particularly are those concentrated in or near locations for growth where most development is likely to take place. These are age groups, race and religious groups and those suffering deprivation.
- 4.24 Whilst the analysis has found that development resulting from the new local plan may potentially produce decreased environmental opportunity, particularly in growth locations, the range of positive effects and opportunities (social, economic and environmental) afforded to equality groups through growth orientated development are considered to outweigh appreciably the negative impacts.

- 4.25 The analysis demonstrated that the draft plan has taken all appropriate opportunities to advance equality and foster good relations between groups. Potential negative environmental effects on equality groups resulting from new development and growth should be appropriately mitigated. A copy of the equality analysis can be viewed at http://www.bedford.gov.uk/community_and_living/equality_and_diversity/equality_analysis/env_sustainable_communities.aspx

5. **DETAILS**

Introduction

- 5.1 The Local Plan 2030 was adopted in January 2020. The reason that a review is being carried out so soon is explained in para 4.7 above.
- 5.2 Because the majority of the Council's development management policies and site allocations policies are up to date and do not need to be changed, it was always the intention that the plan would focus only on new policies needed to deliver growth beyond 2030, and parts of the development plan where new national policy means local policies need to be amended, deleted or introduced.
- 5.3 The timetable for the production of the plan is set out in the recently updated Local Development Scheme 2022. The stages involved in plan making are outlined in 4.2 above and in order to be ready for submission in January 2023, it is necessary to carry out the Publication Stage (Regulation 19) during early summer 2022.

Earlier stages

- 5.4 As a reminder, a first statutory 'Issues and options' scoping consultation was carried out during July, August and early September 2020 under Regulation 18. It invited views on different kinds of locations for growth, being clear that it was likely that a combination of those locations would be needed to accommodate the scale of development to be planned for. Comments were also invited on other matters, including which existing policies needed to be updated, new ones introduced, and the timescale that the plan should cover. The responses to this first consultation were important in helping to guide the scope of the Local Plan 2040. All of the responses are published in full on the Council's web site.
- 5.5 A 'call for sites' was carried out as part of this first consultation so that those with land that is available for development could make the Council aware and so that the Council had up to date information about sites that had been submitted in respect of earlier plans. Around 430 sites were put forward for consideration. Details of the sites were also published following the close of the consultation.
- 5.6 There is no limit on the number of consultations held at the first Regulation 18 stage of plan making, and the timetable allowed for a second 'Draft Plan: Strategy Options and draft policies' consultation which took place during July, August and September 2021. On this occasion the

conversation moved on to look in more detail at the plan's strategy, inviting comments on seven strategy options and identifying Option 2 as the Borough Council's emerging preference. Option 2 focused growth on the urban area, the A421 corridor and existing and planned railway stations. Four variations of option 2 were presented, all but one including the option of having one or two new settlements.

- 5.7 In addition, people were invited to comment on the potential development sites that had been submitted in 2020. At this stage the assessment of sites was ongoing and it was too early for any to have been discounted. Nevertheless, inviting comments at this stage enabled consultation responses to be considered before any selections were made.
- 5.8 Despite the fact that the Council had not invited the submission of further potential development sites, 14 new areas of land were sent to the Council during the consultation period. This is common when preparing local plans and experience tells us that local plan Inspectors will expect the Council to have taken these new sites into account. As a result, they were registered and have been published alongside the 2020 submissions. Local Councils were made aware of the new sites that had been submitted.
- 5.9 In response, some parish councils and local residents asked if they could submit comments on the new sites outside of the formal consultation period. Where such comments were received, they have been reviewed and retained but will not be carried forward to the next consultation stage. Those making submissions outside of the consultation period have been advised that they should resubmit any relevant comments during the next formal consultation.

Consultation 2021 responses

- 5.10 Just over 500 people or organisations responded to the 2021 consultation paper. In total 4,400 separate comments were made, and one petition relating to development at Gibraltar Corner (178 names). Almost all of those comments arrived electronically, either by being entered by the respondent into the on-line consultation system (just under 29%) or by email (just under 71%). About three quarters of the comments are logged as objections and one quarter are logged as supports.
- 5.11 In addition, around 280 individuals or organisations commented on potential development sites and in total just under 1,100 separate comments were made. Again, almost all of the comments were made electronically with 54% entered directly into the on-line consultation system and just under 46% sent in by email. 69% of the comments on potential development sites are logged as objections with 31% logged as supports.
- 5.12 All 2021 consultation responses have been published in full, but a summary of main comments made in relation to each part of the consultation paper can be found at Appendix A to this report along with a response. Consultation responses can be read in full by visiting <https://bedford.oc2.uk/> Under the section 'Historic documents'. Comments received on the Draft Plan (2021) are published alongside the section of the consultation document to which they relate. Similarly, by viewing the document Site Assessment Pro Formas (2021) comments on potential development sites can be viewed.

