



# Local Plan 2040

Have Your Say on the Future of Your Borough

## LOCAL PLAN 2040 – DRAFT PLAN STRATEGY OPTIONS AND DRAFT POLICIES CONSULTATION

**JUNE 2021**





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# 1.0 Introduction

## **Why we are preparing the Local Plan 2040**

- 1.1 Bedford Borough Council has an up to date local plan that makes provision for growth to 2030. Normally local plans are reviewed every five years but this update is required sooner in order to reflect emerging national policies for the Oxford to Cambridge Arc. Policy 1 of the Local Plan 2030 requires that the review is progressed swiftly, with the submission of the plan to government for examination by January 2023 so that examination in public can commence. If that deadline is missed, then for the purposes of determining planning applications our local plan policies will be deemed to be 'out of date' in the same way as they would if we were to be unable to show a five year supply of housing land, meaning that local control over where development will happen will be much reduced.
- 1.2 The timetable set for the Council's plan review was challenging before the Covid-19 pandemic began, but the change in working practices and limitations placed on the Council's staff, partner organisations and the Council's consultants over the past 15 months has meant that keeping on-track has been extremely difficult. Progress has been slowed as a result of the switch to remote working, restrictions on site visits (especially during the first half of 2020) and depleted staff resources across the Council and within other agencies.
- 1.3 Nevertheless, a first Issues and Options consultation took place as scheduled during summer 2020. The purpose of that first stage was to invite comment on the scope of the review, the time period that an updated plan should cover and the kinds of locations where future growth might take place. The responses to that consultation have informed this document and in particular have helped to shape the growth options that appear in later sections. A summary of consultation comments is available (see Table 1) and all responses are published in full on-line.
- 1.4 At the same time the Council issued a 'call for sites' to update information received during 2014 and 2015 about land that owners wish to make available for development. Around 430 sites were submitted to the Council and similarly these have been available to view on the Council's web site since autumn 2020.

### **National context and plan period**

- 1.5 National Policy requires that strategic policies in local plans should look ahead over a minimum of 15 years from adoption<sup>1</sup>. With adoption planned for late 2023, the shortest end-date for this plan would be 2038. A longer timescale would have the advantage of giving certainty for a longer period but, as is explained in the paragraphs below, many important strategic decisions that will affect the scale and form of growth in and close to Bedford Borough in the medium and longer term are likely to be made in the next few years. As a result, and having considered the 2020 consultation responses, the Council's view is that 2020 - 2040 is an appropriate time period for this plan. With a requirement now for five-yearly local plan reviews there will be sufficient opportunity to plan beyond 2040 once the regional planning context is clearer.
- 1.6 The government's ambition for the Oxford to Cambridge Arc is well-reported. In the document 'The Oxford-Cambridge Arc Government Ambition and Joint Declaration between Government and Local Partners' (2019) lead Ministers recognise the existing qualities of the location and its potential to attract additional higher quality jobs for existing and new communities. They promote taking a long term view to 2050 and beyond, and commit to embedding 'natural capital' thinking throughout the government's approach to growth, which includes an ambition for up to one million high-quality new homes by 2050.
- 1.7 The declaration itself is silent on housing numbers. It recognises that the Arc is first and foremost an area of significant economic strength and opportunity, and through the joint declaration the partners (including the then 43 local authorities across the Arc) set out to meet the Arc's full economic potential for the benefit of existing and future local communities and businesses, and in the national interest. There is acknowledgement that to achieve this will demand collective determination over the long-term, to deliver significantly more homes in the Arc, of the right quality and in the right places to meet its needs. Also that this might include the expansion of existing as well as the development of new settlements. It will require long-term commitments to provide the enabling infrastructure and to deliver that ahead of the arrival of new communities, and to meet economic and housing ambitions while overall improving rather than degrading the environment in the Arc, in line with commitments in the government's 25 Year Environment Plan<sup>2</sup>.

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<sup>1</sup> NPPF 2019 Para 22. Town Centre policies to look ahead at least 10 years Para 85.

<sup>2</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

1.8 In February 2021 the government published a policy paper entitled ‘Planning for sustainable growth in the Oxford-Cambridge Arc: an introduction to the spatial framework’. It explains why the government is committed to developing a spatial framework for the Arc; what it will mean for growth, spatial planning and infrastructure provision in the area; and how government will work with communities and local partners to develop it. The intention is to ‘...develop a long-term Spatial Framework for the Arc that will support better spatial planning, provide a blueprint for better-targeted public investment, give investors and businesses greater long-term certainty over growth plans, and allow communities to shape the long-term future of places across the region. The nature and content of the Spatial Framework will be subject to the outcome of both detailed consultation and sustainability appraisal’ (para 2.1). A first public consultation is planned for summer 2021 which is two years later than initially intended in the joint declaration.

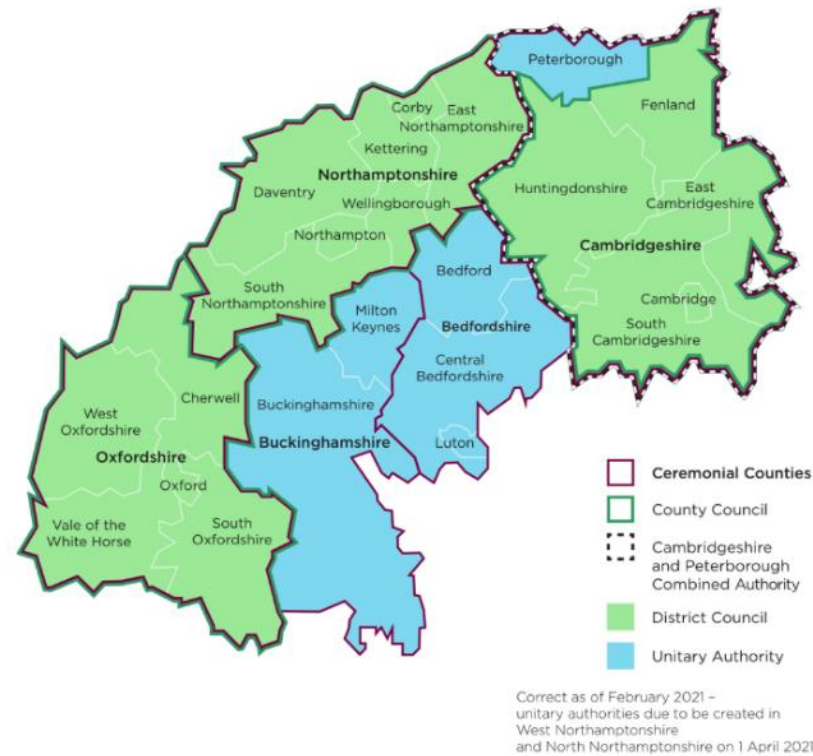


Diagram from ‘Planning for sustainable growth in the Oxford-Cambridge Arc: an introduction to the spatial framework’

- 1.9 In response to this delay, some local authorities in the Arc have adjusted their local plan production timetables so that planning activity follows the development of the Arc Spatial Framework in order to create a more joined up process. Government however has urged Councils in the Arc to carry on with plan-making and, in Bedford Borough's case, the consequences of not doing so could be significant for the reasons relating to policies becoming "out of date" described above; so preparation of this local plan must continue. The relationship between the local plan timetable and the published timetable for the preparation of the Arc Spatial Framework is shown below.
- 1.10 Whilst this local plan will progress alongside the development of the Spatial Framework it shares many of the overarching principles relating to economic growth and the natural environment. In these respects, the two will be aligned.
- 1.11 A review of business space will inform the allocation of new employment land in order to support the expansion of existing businesses and to attract inward investment. Where housing growth is concerned, as a result of existing commitments (including those made and to be made in neighbourhood plans) and new allocations to be made in this plan, Bedford Borough will make provision for significantly more homes as described in the Arc joint declaration. It will do this as a result of government's new standard method for calculating housing need which means an uplift of 33% when compared to the locally-calculated housing growth planned for in the Local Plan 2030.
- 1.12 The Council already has strong planning policies to protect and enhance the natural environment and as the new Environment Bill passes through its various parliamentary stages, the Council will consider how any of these policies need to change to bring them up to date. Strategic work to map the location of natural capital assets across the Arc is being translated to a more localised geography and we will look to see how our policies might embrace this new way of identifying environmental value and potential to achieve net gains alongside development.