5.13 Consultation comments are important and, where appropriate, the Local Plan 2040 has been drafted to address the matters raised during the two Regulation 18 consultations.

General comments

5.14 Generally speaking, there was support for the Council's decision to carry on with the local plan in order to retain control over where growth will occur. However, some of those responding took the opposite view, saying that the plan should be delayed until such time as the Arc Spatial Framework is in place and the East West Rail route resolved.

5.15 There was concern in general and across all sections of the consultation about the scale of growth, in particular housing growth, and its impact on existing infrastructure, including green infrastructure. The point was made that housing growth is too high and is based on out of date data. Others took the view that complying with the standard method isn't enough; the Council should be planning for higher growth to meet Arc ambitions.

5.16 Another recurring theme was the need for the relationship with the recently adopted Local Plan 2030 and related neighbourhood plans (both those that are still emerging and those that have been 'made') to be clearly explained in the plan. Also for climate change and in particular sustainable travel to underpin the plan's strategy.

Strategy – where should growth take place

5.17 This section of the consultation attracted the most comments; 724 in total. Most came from residents (517) and a significant number of those (226) came from residents objecting to options that included the proposed development at Denybrook new settlement, basing their response on a standard text that had circulated in the local community.

5.18 The following table shows the preferences given in the remaining residents' responses, in those cases where a clear preference was given. Most relate to the Council's published preferred options 2a to 2d.

Option preferences	
Option 1 – urban area only	3
Option 2a – urban area, plus A421 transport corridor with rail based growth – south. No new settlement at Wyboston or Little Barford	63
Option 2b – urban area, plus A421 transport corridor with rail based growth – south, plus one new settlement (Wyboston or Little Barford)	55
Option 2c – urban area, plus A421 transport corridor with rail based	81

growth, plus two new settlements (Wyboston and Little Barford)	
Option 2d – urban area, plus A421 transport corridor with rail based growth – south and east, plus one new settlement (Wyboston or Little Barford)	16
Option 3a – urban area, plus four new settlements (Colworth, Twinwoods, Wyboston, Little Barford)	0
Option 3b – urban area, plus two new settlements (two of the four in 3a), plus key service centres	0
Option 3c – urban area, plus two new settlements (two of the four in 3a) plus key service centres, plus rural service centres	0
Option 4 – A421 transport corridor with rail based growth, plus key service centres, plus rural service centres	0
Option 5 – A421 transport corridor with rail based growth, plus two new settlements (two of the four in 3a)	1
Option 6 – A421 transport corridor with rail based growth, plus two new settlements (two of the four in 3a), plus key service centres, plus rural service centres	1
Option 7 – Development in two new settlements (two of the four in 3a), plus key service centres, plus rural service centres	0

- 5.19 In total, 27 of the Borough's 47 town and parish councils responded. Of those who expressed a preference, most supported one or more of the Option 2 strategy variants. Preferences depended to some extent on the location of the council's area, but greatest support was for Option 2a. This was the option that included no new settlement at Wyboston or Little Barford but concentrated growth in the urban area and parishes to the south; Kempston Hardwick, Stewartby, Wixams; Cotton End, Elstow, Kempston Rural, Shortstown, Wilstead and Wootton.
- 5.20 The least popular was Option 2d which included one new settlement at either Wyboston or Little Barford and spread the remaining development over a larger number of parishes along the A421 corridor; those listed in option 2a plus Cardington, Cople, Great Barford, Little Barford, Roxton, Willington and Wyboston.
- 5.21 Developers, their agents or consultants submitted 123 responses to this section. When it comes to strategy preferences it is difficult to draw general conclusions, as the many and varied responses represent a wide range of interests. Common to many responses was a desire to promote a specific site or sites, leading them to support those strategies that might include their site and object to strategies that did not. A number express concern at over-reliance on large sites or difficult urban sites as they may not deliver sufficient development.