### 1.13 Local Plan 2040 and Arc Spatial Framework Timetables

	Summer 2021	Autumn 2021 – Spring 2022	Summer 2022	Autumn 2022	January 2023	Throughout 2023	Winter 2023
Local Plan 2040	Consultation on draft development strategy options, draft policies and submitted sites	Consider responses and prepare plan for submission	Plan for submission consultation	Consider responses, prepare final plan and supporting documents	Submit plan to Planning Inspectorate	Examination in Public involving public hearing sessions. Consultation on main modifications	Publication of Inspector's report  Adoption of plan
Arc Spatial Framework	Consultation - developing a vision for the future of the Arc	Spring 2022 - Consultation on options for turning the vision into policy	Consider responses	Consultation on draft spatial framework		Implement final Arc Spatial Framework	

#### The scope of the plan

1.14 The Local Plan 2040 will be a partial update of existing policies. The Local Plan 2030 was adopted only last year and the vast majority of its policies are up to date and do not need to change. Remaining policies in the earlier Allocations and Designations Local Plan have been reviewed and, in the majority of cases, they remain fit for purpose and similarly do not need to change at this time. We asked for views about the scope of the plan during last year's consultation and the responses have helped us to focus on the following key policy areas:

- Development Strategy to 2040 and delivery of growth in order to meet national policy requirements
- Town centre and retail policies in order to support a more flexible future for our centres with a reduced focus on retailing
- Updated development management policies (those used to help make decisions on planning applications) to do with
  - Self-build and custom homebuilding



- Quality of development and residential space standards
- Environmental net gain

- 1.15 The reasons why new policies for other subjects are not proposed in this paper are explained in Section 8.0 below.
- 1.16 Appendix 1 shows which current planning policies would be replaced by proposed new ones.
- 1.17 Following on from last year's consultation we have considered comments about the different locations for growth and have developed combinations that could deliver new jobs and homes. A long list of options is given in the Development Strategy Topic Paper and a fuller list in the Sustainability Appraisal.
- 1.18 The Council's emerging preferred options are listed below in Section 3 but your comments are now invited on all options before a choice is made, and we ask you to tell us of others that you think should be considered.
- 1.19 Before deciding on a strategy and selecting land for development we are also inviting comments on the call for sites submissions. The assessment work so far completed by the Council is available to help you.
- 1.20 In addition, we are publishing for comment the latest evidence base documents. These may be updated in the light of comments we receive and, along with other evidence including a plan wide viability appraisal, will be available again for you to comment on at the next stage (during 2022).

1.21 The evidence base documents are as follows. If you have any comments to make on them at this stage please make them against the relevant paragraph numbers:

Table 1: Evidence base

	<b>Evidence Base document title</b>	<b>Author /source</b>
1.22	<a href="#">Bedford Borough Natural Capital Assessment Report</a>	Natural Capital Solutions
1.23	<a href="#">Bedford Borough Transport Model New Settlements and the A6</a>	AECOM
1.24	<a href="#">Bedford Borough Transport Model New Settlements and the Black Cat junction</a>	AECOM
1.25	<a href="#">Bedford Borough Transport Model New Settlement West of Wyboston</a>	AECOM
1.26	<a href="#">Bedford Borough Transport Model Local Plan Assessment Report</a>	AECOM
1.27	<a href="#">Bedford Borough Transport Model Local Plan Assessment Summary Report</a>	AECOM
1.28	<a href="#">Development Strategy Topic Paper</a>	BBC
1.29	<a href="#">Bedford Employment Land Study – 2021 (Part 1)</a>	BBC
1.30	<a href="#">Bedford Employment Land Study – 2021 (Part 2)</a>	BBC
1.31	<a href="#">Gypsy &amp; Traveller Accommodation Assessment</a>	ORS
1.32	<a href="#">Healthy Weight Environments Topic Paper</a>	BBC
1.33	<a href="#">Issues &amp; Options Consultation - summary and responses</a>	BBC
1.34	<a href="#">Landscape Character Assessment</a>	LUC
1.35	<a href="#">Local Housing Needs Assessment (LHNA)</a>	ORS
1.36	<a href="#">Bedford Town Centre Study</a>	NEXUS
1.37	<a href="#">Self-build Topic Paper</a>	ORS
1.38	<a href="#">Town Centres and Shopping Policies Topic Paper</a>	BBC
1.39	<a href="#">Site Selection Methodology – update June 2021</a>	BBC
1.40	<a href="#">Site Assessment Pro formas</a>	BBC
1.41	<a href="#">Small Sites Topic Paper</a>	BBC
1.42	<a href="#">Strategic Flood Risk Assessment (part 1)</a>	JBA
1.43	<a href="#">Strategic Flood Risk Assessment Appendices</a>	JBA
1.44	<a href="#">(Draft) Sustainability Appraisal Report</a>	BBC

- 1.45 The following documents are not yet available for comment, but will be finalised in order to support the plan for submission (2022).

<b>Evidence Base document title</b>	<b>Status</b>
Bedford Borough Playing Pitch Strategy	Commissioned
Crematoria and burial capacity	Commissioned
Hotel and visitor accommodation	Commissioned
Infrastructure Delivery Plan	BBC to prepare alongside site allocations
<a href="#">Housing and Employment Land Availability Assessment</a>	Draft methodology consulted on in July 2020. Update to be prepared
<a href="#">Settlement Hierarchy (September 2018)</a>	Review underway
(Final) Sustainability Appraisal Report	To be prepared
Plan wide viability assessment	To be commissioned

### **Neighbourhood planning**

- 1.46 Several of the borough's parish councils have already played a significant role in progressing commitments for housing growth in the 2020 - 2040 plan period. Given the opportunity back in 2017, ten local communities chose to prepare neighbourhood plans and make their own allocations for development in accordance with requirements in the Local Plan 2030. Despite the challenges presented by Covid-19, all but one have submitted their neighbourhood plans to the Council and six are now formally 'made'.
- 1.47 In total we estimate that the made and emerging neighbourhood plans will deliver around 2,260 dwellings. This contribution is acknowledged as the local plan strategy is rolled on to 2040.
- 1.48 Discussions with parish councils will continue during the preparation of the Local Plan 2040. If the favoured strategy involves additional development in and around villages where there is a genuine choice of site available, we will ask parish councils if they would like to select site(s) in a new or reviewed neighbourhood plan.

- 1.49 We would not expect neighbourhood plans to make large strategic allocations in locations where there is not a choice of site (for example a new settlement), including those that in some cases cross parish boundaries. These will be allocated in the Local Plan 2040.
- 1.50 As has already been the case, communities may decide to make neighbourhood plans and allocate development sites even though the local plan strategy doesn't require growth to be located there. Should this continue to happen, it will add choice and flexibility on top of allocations made in the Local Plan 2040.
- 1.51 We will continue to encourage groups to prepare neighbourhood plans and to support and work with local councils in a joined-up way to make sure that local and neighbourhood plans work together to support planning at the local level.

### **Summary**

- 1.52 Whilst there remain many uncertainties about planning for our borough area as a result of the emerging Oxford to Cambridge Arc Spatial Framework, the selection of a route for East West Rail following their recent consultation and indeed the timing of the introduction of a new national planning system following consultation by government on the 'Planning for the Future' White Paper<sup>3</sup>, the progression of this local plan will enable the Council and local communities to maintain control over the selection of locations for growth.

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<sup>3</sup> <https://www.gov.uk/government/consultations/planning-for-the-future>

## 2.0 Vision and objectives

- 2.1 The purpose of the vision is to demonstrate the focus and direction of the local plan. Your comments in the 2020 consultation have helped to shape this updated draft.

By the end of the plan period:

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

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

The development of East-West Rail through Bedford will be complete. Bedford will benefit from a new town centre railway hub with direct links to Oxford and Cambridge, increasing connectivity, investment and growth. As a requirement of the planning process, local development will be well served by the provision of up-front transport links and speedy internet access. Bedford Borough will continue to attract new business through the completion of significant infrastructure projects in and close to the borough and through the development of high quality commercial and office spaces. Greater connectivity will have a positive impact on the local economy attracting high tech employment sectors, creative industries and supporting existing retail centres.

In Bedford town centre a wide range of uses will provide greater variety and a broader visitor experience that will make the town centre more diverse and sustainable. Improvements to the High Street will make it a more enjoyable place, where local independent retailers thrive and people choose to linger. The development of previously planned vibrant new town neighbourhoods will be complete, widening housing choices in and close to the town centre, and transforming brownfield sites on the western side of the town and south of the river. Additional town centre living will encourage sustainable

methods of travel, enhance the vitality and viability of the town centre and support for local businesses. The town centre will be used increasingly as a community space, accessible to residents in the town, the borough and beyond.

Good design will help to improve quality of life and to create safer, vibrant and more sustainable places, both in the urban area of Bedford and Kempston and in the surrounding village communities. More walkable neighbourhoods that can include schools, health facilities, community halls, green spaces and other services will be in place. The borough's built heritage and wider historic environment will continue to be respected, protected and valued.

Development will be sensitively planned to complement the borough's natural environment. The borough's countryside, its intrinsic character and beauty including areas of tranquil retreat will be recognised. Rural communities will embrace appropriate development, in many instances through the preparation of their own neighbourhood plans. This development will reflect each area's unique local character whilst providing and supporting much needed housing and employment, rural facilities and services, including high speed broadband and public transport. Locally important green spaces and valued local landscapes will be protected and enjoyed by all.

The Embankment and formal Victorian parks in Bedford, along with the River Great Ouse valley and its riverside villages, will continue to form the backbone of the borough's rich green and blue infrastructure. There will be new multi-functional green spaces to complement and expand the existing network of paths and green corridors. Country parks north of Brickhill, west of Bedford and in the new town centre neighbourhoods will have matured and along with the Bedford to Milton Keynes Waterway will encourage healthy lifestyles, tourism and a diverse ecology.

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

2.2 The following themes reflect the vision and again take account of comments made during the 2020 consultation:

**Theme 1: Greener** – Working towards making Bedford a net zero carbon emissions borough whilst improving, enhancing and creating green infrastructure and spaces

Objectives:

Work towards making Bedford Borough a **carbon neutral borough**

Deliver high quality growth that **integrates closely with the surrounding landscape**, facilitating the development of more sustainable and inclusive places for local communities, which are equipped to respond to the impacts of climate and economic change and offer the opportunity to live healthier lifestyles.

**Develop a strong and multi-functional urban and rural green infrastructure network** through protecting, enhancing, extending and linking landscapes, woodland, biodiversity sites, heritage sites, green spaces and paths.