- 5.22 Other local authorities were generally supportive of the direction of the plan with a main concern being the impact of increases in road traffic on existing networks and potential impact of development on nearby settlements (including St Neots). Other statutory consultees responded with comments on a range of specific and often technical issues.
- 5.23 In relation to employment growth, the comment was made by many respondents that new sites should be located in transport corridors with good access to public transport, walking and cycling options. Some were of the view that the Council should provide for a range of employment types, including warehousing, whilst others thought that there is already too much of this kind of 'big-shed' development and urged the Council to provide sites suitable for more well-paid, skilled jobs.
- 5.24 Comments were also made in respect of the amount of employment land needed, suggesting that the Council should test a range of different job forecasts, with some thinking that the consultation information underestimated need. Others thought that the change in working patterns might mean that less employment land is needed as more people are likely to work from home in future, concluding that the Council needs to have a flexible approach.
- 5.25 There was also mention of the need to address employment planning in rural parts of the borough, in existing villages and the expansion of existing employment sites in rural areas to provide new jobs.

Town centre and retail policies

- 5.26 The consultation document contained a section on town centre and retail policies. There was support for the approach in general with many commenting the town centre should be a location for housing growth in order to support town centre businesses. Another comment was that long term predictions of retail need should be treated with caution owing to the speed of change in the way that our town centres are used. It may well be the case that no further retail sites are needed.
- 5.27 There was some concern about the impact of out of centre retail parks on town centres and that a 'town centre first' sequential policy should be supported.
- 5.28 Others commented on the need to regenerate the public realm in town centres (including the Saxon centre in Kempston) to attract more visitors and businesses, also the need to support high quality frontages for buildings to improve the attractiveness of town centre areas.
- 5.29 Appendix A gives more detail on the wide range of comments on this section of the consultation document.

Development management policies

- 5.30 Three draft development management policies were published for comment.
- Self-build and custom housebuilding

Roughly half of the responses relating to this policy took the form of a template submitted by consultants on behalf of various clients. Comments included that the policy shouldn't focus on large schemes because most self-builders want a plot on a smaller rural site, that a narrowly focussed plan strategy could lead to an over-concentration of self-build opportunities in one particular geography and that there are complications associated with providing self and custom build opportunities on larger sites that the Council needs to consider.

It was suggested that specific sites for self and custom build homes should be allocated and that the Council should consider self and custom build to be an exception, allowing plots to be released in locations where residential development wouldn't otherwise be allowed.

There were detailed comments about the policy wording and requirements, some to do with how affordable housing and flats are taken into account (that the policy should not apply to those) and others to do with the marketing requirements which some felt were too onerous and others felt were not extensive enough.

- Quality of development and space standards

There was general support for the preparation of a design guide with a wide range of suggestions about what it might include. Subjects covered included parking, the need for sustainable forms of transport and a need to look at the context of buildings including green infrastructure and the historic environment.

There was some support for adopting national space standards but also some objection because it was felt that there needed to be specific local evidence to justify adopting national minimum standards, that this approach may have an impact on viability and the Council would need to be flexible when applying the policy.

- Natural environment section – Environmental Net Gain

Again there was general support for the ambition in this policy, but also some concern that policy for environmental net gain goes beyond what is in the Environment Act. There was a suggestion that the need for 10% minimum biodiversity net gain needs to be explicit in the policy, and that there should be information in the plan about how biodiversity and environmental net gain will be measured using the DEFRA metric.

There was concern about how the requirements of the policy could be met if it wasn't possible to do that on-site. Also that the sheer scale of growth in the Oxford to Cambridge Arc would mean that the impact of growth on the environment would be significant and that environmental net gain could not be achieved.

Evidence base documents

5.31 A number of evidence base documents were published for comment and many often detailed comments were made, sometimes on very technical matters. The various studies have been reviewed in light of those comments and where necessary, changes have been made to improve the quality of the evidence supporting the plan.

Other matters

5.32 Text was included in the consultation document to explain the Council's current position on a number of issues. Comments on those include the following.

- Climate change

Of those who commented on this part of the document, most supported the principles of mitigating the effects of and adapting to the effects of climate change, and seeking to achieve net zero emissions. However, some of those also had comments on specific aspects of the plan and their relationship with climate change issues. For example, the scale of growth was for some not compatible with achieving climate goals. East West Rail was also a concern for some respondents, with the comment that the damage caused by large scale infrastructure projects can outweigh the benefits.

Others commented on ways that development could contribute to the Council's goals, for example by promoting highly sustainable homes, denser patterns of development in appropriate locations and planning to achieve 20 minute neighbourhoods so that residents have less need to use the car and can enjoy a more sustainable way of living.

- Gypsies, Travellers and Travelling Showpeople

There was support for the Council's intention to plan for both travelling and non-travelling travellers, and to make sure that the timing of provision, especially to meet needs early on in the plan period, is appropriate and that reliance should not only be on planning applications; allocations should also be included in the plan.