Improve access to green and blue infrastructure for the enjoyment and health of all.

**Protect and enhance our natural resources** including air, soil, minerals and water to minimise the impacts of flooding, climate change and pollution.

Move towards a **greener town centre** with enhanced connections to the river.

**Theme 2: More accessible** – Encouraging sustainable travel as well as taking the opportunities offered by strategic infrastructure for greater regional and national connectivity

Objectives:

**Reduce congestion in the borough**, particularly into and around the town centre, including making journeys by public transport, walking and cycling more attractive to encourage an increase in more sustainable and healthy modes of transport.

**Improve East-West connectivity and enhance multi-modal travel through the construction of the East West Rail line** routed through Bedford Midland station.

**Improve “first mile / last mile” local connections to strategic infrastructure**, allowing for easier access and greater integration

**Theme 3: More prosperous** – Supporting new business, educational and employment opportunities

Objectives:

**Support a stronger local economy** delivering economic growth, broadening employment opportunities and attracting and enabling high value businesses to prosper for the benefit of the borough's existing and future residents.

Create a distinctive, **attractive and multi-functional town centre** for the future, with a focus on leisure, culture and visitor economy activities, and high quality urban living

**Deliver the necessary social infrastructure to support growth** in both the urban and rural areas of the borough.

**Improve the borough's transport infrastructure** in order to support growth in the local economy and to make the borough more attractive as a place to live and do business.

**Theme 4: Better places** – Developing high quality, well-designed and beautiful places for all to use and enjoy

Objectives:

**Support and create a high quality, inclusive and safe built environment which values local landscapes and settlement character**, and which conserves and enhances the historic environment to be enjoyed by all.

Where it is viable and sustainable to do so, **encourage the re-use of land that has been previously developed.**

**Provide appropriate amounts and types of housing** to meet the needs of the borough's urban and rural communities over the lifetime of the Plan **making the housing stock more adaptable and resilient**

Achieve a borough where everybody has appropriate **access to high quality health and social care, as well as everyday essential services and community facilities** where social and cultural wellbeing are supported, enabling all residents to lead healthy and independent lives.

2.3 The interaction between themes and objectives is illustrated below.





## 3.0 Growth and spatial strategy options

### Level of housing growth required

- 3.1 Government guidance sets out a standard method for calculating future housing requirements, which the Council must follow. As a result of the government's recent revisions to the standard method, the figure for Bedford borough currently is 1,275 dwellings per year, giving a total of 25,500 dwellings for the 20 year period from 2020 to 2040. This is the current starting point for the local plan housing requirement.
- 3.2 Existing commitments (planning permissions, allocations from current local plans and an allowance for windfall, which together total 13,000 dwellings) mean that based on the standard method figure of 1,275 dwellings p.a. the new local plan will need to allocate land to provide a minimum of 12,500 new dwellings. Further detail is set out in the evidence base document Local Housing Needs Assessment (LHNA), however it should be noted that the standard method number for the borough has been altered by recent affordability figures and the LHNA was produced in relation to the previous requirement of 1,305 dwellings p.a.
- 3.3 The annual requirement in the adopted Local Plan 2030 is 970 dwellings per year. The 1,275 figure for this new plan represents a substantial increase to the adopted plan and will bring with it considerable challenges. The standard method is calculated using inputs taken from household and affordability data which are updated regularly. This means that during the plan preparation period, as mentioned above, the Local Housing Need may change. We will therefore keep the Local Housing Need figure under review and will change the figure as necessary at the time that the plan for submission is prepared.
- 3.4 As well as setting the housing requirement for the plan period, the plan for submission will also include a trajectory to provide an indication of the timing of the delivery of the housing sites which are identified to meet the target. This will flow from the identification of the plan strategy and work on detailed site assessment and a greater understanding of the timing of the delivery of infrastructure needed to support growth.
- 3.5 Whilst more detailed work will be needed to determine this, we will consider whether, given the significant investment in infrastructure which would be necessary to deliver development in the borough at scale, a stepped trajectory approach may be appropriate for this plan. This could mean, for example, that the delivery target could be kept at 970 per year until 2030 and then increased to 1,580 dwellings per year to make up the rest of the plan requirement over the remaining 10 years. By 2030 the Black Cat Junction improvements will be complete, the East West Rail section through Bedford Borough will be complete (including new and re-modelled stations) and sufficient lead-in time will have been available for strategic projects to be planned in detail, enabling

these higher numbers to be achieved. The forward planning will include arrangements for new sustainable travel links, with the intention that these are available from day one in order to embed and promote sustainable travel choices.

- 3.6 In addition to setting the overall quantum of housing which is to be provided, a local plan must also contain advice on the level and type of affordable housing which is needed and how the needs of particular groups (such as older people and those in need of accessible housing) are to be met. The LHNA also provides the evidence base to update the policies of the Local Plan 2030 on these matters. Policy 58S Affordable housing and 59S Housing mix will be updated once the viability of the local plan as a whole has been tested.
- 3.7 This consultation is, however, primarily concerned with:
- determining how much employment land needs to be planned for,
  - how many homes need to be provided across the plan period,
  - what infrastructure would be needed to support this growth and
  - what, in the context of the vision and objectives outlined earlier in the document, is the appropriate spatial strategy for the plan.

#### **Level of employment growth required**

- 3.8 Taking account of planned population growth to 2040, the requirement for new employment land by that date is calculated to be 171 hectares (ha). Overall, the currently available supply of such land in the borough amounts to 48 ha leaving a requirement for 123 ha to be allocated in the local plan. Further detail on how this has been calculated is set out in the evidence base document Bedford Employment Land Study, March 2021, with a summary at paragraph 6.6 below.
- 3.9 The local plan must also plan for other growth requirements that may arise, for example additional shops and services, schools and transport infrastructure.

#### **Growth strategy options**

- 3.10 An important purpose of the local plan is to decide where in the borough growth should go. In last year's Issues and Options consultation the Council outlined six development locations which could form part of a strategy for growth. These were:
- Brown – Urban based growth
  - Yellow – A421-based growth
  - Pink – Rail-based growth

- Orange – East-West Rail northern station growth
- Grey – Dispersed growth
- Red – New settlement based growth

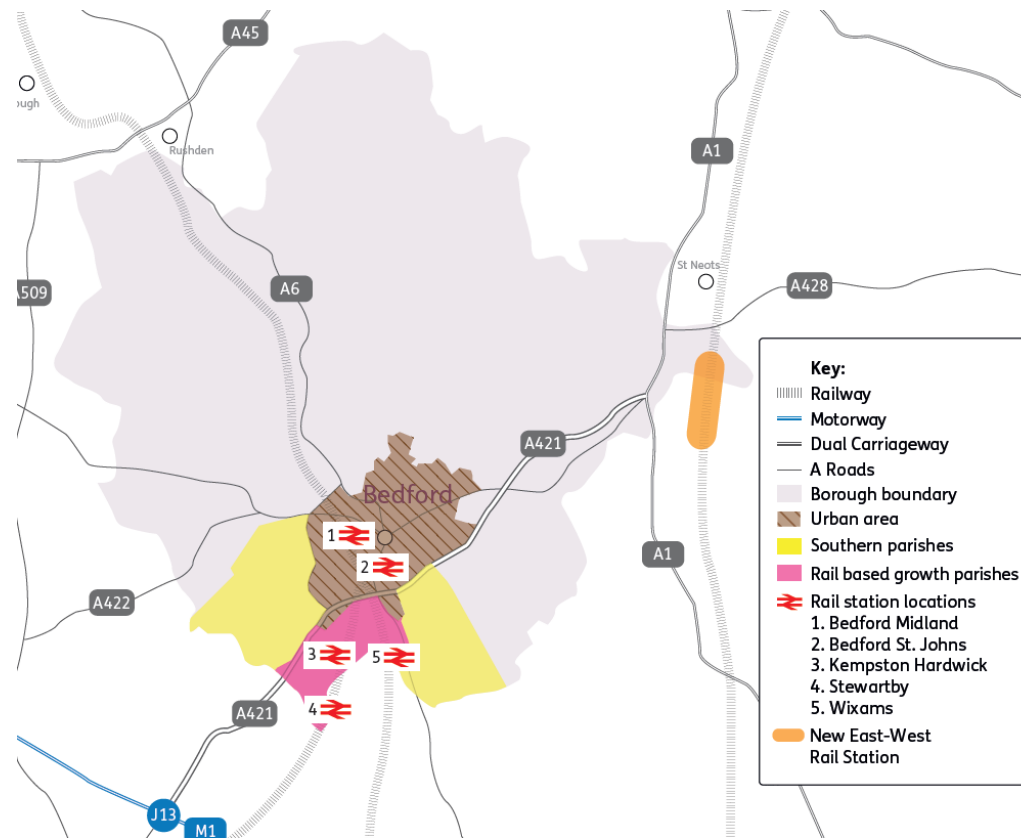
- 3.11 The responses to the issues and options consultation indicated that there was broad consensus favouring development focussed on the existing urban areas and the A421 corridor, and possible new railway stations which might be delivered on the new East-West Rail line. The responses are published in full on the Council's website at <https://www.bedford.gov.uk/planning-and-building/planning-policy-its-purpose/local-plan-review/> and a summary of the issues raised along with the Council's response can be found in the document Issues & Options Consultation - summary and responses, see Table 1.
- 3.12 Following the 2020 consultation, the Council commissioned consultants to assess the likely effects of four development scenarios on traffic flows in the borough. That work is published as the evidence base document Bedford Borough Transport Model Local Plan Assessment Summary Report (see Table 1). The report explains that four spatial scenarios, chosen for highway testing purposes, were assessed and it provides a high-level comparison of spatial growth scenarios looking at seven key transport metrics and identifies the mitigation measures that would be required by each scenario. The report offers a comparison between scenarios. More detail on these scenarios is included in the Development Strategy Topic Paper.
- 3.13 Based on the building blocks of the development locations previously consulted upon, we have undertaken further work to define in more detail a range of potential alternative spatial strategies for the plan. These are set out in the Development Strategy Topic Paper, which also explains how they have been derived.
- 3.14 As a result of this work there are seven draft alternatives which vary in their focus, from concentrating growth in the urban area, to growth in villages and at new settlements in the A6 and A421 corridors. For some alternatives, more than one option is available.
- 3.15 Currently, based on work we have undertaken to date, the emerging preferred options (taken from the longer list in the Development Strategy Topic Paper) are below.
- 3.16 We would like your views on which of the alternatives / options should form the strategy of the local plan. We still have more work to do over the coming months to determine the best growth strategy for Bedford Borough and will take into consideration your comments before a decision is made. To help inform that decision, we have carried out an appraisal of the likely social, economic and environmental effects of each alternative and this may be helpful when considering the options. The results of that work are

published as the Draft Sustainability Appraisal Report, May 2021 (see Table 1).

- 3.17 If you think that there are other strategies we should be considering, please let us know. These may be ones set out in the Development Strategy Topic Paper or completely different alternatives.

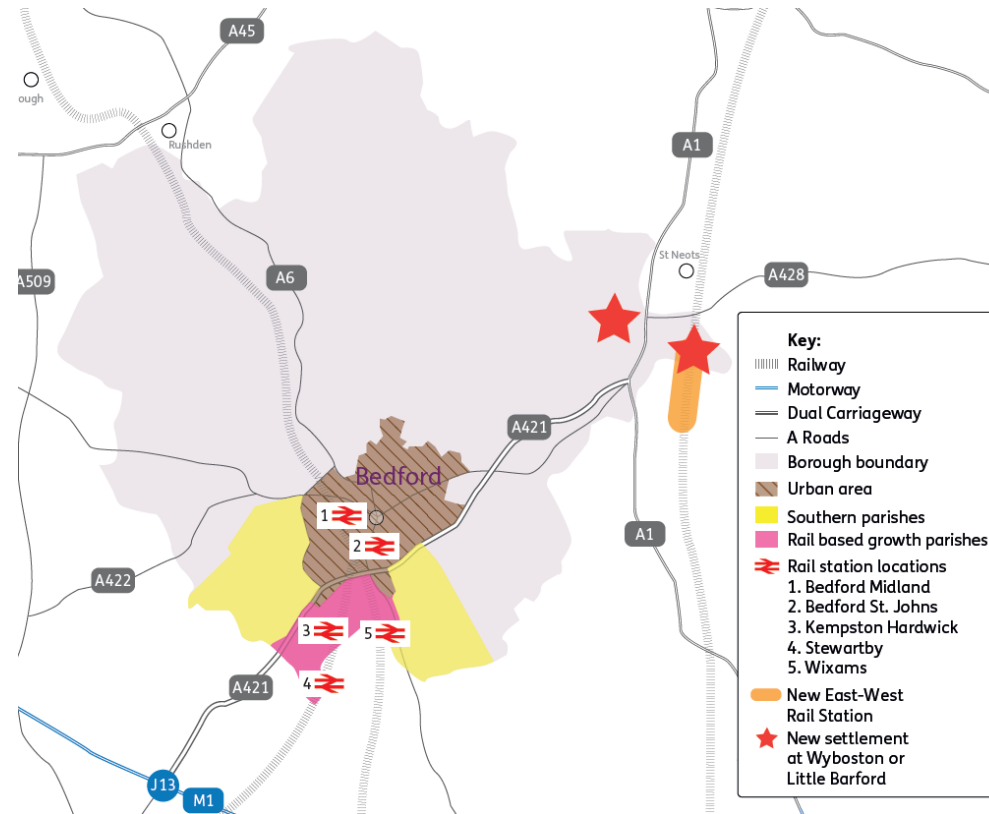
**Option 2a: Development in and around the urban area, plus A421 transport corridor with rail based growth parishes and southern parishes.**

- Within the urban area (1,500 dwellings).
- Adjoining the urban area (1,500 dwellings), up to 51 ha employment.
- Transport corridor – rail based growth: land within the parishes of Kempston Hardwick, Stewartby and Wixams (high option) (7,500 dwellings), up to 80 ha employment.
- Transport corridor – south: land within the parishes of Cotton End, Elstow, Kempston Rural, Shortstown, Wilstead and Wootton (2,000 dwellings).
- Total 12,500 dwellings and up to 131 ha employment



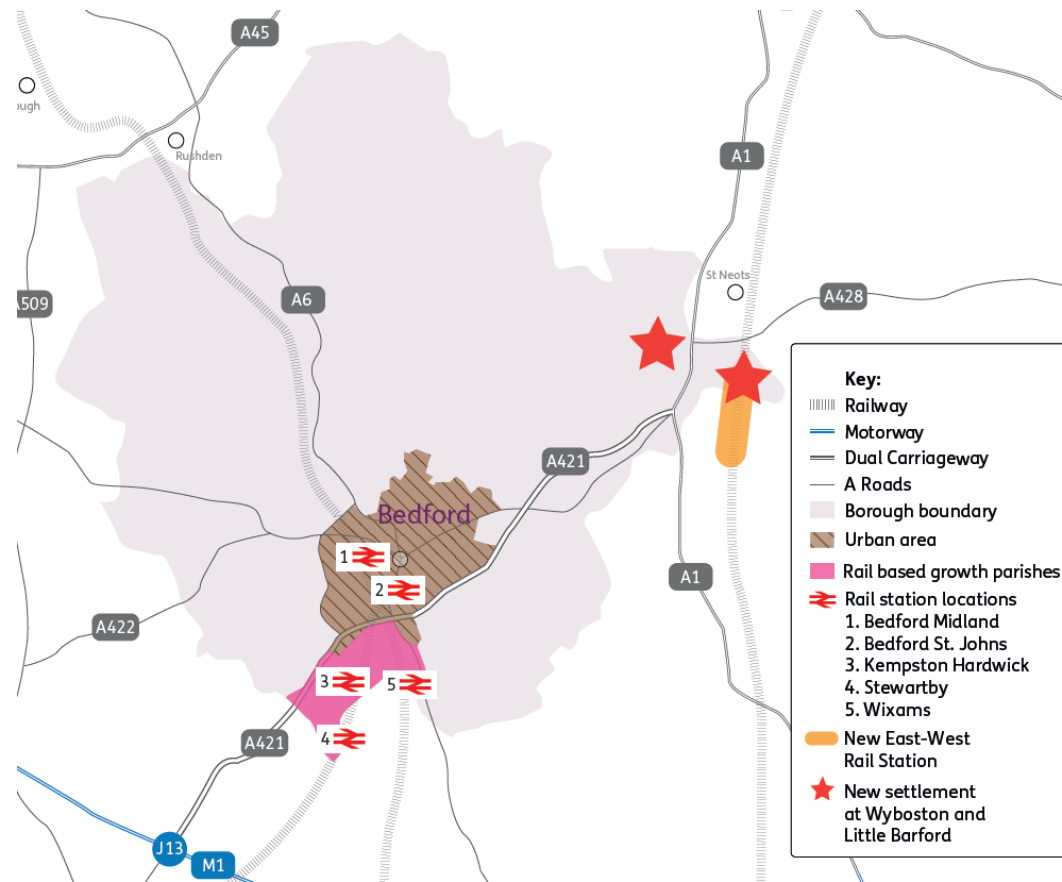
**Option 2b: Development in and around the urban area, plus A421 transport corridor with rail based growth parishes and southern parishes, plus one new settlement.**

- Within the urban area (1,500 dwellings).
- Adjoining the urban area (1,500 dwellings), up to 51 ha employment.
- Transport corridor – rail based growth: land within the parishes of Kempston Hardwick, Stewartby and Wixams (low option) (5,500 dwellings), up to 80 ha employment.
- Transport corridor – south: land within the parishes of Cotton End, Elstow, Kempston Rural, Shortstown, Wilstead and Wootton (1,500 dwellings).
- New settlement at Little Barford (3,085 dwellings) or Wyboston (2,500 dwellings), up to 20 ha employment.
- Total between 12,500 and 13,085 dwellings and up to 151 ha employment.