- Open Space standards

There was general support for the principle of providing open space as part of new developments, and the principle of keeping the pitch standard up to date. Those responding commented on the need to provide space early on in a new development and to consider travel distances to ensure they are not too long. Another comment was that in some locations existing pitches are not fully used. Management and maintenance issues were raised, with a preference for parish councils to take sites on where possible. It was also identified that sports pitches provide opportunities to enhance biodiversity.

Comments on the consultation itself

5.33 Some responses mentioned dissatisfaction with the consultation process, with those responding saying that they were unaware that a first consultation had taken place in 2020 or that the plan was being prepared. There was criticism that the amount of information was too

detailed and too much to read and take in, whilst others felt that there was not sufficient information in the leaflet that was delivered to every household, particularly that it illustrated only the four preferred options, leaving a description of all options to a separate paper.

The Local Plan 2040: Plan for Submission

5.34 The Local Plan 2040: Plan for Submission can be found at Appendix B to this report. It is made up of six sections.

Section 1: Introduction

- 5.35 The introduction to the plan explains the reasons for the early plan review and the national policy context, including the government's ambitions for the Oxford to Cambridge Arc and how the plan has needed to progress despite delays to the Arc Spatial Framework timetable and the East West Rail project. Whilst both are important to the local plan, there is no indication from government that either project will be abandoned, and no suggestion that local plan work across the Arc should stop. In fact, just the opposite; local authorities are being urged to make progress with new plans, and in Bedford's circumstances there would be significant consequences if the Council decided to pause.
- 5.36 As a result, the introduction identifies the ways that the local plan is aligned with published Arc priorities. It provides a range of new allocations to support the expansion of existing businesses and attract inward investment. In relation to housing, by meeting housing needs as defined by the government's standard methodology in full, the plan reflects an increase in the rate of housing growth of 40%. The ambitions of the Arc Environment Working Group, found in the Arc Economic Prospectus, are reflected in a new environmental net gain policy which will also reflect new legislation requiring most new development to deliver at least a 10% net gain in biodiversity.
- 5.37 This section of the plan also explains the progress that has been made by our neighbourhood plan groups. A deadline of January 2021 was set for the submission of all those neighbourhood plans that would include new development sites to deliver Local Plan 2030 commitments. Despite the challenges of the Covid pandemic, the vast majority of those were submitted by the deadline and most are now 'made'. In combination, the neighbourhood plans that have been prepared make allocations for around 2,400 dwellings, which is slightly more than the Local Plan 2030 anticipated (2,260). The Local Plan 2040 builds on the 2030 plan's strategy and rolls the planning of the Borough on for another ten years. In doing so, the contribution of these neighbourhood plans is acknowledged, as their allocations will be important in helping to meet the Council's growth targets in the first ten years.
- 5.38 Whilst no additional Key Service Centre or Rural Service Centre growth targets are included in the 2040 plan, communities may decide to review or make new neighbourhood plans and allocate development sites to meet local needs. Should this happen, the additional growth will add choice and flexibility on top of allocations made in the Local Plan 2040 and earlier local plans.

Section 2: Vision and objectives

- 5.39 The vision explains the focus and direction of the plan. Woven throughout are references to climate change and ways that development can be brought forward with sustainability and better environmental quality at its heart. It recognises the potential benefits of East West Rail, including a new town centre rail hub in Bedford itself, with positive benefits for the local economy. The town centre receives particular attention with the vision anticipating a wider range of uses and a centre where visitors can enjoy a much improved local environment. More people living in the town centre will also support businesses and enhance the vitality and viability of the area.
- 5.40 Prioritising walkable neighbourhoods that allow residents to reach daily needs on foot, and planning these within a strong green infrastructure network will create places where people can have a healthier and more sustainable lifestyle. Part of this will be about protecting and embracing existing parks and green networks, and delivering ambitious green infrastructure projects in the Forest of Marston Vale and Bedford to Milton Keynes Waterway Park.
- 5.41 The four themes of ‘more prosperous’, ‘better places’, ‘more accessible’ and ‘greener’ create a framework within which sit the plan’s objectives.
- 5.42 As the Local Plan 2040 is a partial replacement of existing policies, the last part of the introductory section explains the remaining scope of the plan which is as follows:
- Climate Change
 - Development Strategy to 2040 and site allocations in order to meet national policy requirements
 - Town centre and retail policies in order to support a more flexible future for our centres
 - New and updated development management policies (those used to help make decisions on planning applications) to do with:
 - A refreshed housing chapter including:
 - Affordable housing (replaces LP2030 Policy 58S¹)
 - Review mechanisms (new policy)
 - Housing mix (replaces LP2030 Policy 59S)
 - First homes exception policy (new policy)
 - Self-build and custom housebuilding (new policy)
 - Residential space standards (new policy)
 - Environmental net gain (replaces LP2030 Policy 43)
 - New employment development in the countryside (replaces LP2030 Policy 75)
 - Horse and Equestrian Activities (new policy)
 - Non designated heritage assets (new policy)