**Option 2c: Development in and around the urban area, plus A421 transport corridor with rail based growth parishes, plus two new settlements.**

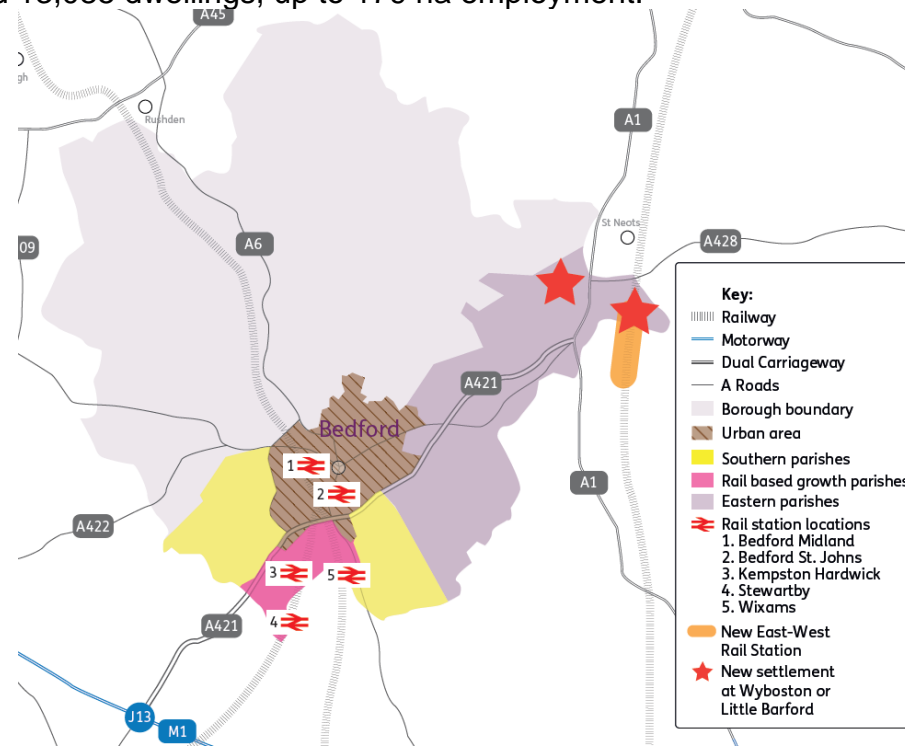
- Within the urban area (1,500 dwellings).
- Adjoining the urban area (1,500 dwellings), up to 51 ha employment.
- Transport corridor – rail based growth: land within the parishes of Kempston Hardwick, Stewartby and Wixams (extra low option, this being the residual required to meet need) (3,915 dwellings), up to 80 ha employment.
- New settlements at Little Barford (3,085 dwellings) and Wyboston (2,500 dwellings), up to 20 ha employment.
- Total 12,500 dwellings, up to 151 ha employment.





**Option 2d: Development in and around the urban area, plus A421 transport corridor with rail based growth parishes, southern parishes and east parishes, plus one new settlement.**

- Within the urban area (1,500 dwellings).
- Adjoining the urban area (1,500 dwellings), up to 51 ha employment.
- Transport corridor – rail based growth: land within the parishes of Kempston Hardwick, Stewartby and Wixams (low option) (5,500 dwellings), up to 80 ha employment.
- Transport corridor – south: land within the parishes of Cotton End, Elstow, Kempston Rural, Shortstown, Wilstead and Wootton (750 dwellings).
- Transport corridor – east: land within the parishes of Cardington, Cople, Great Barford, Little Barford, Roxton, Willington and Wyboston (750 dwellings), up to 28 ha employment.
- New settlement at Little Barford (3,085 dwellings) or Wyboston (2,500 dwellings), up to 20 ha employment.
- Total between 12,500 and 13,085 dwellings, up to 179 ha employment.



## Transport Strategy

- 3.18 Bedford is part of the England's Economic Heartlands (EEH) Sub-National Transport Body. The EEH Transport Strategy provides an overall framework for transport policies and delivery across the region. It is drafted so that planning and highway authorities can develop their own suite of policies and plans which reflect their individual local issues.
- 3.19 However, the over-riding ambition set out in the Strategy is that we have entered a once in a lifetime opportunity to shape the transport future and deliver change. The basic premise for transport investment is that business as usual will not get us to where we want to be and will not enable the area to fulfil its economic and sustainable growth potential.
- 3.20 What this means is that in order to deliver sustainable growth; transport investment, travel behaviour and the way we think about moving around will need to change. The impact of continuing with current travel behaviour will have a detrimental impact on the very things that make the area successful, including the attractive environment and the network of small and medium sized towns and cities across the Oxford to Cambridge Arc.
- 3.21 Increased economic activity and growing populations, if left to continue in traditional patterns of movement and behaviour, will mean people spend longer on congested transport networks, the environment will be degraded, and quality of life expectations will not be met.
- 3.22 The EEH Strategy includes a five-point plan of action which is supported by Bedford Borough Council. The five actions are:
- Focus on **decarbonisation** of the transport system by harnessing innovation and supporting solutions which create green economic opportunities
  - Promote investment in digital infrastructure as a means of improving connectivity, in order to **reduce the need to travel**
  - Use delivery of **East West Rail** and mass rapid transit systems as the catalyst for the transformation of our strategic public transport networks
  - Champion increased investment in active travel and shared transport solutions to **improve local connectivity** to ensure that everyone has the opportunity to realise their potential
  - Ensure that our **freight and logistics needs continue to be met** whilst **lowering the environmental impact** of their delivery
- 3.23 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. The following overarching principles provide a framework for Bedford's existing transport policies, and are able to support both the requirements to reduce the need to travel and the provision of good quality infrastructure which can support the needs of the economy and the environment:

Principle 1 - Support delivery of low carbon transport by working towards reduced congestion, digital connectivity, and a net zero carbon system by 2040

Principle 2 – Promote connectivity and accessibility in new development, and link new and existing communities

Principle 3 – Support opportunities for active travel and green infrastructure

Principle 4 – Promote and support infrastructure development which reflects the ambitions of the three preceding principles.

- 3.24 The current policies contained in the adopted development plan have been reviewed and are felt to be sufficiently robust to deliver the above principles. As a result they do not need to change. More detail can be found in the Development Strategy Topic Paper.
- 3.25 An initial review of the transport schemes needed to support local plan growth has been included in the scenario modelling undertaken by the Council's transport consultant and is available as appendices to the reports they have produced (see Table 1). Further work will be undertaken to inform the spatial strategy of the plan and the Infrastructure Delivery Report which will accompany it.

#### **Housing development on small sites**

- 3.26 The Council is required by the National Planning Policy Framework to deliver 10% of its housing requirement on small sites (sites no larger than one hectare). This is to create diversity in the type of sites that will be developed across the borough, encourage activity from smaller and medium sized businesses and generate a consistent year-on-year supply of houses, particularly when it is known that larger sites can have a significant lead in time before development commences.
- 3.27 Work has been undertaken to determine the number of completions delivered on sites of one hectare or less over recent years and this has demonstrated that there is a strong link between windfall and small sites' delivery for the borough. Development sites which have not been allocated as part of the local plan process are called 'windfall sites'. They normally comprise previously-developed sites that have unexpectedly become available. For the monitoring years 2015-2020 the number of dwellings built on small sites was consistently above 10% of the annual housing requirement. At 31 March 2020, 24.1% of housing supply was on small sites. Further detail is set out in the Small Sites Topic Paper.
- 3.28 As a consequence, the Local Plan 2040 will not include allocation policies for small sites simply to satisfy this specific requirement of government policy, as we expect sufficient small sites to continue to be delivered as a result of windfall development. Small sites may however be allocated in accordance with development strategy, once it is finalised.

## 4.0 Site allocations and call for sites

- 4.1 Alongside last year's issues and options consultation the Council invited landowners, developers and their consultants to submit information about sites that could be available to meet the borough's growth needs.
- 4.2 In response over 430 sites were submitted and information about them is published on the Council's website at <https://www.bedford.gov.uk/planning-and-building/planning-policy-its-purpose/local-plan-review/>. Further details of the way in which sites will be selected are given in the Site Selection Methodology, June 2021 (see Table 1).
- 4.3 We have undertaken a large part of the site assessment work and you can view this by looking at the Council's [interactive call for sites map](#). When you select a site you will see that an additional tab called 'site assessment' has been created. More information will be added as it becomes available.
- 4.4 If you have any comments on the sites or the assessment that has been carried out to date, please let us know by accessing the 'Site Assessment Pro formas' document on the Council's Opus Consult Consultations [home page](#). You can leave comments against the site or sites you are interested in. If you have any queries about how to use this system, please see the [help guide](#).
- 4.5 The assessment of sites is also available as a PDF document and you can use this if you prefer. Please make sure you give the site reference number if you choose this option and wish to comment on a site.
- 4.6 When added together, the sites which have been submitted for potential housing development total far more dwellings than need to be allocated in this plan, and therefore many of them will not be required for development. However, specific site allocations can only be fixed once consultation comments have been considered and the strategy is firmed up.

## 5.0 Town Centre & Retail Policies

### Recent changes

- 5.1 The long-term trends affecting town centres identified in Local Plan 2030 have not changed. Centres are still challenged by the rise in internet shopping, the concentration of national chain retailers in larger retail centres outside of the borough and competition from out of centre shops. However, these pressures have been intensified in recent months by Covid-19-related lockdowns and the reluctance of people to visit crowded areas. As a result, a number of businesses have had to close permanently and vacancy levels have risen.
- 5.2 In response, the government has provided support to town centres through a number of initiatives. It has also introduced greater flexibility in the uses that can occupy shop units by creating a new use class for commercial, business and service uses. The government's Towns Deal Fund aims to drive the economic regeneration of towns across the country and Bedford was selected to bid for funding. A number of regeneration projects have been put forward and the government's decision is awaited.
- 5.3 The Council has also produced a Bedford Town Centre Plan which sets out a series of actions to tackle challenges facing the town centre. These cover the six themes of environment, regulation and property, promotion, strategy, connectivity and events. It sets out the Council's vision for the town centre as "Bedford - a place to live, work, shop, learn and explore".
- 5.4 As part of this local plan review the Council asked the public about the issues facing town centres and retailing in the borough. A wide range of comments were made and these can be grouped into the following areas:
- focussing on niche and independent small businesses
  - enhancing physical and cultural features
  - promoting events and activities, community space and leisure facilities
  - increasing the number of town centre dwellings
  - managing the night-time economy to reduce disturbance
  - making the town safer
  - increasing green spaces
  - improving cleaning and maintenance
  - promoting sustainable transport
- 5.5 These comments have informed the Council's work on regenerating and promoting town centres, and also the policy approach of the local plan.

5.6 This section sets out an up-to-date planning policy approach that responds to the issues facing town centres. The Council is aware of the forthcoming changes to permitted development rights due to come into effect in August 2021, which will permit the change of use of particular town centre uses to residential use for units up to a certain size. The Council will assess the impact of this on its draft policies before finalising the local plan.

**Hierarchy of town centres**

5.7 The Bedford Town Centre Study commissioned by the Council (see Table 1) confirms that the town centre hierarchy set out in Local Plan 2030 remains appropriate. It confirms that Bedford town centre is the main focus for retailing in the borough. In order to maintain and enhance its role, it is important that the primary shopping area of Bedford town centre continues to be the preferred location for new retail development and other town centre uses.

5.8 Kempston (the Saxon Centre together with parades on Bedford Road and Bunyan Road) continues to perform the role of a district centre. In addition, the Council has identified a number of local centres which serve smaller catchment areas. Five local centres are designated within the Bedford urban area, whilst in the rural parts of the borough a number of key service centres are designated which serve their surrounding rural areas. Remaining groupings of shops which are of purely neighbourhood significance are identified as neighbourhood centres. Wixams new settlement is identified as a potential key service centre as, over the course of the Plan period, the planned town centre is expected to be constructed and, once completed, will serve the settlement and wider rural area.

5.9 Town centre boundaries are shown on the [Policies Map](#). These are important for the operation of the government’s ‘town centres first’ policy.

**Policy TC1S\* – Hierarchy of town centres**

The hierarchy of centres is as follows –

<i>Type of centre</i>	<i>Designated centres</i>
1) Strategic centre	Bedford town centre

2) District centre	Kempston (including the Saxon Centre, Bedford Road and Bunyan Road)
3) Local centres	<p><u>Urban centres</u></p> <p>Castle Road, Bedford  Church Lane, Bedford  Ford End Road, Bedford  Midland Road (west), Bedford  Tavistock Street, Bedford</p> <p><u>Key service centres</u></p> <p>Bromham  Clapham  Great Barford  Sharnbrook  Shortstown  Wilstead  Wixams (proposed new town centre)  Wootton</p>
4) Neighbourhood centres	Remaining centres (small parades of shops of purely neighbourhood significance which are not town centres in retail policy terms)

New main town centre uses<sup>1</sup> are required to locate in Bedford town centre, Kempston district centre and the local centres. If no suitable sites are available, edge of centre<sup>2</sup> locations should be considered.

Development should contribute positively to the vitality and viability of the centre, and should be appropriate to the scale, character and function of the centre.

<sup>1</sup> Main town centre uses: Defined in the National Planning Policy Framework as retail, office, leisure and entertainment facilities (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres, bingo halls), and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

<sup>2</sup> Edge of centre: For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of the town centre boundary.

\*The suffix 'S' is used to show that this is a strategic policy

### **Amount of development required**

- 5.10 The town centres' study has assessed future needs for new retail floor space in the borough over the plan period taking account of expected population growth, competition from other centres, internet shopping and unimplemented planning permissions. The study shows that there is insufficient quantitative demand to support the provision of additional convenience goods floor space in the immediate future, but that by 2030 demand could support up to 2,500 sq m net additional floor space, increasing to 5,800 sq m net by 2040.
- 5.11 For comparison goods, quantitative demand to support the provision of additional floor space does not arise until after 2035 and only by 2040 could there be demand to support up to 12,400 sq m net floor space. The town centres' study advises that the use of long-term projections should be treated with caution and reviewed regularly in order to test the accuracy of the forecasts against emerging datasets.
- 5.12 The town centres' study also includes an assessment of the need over the plan period for new commercial leisure facilities (including leisure and entertainment facilities such as cinemas, restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowl centres, bingo halls, theatres and concert halls). The study concludes that for most commercial leisure categories there is already adequate provision.

### **Location of development**

- 5.13 Government guidance in the National Planning Policy Framework advocates a 'town centres first' approach to the location of new retail, office and leisure uses defined as 'main town centre uses' (known as the sequential test). It requires planning policies to promote the long-term vitality and viability of town centres, meeting anticipated needs for town centre uses in or on the edge of centres where sites are available or otherwise in other accessible locations that are well connected to the town centre. The town centres' study has considered potential development opportunities in and on the edge of Bedford town centre and no sites additional to those allocated in Local Plan 2030 have been identified.



- 5.14 If there is demand later in the plan period for retail and other town centre development, and there are no suitable vacant units available in and on the edge of town centres, then the Council accepts that that development will occur in accessible out of centre locations that are well-connected to the town centre in accordance with government guidance.
- 5.15 It is recognised that certain uses that are defined in the National Planning Policy Framework as ‘main town centre uses’ and therefore expected to locate as a preference in town centres, may have particular market and locational requirements which mean that exceptionally they may only be accommodated in specific locations. This may particularly be the case for bulky goods retailing and certain types of office and leisure development that require a parkland or main road setting. These types of development have specific needs that often cannot easily be accommodated in town centre locations. Furthermore, the business model of some commercial, business and service uses means that they prefer not to locate in a town centre. In such cases the Council will encourage them to locate in edge of centre locations and within easy walking distance of a town centre in accordance with the National Planning Policy Framework.
- 5.16 To ensure that out of centre development does not have an adverse impact on town centres, the National Planning Policy Framework states that proposals for new retail, leisure and office development should consider the impact on town centre vitality and viability, as well as on existing, committed and planned investment in centres in the catchment area of the proposal. The town centres’ study has confirmed that for retail proposals the locally set thresholds in Local Plan 2030 remain appropriate given the vulnerabilities of the various centres.
- 5.17 Proposals for out of centre retailing will be expected to include details of the nature of the use proposed so as to demonstrate that the requirements of the sequential test are met. To ensure that a development does not change its character unacceptably in ways that would create a development that should have been refused on grounds of adverse impact on the vitality and viability of an existing centre, it may be appropriate to grant planning permission subject to conditions limiting the type of goods to be sold and preventing the development being subdivided.

#### **Policy TC2 – Out of centre development**

New retail, leisure and office development is required to locate in Bedford town centre, Kempston district centre and the local centres as defined in Policy TC1S – Hierarchy of town centres. If no suitable sites are available, edge of centre\* locations should be considered. Only if suitable sites are not available should out of centre sites be considered. These should preferably be accessible sites which are well connected to the town centre. Certain uses that have particular market and locational requirements may exceptionally be permitted in out of centre locations subject to sufficient justification.

Any retail and leisure development proposed outside of the defined town centres must be subject to an impact assessment if it exceeds the following thresholds.

For leisure development the threshold is 2,500 sq m gross floor space.

For retail development:

- i. If the nearest centre to the proposed development is Bedford town centre or Kempston district centre, the threshold is 500 sq m net floor space.
- ii. If the nearest centre to the proposed development is a local centre, the threshold is 200 sq m net floor space.

The assessment will relate to the impact on Bedford town centre, Kempston district centre and local centres within the catchment and demonstrate that development will not have a significant adverse impact on town centre vitality and viability or existing, committed and planned investment in the centres. Proposals for new retail development permitted in accordance with this policy will, where necessary, be subject to conditions to ensure that the development does not subsequently change its character unacceptably. Such conditions may limit the type of goods to be sold and prevent the development being subdivided.

\* Edge of centre: For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of the town centre boundary.

### **Bedford town centre**

- 5.18 The extent of Bedford town centre is shown on the Policies Map. This encloses the area predominantly occupied by main town centre uses, which are defined in the National Planning Policy Framework as: retail, office, leisure and entertainment facilities (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres, bingo halls), and arts, culture and tourism development (including theatres, museums, galleries, concert halls, hotels and conference facilities). The area is unchanged from that defined in Local Plan 2030.
- 5.19 A primary shopping area is also defined on the Policies Map, which encloses the area where retail activity is concentrated within the town centre. Retail uses are expected to locate as a preference within the primary shopping area. By defining a primary shopping area, the aim is to retain a core of activity, which is one of the main attractions and purposes of the town centre.
- 5.20 Within the town centre a range of uses appropriate to a town centre location will be encouraged. Allowing a wide range of uses will reduce vacancies and increase flexibility, giving niche retailers the freedom to locate where it best suits them. However, it is important to avoid a concentration of similar uses which might have a cumulative impact on such things as environmental quality,

amenity or parking, or would increase the risk of anti-social behaviour and reduce the vitality, viability and diversity of the town centre.

- 5.21 Residential use should primarily be above ground floor level because of the importance of maintaining active frontages at street level, however outside of the primary shopping area, residential use at ground floor level may also be appropriate if it would not adversely impact the vitality and viability of the town centre as a whole.

### **Policy TC3 – Bedford town centre – changes of use**

Within Bedford town centre a range of uses will be supported provided that:

- i. They contribute to the vitality, viability and diversity of the town centre, and;
- ii. They avoid the concentration of similar uses whose cumulative impact would be to the detriment of environmental quality, amenity or parking, or would increase the risk of anti-social behaviour.