¹ Policies with the suffix ‘S’ are strategic policies

- Outdoor sports space in association with new development (partially replaces ADLP policy AD28)
- Tall buildings (new policy)

Section 3: Climate change

- 5.43 This section of the plan draws together information on this important cross cutting subject. It describes the Borough Council’s approach, referencing the declaration of a climate emergency in 2019, the pledge to make its own operations carbon neutral by 2030, preparation of a Carbon Reduction Strategy to explain how that will be achieved, including offering grants to community groups through the Climate Change Fund and setting up a Climate Change Committee to monitor best practice and track progress towards the achieving the Council’s goals.
- 5.44 It makes the join with the new Corporate Plan ‘Together Bedford borough 2022 – 2026’ which also takes climate change as a cross-cutting theme.
- 5.45 A new Policy DS1(S) explains how development will support a move to carbon neutrality. As an overarching policy it cross-references to other already adopted policies and new planning policies in the Local Plan 2040.

Section 4: Spatial strategy and site allocations

- 5.46 The spatial strategy explains where homes and jobs will be delivered through new allocations. It builds on the strategy in the Local Plan 2030, respecting the allocations that have already been made in local plans and neighbourhood plans. This is reflected on the key diagram which can be found at the end of this section.
- 5.47 Having considered the responses to the two earlier consultations, the spatial strategy focuses growth as follows:
 - first in the urban area with all suitable sites **within the urban area boundary** being allocated
 - at two sites **just outside the urban area that will help to deliver strategic green infrastructure projects** alongside development (Bedford River Valley Park with a water sports lake and a section of the Bedford to Milton Keynes Waterway Park)
 - at new growth locations focussed on the **A421 transport corridor and with the potential for rail-based growth**, particularly in the area **south of Bedford** and at **Little Barford**.
- 5.48 This strategy is closest to option 2b in the 2021 consultation, but contains two new settlements as promoted in option 2c, albeit one of them is in the area south of Bedford. By concentrating growth in accessible locations in and close to the urban area and close to rail stations, and by incorporating other sustainable travel measures and walkable neighbourhoods, the spatial strategy aims to minimise the need to travel by car and therefore minimise associated carbon dioxide emissions and congestion.
- 5.49 The area to the south of Bedford has its own overarching vision and policy (HOU12). The area covered is shown in Figure 5 (paragraph 4.78 of the plan). It presents an opportunity to plan strategic scale growth in an holistic way, linking existing and new development by sustainable travel routes to two new rail stations (at Wixams and north of Stewartby). Whilst sites closest to rail stations will offer the best locations for

higher density development, the provision of new publicly accessible and multi-functional green space will be an integral part of the planning of this area. As it lies within the Forest of Marston Vale, it is proposed that a new forest park will connect settlements and will provide new areas for forest planting and environmental net gain, which will benefit communities in nearby Bedford and Kempston, as well as communities within the south of Bedford area boundary.

- 5.50 The planning of a new settlement at Little Barford similarly presents an opportunity to maximise the benefits associated with such a well-connected location. A new rail station at the junction of the East West Rail and East Coast Main Line offers excellent sustainability credentials allowing the settlement to be planned in a way that makes walking and cycling to the station the mode of choice.
- 5.51 New employment sites are included in the plan to provide new jobs alongside new housing. Provision is made for a range of different types of employment to recognise Bedford's location at the centre of the Ox Cam Arc as well as its advantageous location on the A421, with good connections to the A1 and M1. Recent years have seen significant growth in the development of large sheds in the borough and whilst the need for these is acknowledged, moving forward the plan also provides employment space specifically for other types of employment that will provide a broader range of higher-skilled local job opportunities.
- 5.52 The following table lists the sites allocated in plan. Their location is shown in the 'Changes to the Policies Map' document found at Appendix C to this report (number 50). Where there is one, the relevant 'call for sites' reference is given in brackets and further site details can be found by clicking on it. In some cases, the local plan policy does not reflect in full the details put forward in the call for sites submission. Capacities are estimates, as it is only when detailed planning of a site is carried out that a final capacity can be known.

Policy reference (call for sites reference)	Title	Description	Estimated capacity (dwellings where appropriate)
Urban area			
EMP1 *	Land at Bedford Station	Transport interchange, residential, office, academic and retail	n/a
HOU1 (1246)	Land at Greyfriars North, Bedford	Residential and town centre uses	100 (net)
HOU2 *	Mayes Yard, High St and Silver St, Bedford	Mixed use, residential , hotel, retail, leisure	115
HOU3 (505 436)	Land at Amphill Road, Bedford	Residential, business and retail	530
HOU4 (1493)	Former Peacocks Auction House, Bedford	Residential	40
HOU5 (638)	Abbey Field, West of Elstow	Residential and public open space	200
HOU6 (768)	The Cloisters, Church Lane, Bedford	Residential and relocation of church hall	18
HOU7 (994)	Williamson Rd, Kempston	Residential	20
HOU8 (941)	Land west of Police HQ, Woburn Rd, Kempston	Residential	100
HOU9 (1336)	Land at Chantry Avenue, Kempston	Residential	40
HOU10 (7412)	Land at Bedford Heights, Bedford	Residential	15
EMP2 (481)	Former Playing Field, ARA Manton Lane, Bedford	Industrial, warehousing and distribution	n/a

EMP3 (524)	Land SW of Interchange Retail Park, Kempston	Industrial, warehousing and distribution	n/a
EMP4 (713)	Land south of Goldington Road, Bedford	Office, Industrial, warehousing and distribution	n/a
		TOTAL URBAN DWELLINGS	1,178
Adjacent to the urban area			
HOU11 (3245)	Land at Bedford River Valley Park	Residential, education, open space and recreation including watersports lake	1,000
HOU13 (636 1333)	Land at Gibraltar Corner, Kempston Rural	Residential and open space	500
		TOTAL ADJACENT URBAN AREA	1,500
South of Bedford			
HOU14 (1050 809 745 898 900 905)	Kempston Hardwick new settlement	New settlement – range of uses	3,800
HOU15 (1004)	Land South of Wixams	Residential and open space	300
HOU16 (3233)	Land at East Wixams	Residential, community, employment and open space	1,800
HOU17 (1513)	Land at College Farm, Shortstown	Residential and open space	1,000
HOU18 *	Land at former DVSA site, Shortstown	Residential	150
EMP5 (634)	Land at Pear Tree Farm, Elstow	Business park	n/a
		TOTAL SOUTH OF BEDFORD DWELLINGS	7,050
Little Barford			
HOU19 (907)	Little Barford New Settlement	New settlement – range of uses	3,800
Employment sites in other locations			
EMP6 (764 761)	Land at Water End and St Neots Road	Business park	n/a
EMP7 (1005)	Land at College Farm, Black Cat roundabout	Roadside services, industrial, warehousing and distribution	n/a
EMP8 (1355)	Land at Roxton, SW of Back Cat roundabout	Warehousing and distribution uses	n/a
* Not submitted through the 'call for sites' process		TOTAL DWELLINGS	13,528

- 5.53 In terms of the amount of development being planned for, the basis for housing growth is the government's standard method for calculating housing need. Over the 20-year plan period, 27,100 new dwellings must be planned for (1,355 per annum). This number has changed very recently and more detail about the impact of that change is given in Section 5.65 – 5.67 of the report. Taking into account existing commitments (including an allowance for 'windfall') the number of dwellings to be delivered by allocations in this plan is around 12,275.
- 5.54 In addition to this, an appropriate buffer should be included, and across the plan period the Council must be able to show a five year supply of available housing land. When the plan is formally assessed, the Council must be able to show that the choice of allocated sites will deliver these requirements. Based on the estimated capacities in the table above, the allocations would provide a buffer of just over 4.5% of the plan's housing need number.
- 5.55 A further round of annual monitoring will take place during the first quarter 2022 / 23 which is likely to result in a change to this calculation because development will have been completed during 2021 / 22 and new permissions will have been granted. As a result, an updated

statement (trajectory) will be prepared in due course to accompany the formal examination of the plan. Should it be requested, a further update will be provided during 2023 / 24 to inform the examination.