Acceptable uses in the town centre are likely to include: commercial, business and service uses, hot food takeaways, public houses, night clubs, cinemas, theatres, concert halls, community uses, educational uses and other uses appropriate to a town centre.

Residential use will be supported above ground floor level throughout the town centre, provided that the use would have safe and convenient access and would not inhibit the functioning of the ground floor use. Outside of the primary shopping area residential use at ground floor level may also be appropriate if it can be shown that the proposed residential use would not adversely impact the vitality and viability of the town centre as a whole.

### **Local shopping**

- 5.22 Government guidance in the National Planning Policy Framework recognises the importance to communities of local shopping facilities which provide for people's day-to-day needs. Local plans should promote the retention and development of local shops in local centres and villages. Local shopping facilities reduce the need for residents to travel and are particularly important for those with mobility difficulties or who do not have access to a car. Local shops are also valuable for 'top-up' shopping trips for mobile, car-owning households. Policy TC1S (Hierarchy of town centres) identifies district, local and neighbourhood centres as being important for local shopping.

- 5.23 The town centres' study supports the identification of Kempston (Saxon Centre together with parades on Bedford Road and Bunyan Road) as a district centre. As a town centre, Kempston district centre is a preferred location for new retail development. The town centre boundary is shown on the Policies Map and is unchanged from that defined in Local Plan 2030. A primary shopping area has not been defined for Kempston district centre as its size does not justify it.
- 5.24 Residential use should primarily be above ground floor level because of the importance of maintaining active frontages at street level, however in fringe areas of the district centre, residential use at ground floor level may also be appropriate if it would not adversely impact the vitality and viability of the centre as a whole.

**Policy TC4 – Kempston district centre – new commercial, business and service use development**

Proposals for new commercial, business, service and other uses appropriate to the district centre will be supported if:

- i. New development will enhance the appearance of the district centre; and
- ii. New development will be of a scale and form which is appropriate to the function of the district centre; and
- iii. Satisfactory servicing and car parking facilities can be provided to avoid on-street congestion and to protect highway safety; and
- iv. The proposal will be accessible by a choice of means of transport other than the private car.

**Policy TC5 – Kempston district centre – changes of use**

Within the district centre a range of uses will be supported provided that:

- i. They contribute to the vitality, viability and diversity of the district centre; and
- ii. They avoid the concentration of similar uses whose cumulative impact would be to the detriment of environmental quality, amenity or parking, or would increase the risk of anti-social behaviour.

Acceptable uses in the district centre are likely to include: commercial, business and service uses, hot food takeaways, public houses, night clubs, cinemas, theatres, concert halls, community uses, educational uses and other uses appropriate to a town centre.

Residential use will be supported above ground floor level throughout the district centre, provided that the use would have safe and convenient access and would not inhibit the functioning of the ground floor use. In fringe areas of the district centre residential use at ground floor level may also be appropriate if it can be shown that the proposed residential use would not adversely impact the vitality and viability of the centre as a whole.

- 5.25 After Bedford town centre and Kempston district centre, Policy TC1S (Hierarchy of town centres) identifies the largest centres within the urban area as local centres. These have a good range of shops that are locally important, together with non-retail services and local public facilities. As town centres, they are the preferred locations for new retail development. The boundaries of the centres are shown on the Policies Map. These are unchanged from those defined in Local Plan 2030. Primary shopping areas have not been defined for local centres as their restricted geographical extent does not warrant it. The aim of Policy TC7 is to protect the diversity of uses and ensure that the vitality and viability of local centres is not adversely affected by changes of use.
- 5.26 In rural areas, key service centres also perform the role of local centres and are important in serving their surrounding rural areas. Town centre and primary shopping area boundaries have not been defined for such centres because the town centre uses within them are often dispersed. They are instead protected by Policy TC7 which applies to all shops associated with the centre.

#### **Policy TC6 – New commercial, business and service uses in local centres**

Proposals for new commercial, business, service and other uses appropriate to a local centre within or on the edge of existing local centres, or in existing or proposed new residential areas where there is a local need, will be supported if the proposal is of a scale appropriate to the role and function of the centre and is intended primarily to serve the needs of the local community.

#### **Policy TC7 – Local centres (including key service centres) – changes of use**

Within local centres a range of uses will be supported provided that:

- i. They contribute to the vitality, viability and diversity of the centre; and
- ii. They avoid the concentration of similar uses whose cumulative impact would be to the detriment of environmental quality, amenity or parking, or would increase the risk of anti-social behaviour.

Acceptable uses in local centres are likely to include: commercial, business and service uses, hot food takeaways, public houses, community uses, educational uses and other uses appropriate to a local centre.

Residential use will be supported above ground floor level throughout local centres, provided that the use would have safe and convenient access and would not inhibit the functioning of the ground floor use. In fringe areas of local centres residential use at ground floor level may also be appropriate if it can be shown that the proposed residential use would not adversely impact the vitality and viability of the centre as a whole.

- 5.27 Neighbourhood centres, which can be either in rural or urban areas, are smaller centres which have a small catchment serving local needs and are of purely neighbourhood significance. They are not considered to be town centres in policy terms and are not defined on the Policies Map, nevertheless the essential shops within them can be important for those who do not have access to a car or for 'top-up' shopping trips. Smaller groupings of shops which are not large enough to form a centre, together with individual shops may also be important locally where they provide for essential needs.
- 5.28 In 2020 the government established new Use Class F2 which includes small shops of under 280 sq m floor space mostly selling essential goods, including food, where there is no other such facility within 1000 m distance. The creation of a separate class for such uses means that planning permission is needed before they can be used for other purposes. Public houses can also be important for local communities, particularly in rural areas. The aim of Policy TC8 therefore is to maintain essential local shops and public houses which are important for the local community and where there are no others nearby.

#### **Policy TC8 – Essential local shops and public houses – changes of use**

The Council will only grant planning permission for the change of use of essential local shops within Class F2 or public houses to other uses when:

- i. There is an alternative facility within 1000 metres providing a similar service; and
- ii. The applicant can demonstrate to the satisfaction of the Council that the current (or last) use is no longer economically viable (including in appropriate circumstances financial information); this can best be demonstrated by providing evidence that the property has been actively and appropriately marketed; and
- iii. The use would not lead to the concentration of similar uses whose cumulative impact would be to the detriment of environmental quality, amenity or parking, or would increase the risk of anti-social behaviour.

### **Impact of town centre uses**

- 5.29 In order to avoid any over-concentration of unneighbourly facilities, for example restaurants and hot food takeaways, and to maintain residential amenity close to residential areas, it may be necessary to restrict the opening times of town centre uses. In addition it will be important that restaurants and hot food takeaways provide appropriate refuse facilities.

#### **Policy TC9 – Impact of town centre uses**

Town centre uses\* will be supported where they will not give rise to a detrimental effect (either individually or cumulatively) on adjacent uses or the character and amenity of the area through noise, smell, litter, traffic problems or other side effects. The Council will consider restricting the opening hours of premises where necessary.

This policy applies to town centres, neighbourhood centres and individual shops throughout the borough.

\* Town centre uses: Defined in the National Planning Policy Framework as retail, office, leisure and entertainment facilities (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres, bingo halls), and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

## 6.0 Employment

- 6.1 In order to gain a clear understanding of employment in the borough, the Council undertook a study to look at Bedford's position in the wider area, the pattern of employment in the borough and the need for additional employment land. Further detail is set out in the evidence base document Bedford Employment Land Study (see Table 1).
- 6.2 The Bedford Employment Land Study shows that the economy of Bedford is diverse and generally vibrant. The borough has a skilled workforce, an above average rate of employment and high proportion of 'top level' occupations. Bedford benefits from good strategic connections to London and nearby economic centres, such as Milton Keynes and Luton, and planned improvements to connect to Cambridge. However, the labour market is very self-contained with about two-thirds of the population working within the borough. At the time of the last census in 2011 the key employment sectors in Bedford were wholesale and retail trade, health / social work and education. Despite having a skilled workforce, a smaller proportion of residents is employed in skilled sectors such as finance and insurance activities, professional, scientific and technical activities, and information and communication, than in nearby areas. This suggests that of the third of the population who work outside the borough, a higher proportion may be from 'top level' occupations.
- 6.3 The functional economic and market areas of the borough are not the same, with the reach and relationship between Bedford and other local authority areas defined by a complex set of business, market and people dynamics. The commercial market for logistics development is large, stretching from the edge of London to Daventry and from Milton Keynes to Cambridge. However, the reach and influence of the office market is very localised because of the proximity of a number of larger centres. In labour market terms there is a much narrower, local focus, with relationships primarily extending into the neighbouring districts, with the exception of commuting to London.
- 6.4 The main focus of the study was current 'B' class employment land supply and the need for additional floor space in the future. Although during the course of 2020 the government revised the Use Classes Order, including class B1 (business) with a number of town centre type uses in a new class E, the study continued to include the former class B1 along with the other remaining B classes to enable easier assessment of employment need. Between 2020 and 2040 83% of jobs growth is predicted to be in the non-"B" class uses sector, whereas only 17% of growth is predicted to arise within the "B" use classes which traditionally require site specific allocations to ensure that appropriate sites are provided. The study estimates a requirement for 8,642 additional jobs in the borough between 2020 and 2040.