- 5.56 Because of the significant increase in the annual housing requirement (an increase from 970 in the Local Plan 2030 to 1,355 dwelling completions a year is an uplift of 40%) and the need to link growth to the completion of new infrastructure, housing delivery will be measured against a stepped trajectory, with current rates maintained at 970 dwellings per year to 2024 / 2025, rising to 1,050 for the following five years, and 1,700 for the remaining ten years of the plan period.
- 5.57 The biggest step at 2030 reflects the fact that by this date the A428 Caxton Gibbet scheme will be finalised and East West Rail is planned to be in operation, including the new stations at Stewartby Hardwick and Little Barford / Tempsford.
- 5.58 Alongside housing, employment allocations will accommodate around 26,700 new jobs.
- 5.59 This scale of new growth will need to be supported by appropriate infrastructure of all kinds. An Infrastructure Delivery Plan has been prepared to support the local plan's allocations.

Section 5: Town centre and retail policies

- 5.60 This part of the plan includes policies for the town centre, recognising the challenges brought by out of centre developments and changes in shopping patterns, particularly the rise in internet shopping. It explains how the government's Town Deal Fund and designation of a Heritage Action Zone on Bedford's High Street are helping to bring about improvements to buildings and the public realm in general to make the town centre a more attractive place for visitors.
- 5.61 Planning policies for town centres and retailing are updated to take account of recent changes in national policy and to provide a robust basis for the determination of planning applications. The town centre primary shopping area remains in place and it is expected that retail uses will locate here in preference to out of centre locations. However, policies support a wider range of uses in town centres including residential in locations where vitality and viability of the town centre would not be affected. Space above shops in particular can lend itself to conversion for residential use, with town centre residents helping to support existing and new town centre businesses.
- 5.62 Whilst trend-based assessments show that some new retail floor space may be needed in future, the significant change in shopping habits over recent years may mean that this will not be necessary. On-going monitoring of retail policies, shopping trends and diversification in the town centre will provide local evidence on which to base future decisions about the need for additional floor space.

Section 6: Development management policies

- 5.63 As mentioned above, twelve development management policies are included in the plan; they cover the following subjects:
- **Affordable housing** – to reflect the government's new first homes policy. Updates existing policy.

- **Affordable housing review mechanism** – to explain that a review will be required in instances where a viability appraisal initially results in agreement that a non-compliant level of affordable housing is justified. Improvements in viability may mean that additional affordable housing can be justified in later stages of the development. New policy.
- **Housing mix** – to update the current policy to ensure that an appropriate housing mix is achieved. Updates existing policy.
- **First homes exception policy** – to reflect the government’s new first homes policy requirement. New policy.
- **Self-build and custom housebuilding** – to increase the supply of self and custom build opportunities in line with government policy. New policy.
- **Residential space standards** – to require all dwellings to conform to nationally described space standards as a minimum. New policy.
- **Environmental net gain** – to include in policy a requirement for environmental net gain, incorporating a minimum 10% biodiversity net gain required by the Environment Act. Aligns local plan policy with Arc Environment Principles and updates existing policy.
- **New employment development in the countryside** – to explain how applications for this type of development will be considered. New policy.
- **Horse and equestrian related development / activities** – to explain how applications for this type of development will be considered. New policy.
- **Non designated heritage assets** – to explain how these will be identified. Requested by Historic England. New policy.
- **Outdoor Sports Space in association with development** – to update policy based on a recently completed Playing Pitch Strategy. Partially updates existing policy.
- **Tall buildings** – to explain policy requirements where proposals for tall buildings are being considered. Requested by Historic England. New Policy.

Supporting documents

- 5.64 The evidence base supporting the policies in the local plan can be found at Appendix C to this report. Currently available documents can be viewed by clicking on the hyperlinks in the table. Some are very technical reports and are necessarily so in order to withstand the scrutiny associated with the examination process. Others are Topic Papers which explain the reasoning behind some of the plan’s policies and approach. Past experience shows that these will be helpful during the examination process.
- 5.65 The standard method formula for calculating housing need relies on national data sets, one of which – national housing affordability - is updated each year in March / April. In 2020 when work on the local plan commenced, the local housing need based on the formula was 1,305 dwellings per annum. In 2021 when new information was published, affordability had improved in Bedford Borough and the number fell to 1,275 dwellings per annum. The latest update received at the end of March 2022 reflects a worsening of affordability, leading to a consequential increase in the annual dwelling requirement to 1,355 dwellings per annum.

- 5.66 Many of the supporting documents are based to some extent on the dwelling requirement derived from the standard formula. The scale of the increase in March 2022 has necessitated an update of those documents so that they reflect the new number and provide a robust evidence base for the plan. References in the Local Plan 2040 itself have also been updated.
- 5.67 A small number of supporting documents have yet to be completed. Rather than delay progress on the local plan, these will be the subject of a separate Executive Decision prior to the commencement of the consultation. The required updates are not considered to have a material bearing on either the strategy or the policies of the draft plan as now before the Executive. At the present time those documents are as follows:
- Bedford Employment Land Study (Part 1)
 - Development Strategy and Site Selection Topic Paper
 - Housing and Employment Land Availability Assessment and Site Assessments
 - Infrastructure Delivery Plan
 - Infrastructure Delivery Plan - The Need for Stepped Trajectory: Transport
 - Bedford Borough Transport Model: Assessment of LP2040 Preferred Strategy
 - Strategic Flood Risk Assessment Level 2 + Appendices

The purpose and scope of the forthcoming consultation exercise, and next steps in the preparation of the plan

- 5.68 Formal publication of the 'Plan for submission', also known as Regulation 19 consultation, invites local residents and others with an interest to support, object to or comment on the plan. At this stage, representations must be made on a standard form and must be received by the published deadline. Questions are asked about the plan's soundness and legal compliance. Those objecting on the basis that the plan isn't sound are asked to say how the plan should be changed to make it sound.
- 5.69 Regulations require that the consultation period must be at least six weeks and is scheduled to run from 15th June to 29th July 2022. The contacts on the local plan consultation list will be directly notified and information will be made available to enable local councils to publicise the consultation in their local area. The 'Plan for Submission' and the supporting documents will be made available on the Council's web site and in paper copy in the Borough's libraries and at the Customer Services Centre. Documents will also be placed in libraries close to but outside the Borough. Further details of the consultation arrangements will be published in due course.
- 5.70 Following the close of the consultation, Officers will prepare a summary of the main issues that have been raised. These will be reported to a meeting of the Executive on 4th January 2023 along with any proposed minor amendments to the plan. If major changes need to be made

(such as a substantial change to the level of growth or the addition of a development site) then the Regulation 19 consultation would need to be repeated so that the Examination Inspector is aware of any objections made by consultees.

- 5.71 If the Executive is satisfied that having considered the main issues raised during the consultation, the plan should be submitted for formal examination then it will be invited to recommend this course of action to a meeting of Full Council on 11th January 2023. If Full Council approval is given, the Local Plan 2040 and supporting documents will be submitted for formal examination shortly afterwards.
- 5.72 The timetable described above reflects the recently updated Local Development Scheme. A decision by Full Council on 11th January 2023 to submit the plan for formal examination will enable the plan and supporting documents to be delivered to the Planning Inspectorate in compliance with Local Plan 2030 Policy 1.
- 5.73 The examination of the plan commences on the day that the plan is received by the Planning Inspectorate.
- 5.74 The Council must appoint a Programme Officer to manage the examination process. Those people who have objected to the plan have a right to request an appearance at the hearing sessions though the Inspector will decide who will be invited to take part. In liaison with the Inspector the Programme Officer will prepare a schedule of public hearing sessions so that the main issues can be debated. Once the hearing sessions have finished, the Inspector will prepare a report and will ask for any main modifications to be advertised.
- 5.75 Following consideration of any consultation responses on the modifications the Inspector will prepare his / her final report to the Council. If found to be sound, the Council will be able to adopt the plan. The timetable will depend on the availability of an Inspector, the number and range of objections received and the number of hearing sessions required, but it is hoped that the plan can be adopted in late 2023 or shortly thereafter.

6. ALTERNATIVES CONSIDERED AND REJECTED

- 6.1 The preparation of the local plan could have been delayed until more is known about the future of the OxCam Arc / the Arc Spatial Framework, detailed route of East West Rail and local plan reform in general, however this was rejected because the consequences, should the plan not be sufficiently progressed and submitted in January 2023, would be significant for all parts of the Borough as explained in 4.8 above.

7. SUMMARY OF CONSULTATIONS AND OUTCOME

- 7.1 The following Council Units or Officers and/or other organisations have been consulted in preparing this report:
- Mayor Dave Hodgson: Portfolio Holder
 - Management Team

- Chief Officer for Finance
- Chief Officer Legal & Democratic Services
- Energy Team
- Manager for Strategy and Policy

No adverse comments have been received.

8. **WARD COUNCILLOR VIEWS**

This report does not relate to an individual ward.

Report Contact Officer:

Gill Cowie

Manager for Planning and Housing Strategy

Tel 01234 718567 gill.cowie@bedford.gov.uk

File Reference:

Local Plan 2040

Previous Relevant Minutes:

None

Background Papers:

None

Appendices:

Appendix A – Summary of consultation comments with Officer responses

Appendix B – Local Plan 2040 – Plan for Submission

Appendix C – Documents supporting the Local Plan 2040