- 6.5 The study evaluates existing and allocated employment sites and calculates the amount of employment land needed to meet the “B” use class jobs target taking into account likely future losses. The study includes sensitivity testing of the impact of delivery at different development densities and the impact of a different distribution of employment growth between the “B” use class sectors.
- 6.6 Taking account of planned population growth to 2040, the land supply requirement for “B” class uses varies between 103 ha and 208 ha depending on the assumptions applied. A requirement of 171 ha is concluded to be the most appropriate as this recognises that there are likely to be few opportunities or demand for high density office development in the borough and that most B1 development is likely to be within lower density business park sites. Provision towards meeting some of the land supply requirement already existing in the form of allocations carried forward from the Allocations and Designations Local Plan, 2013. These have been re-appraised to check that they are still suitable, available and achievable. Overall available supply currently amounts to 48 ha leaving a requirement for 123 ha to be allocated in the local plan.
- 6.7 The Council’s view is that the expected nature of future demand will require a range of large scale, well located sites that are well connected to transport networks and the strategic road network in particular. These sites will have to be able to provide a landscaped business park environment that is suitable for high technology firms requiring easy access to research and development hubs across the Oxford – Cambridge corridor. They will also include an element of non-B class uses to enable them to satisfy occupiers’ daily needs.
- 6.8 Given Bedford’s central location in the corridor and good (and improving) transport links, the Council considers that the local plan should provide three new business park sites, each of about 30 ha. The remaining 63 ha should be allocated in smaller sites which are more likely to be attractive for office and general industry purposes. Allocations should include land for a centrally located educational spin-out centre linked to a science / innovation business park taking advantage of Bedford’s enhanced east-west connectivity across the Oxford and Cambridge corridor. The Council’s view is that new allocations for large-scale warehousing are not appropriate because of the focus in this local plan on enabling higher skilled job opportunities in the borough. Looking at the broader context, there are already extensive opportunities for new warehousing and distribution facilities in nearby local authority areas (including Central Bedfordshire) which supports this approach.
- 6.9 As mentioned above potential employment sites are still being assessed. Once a strategy is chosen, appropriate sites for allocation will be identified in the plan for submission.
- 6.10 Given the revised assessment of the need for employment land it will be necessary to update Policy 69S of Local Plan 2030.

### **Policy E1S - Amount and distribution of employment development**

A minimum of 8,642 net additional jobs will be provided to 2040.

- i. The main focus for jobs growth will be in accordance with the plan's development strategy.
- ii. Applications for B use class employment on sites that are not allocated will be determined in accordance with Policy 72S of Bedford Local Plan 2030. Proposals for non-B class employment on key employment sites will be determined in accordance with Policy 70 of Bedford Local Plan 2030.

- 6.11 In September 2020 the government revised the Use Classes Order, creating a new class E (commercial, business and service uses) which combines class B1 (business) with classes A1-A3 (shops, financial and professional services, and restaurants and cafés), part of class D1 (non-residential institutions) and part of class D2 (assembly and leisure). As a result planning permission is no longer required to change from one of these uses to another as they all now fall within the same use class. The remaining B class uses, B2 (general industry) and B8 (storage or distribution) remain unchanged.
- 6.12 The remaining policies of Local Plan 2030 remain appropriate and do not need replacement. However, many of them make reference to class B. These should now be read as meaning classes B2, B8 and business uses within class E.

## 7.0 Development management policies

7.1 This section contains new or replacement development management policies.

### **Self-build and custom housebuilding**

7.2 The Self-build & Custom Housebuilding Act 2015 introduced the concept of an individual's Right to Build and the requirement on Local Authorities to keep a register of both individuals and associations who are seeking to do so. It has since been amended by the Housing and Planning Act 2016.

7.3 Further regulations<sup>4</sup> require Local Authorities to grant sufficient planning permissions for self- and custom-build plots to meet annual register-evidenced demand.

7.4 Councils are required to have regard to the register when carrying out their functions relating to planning, housing, the disposal of the authority's land and regeneration.

7.5 Self-build and custom housebuilding is defined in the Self-Build and Custom Housebuilding Act 2015 as:

the building or completion by—

(a) individuals,

(b) associations of individuals, or

(c) persons working with or for individuals or associations of individuals, of houses to be occupied as homes by those individuals.

7.6 Self-build is where individuals or associations of individuals, including those in community-led projects, are directly responsible for the design and construction of their own homes. These may be traditional DIY self-build homes where the eventual occupiers carry out all or much of the project management; construction and finish or increasingly where a self-builder commissions all or much of the work employing others to carry out the actual build for them.

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<sup>4</sup> Self-build and Custom Housebuilding Regulations 2016 and the Self-build and Custom Housebuilding (Time for Compliance and fees) Regulations 2016

- 7.7 Custom build homes are where developers, builders or industry specialist 'home-builders' work with individuals or associations to deliver finished or shell homes to a pre-agreed bespoke design standards and quality of finish. The developer may provide a plot, manage the construction and arrange the finance for the new home as a package. Whilst this is therefore more of a hands-off approach for the final occupier, the homes will still be tailored from initial inception to match an individual's requirements, within certain agreed parameters.
- 7.8 Whether self or custom-build, the instigators, funders or commissioners of the work must be the occupiers of the dwelling.
- 7.9 The Council introduced its Self-build and Custom Homebuilding Register in April 2016 and following recent consultation, divided it into 2 parts:
- Part 1 – requires evidence by the individual or association to demonstrate a defined local connection to the area. Registrants on part 1 will be given first refusal on self-build plots that become available in the borough either through the application of Policy SB1 (below) or as a result of the Council disposing of its own land (where it is suitable for and is being disposed of for self- build).
- Part 2 – Other individuals or associations that have an interest in self-build plots in the borough but who do not have the required local connection to the area. Any plots that are available but are not taken up by anyone on part 1 of the register will then be offered to those on part 2 before being more widely marketed.
- 7.10 Neighbourhood Plans may also allocate sites for self-build and/or custom housebuilding plots and where this is so, developers will be required to have regard to relevant policies and marketing requirements.
- 7.11 The Council has a duty to provide serviced plots to meet the demand on Part 1 of its Self-build and Custom Housebuilding Register but will take into account the demand shown by both parts of the register in considering planning applications. To help to do this, the Council will require qualifying developments to make available serviced plots specifically to provide self-build and custom housebuilding opportunities. The number of serviced plots to be made available will be determined by the capacity of the site.
- 7.12 The policy sets out marketing requirements for advertising the availability of self-build and custom housebuilding plots. These broad requirements differ depending on the number of dwellings proposed for a site. On sites of 49 dwellings or fewer, the timetable for marketing plots will generally be shorter. This is due to the fact that smaller sites will build out faster, meaning there is a greater possibility that lengthier marketing would delay the delivery of dwellings.

- 7.13 Whilst the nature of some proposals, for example high density sites of predominantly apartments or conversions of existing buildings, might mean individual self-build plots may not be available or practical, such dwellings do provide opportunities for custom build. The Council therefore expects that all qualifying sites will meet the requirements of Policy SB1.

#### **Policy SB1 – Self-build and custom housebuilding**

i The Council will require applications for new housing development to include a number of plots for self-build and custom housebuilders in accordance with the following, based on the overall number of net-additional dwellings proposed:

- 1-4 dwellings = no requirement
- 5-9 dwellings = 1 plot
- 10-29 dwellings = 2 plots
- 30-49 dwellings = 3 plots
- 50-69 dwellings = 5 plots
- 70-89 dwellings = 6 plots
- 90-100 dwellings = 7 plots
- 100+ dwellings = by negotiation

ii Self-build and custom housebuilding plot sizes should take account of register evidenced demand;

iii All plots must be serviced with suitable connections to utilities such as water and drainage, electricity, gas and broadband;

iv Prior to commencement of development, developers will be required to agree a marketing plan with the Local Planning Authority that complies with the following:

- Self-build and Custom Housebuilding plots will be offered at an open value established by a RICS valuer
- Where an expression of interest in a plot has been rejected by the developer, evidence must be provided to the Local Planning Authority, upon request, as to why it was not suitable

For sites of 50 or more dwellings:

- Plots will be marketed solely to individuals and associations on Part 1 of the Council's Register in the first instance for an initial period of two months (minimum) from the commencement of the site being marketed. Following the initial marketing period, the offer of any unreserved plots will be extended to those on Part 2 of the Council's Register and any new registrants to Part 1 having joined during the initial period. If the developer can provide evidence to the satisfaction of the

Council that suitable purchasers from the Register have not been forthcoming within 6 months (minimum) of commencement of marketing the plots, they may be offered for unrestricted market sale to self-build and custom homebuilders including industry sector specialist companies

- Any plots not reserved within a further 6 months (minimum) will be released from this specific policy requirement, following a total of 12 months of marketing.

For sites of 49 or fewer dwellings:

- Plots will be marketed solely to individuals and associations on Part 1 of the Council's Register in the first instance for an initial period of 1 month (minimum) from the commencement of marketing.

- Following the initial marketing period the offer of any unreserved plots will be extended to those on Part 2 of the Council's Register and any new registrants to Part 1 having joined during the initial period. If suitable purchasers from the Register demonstrably have not been forthcoming within 3 months (minimum) of commencement of marketing the plots, they may be offered for unrestricted market sale to self-build and custom homebuilders including industry sector specialist companies

- Any plots not reserved within a further 3 months (minimum) will be released from this specific policy requirement, following a total of 6 months of marketing.

v To ensure timely delivery of plots, the S106 agreement will contain triggers that link the marketing of self-build and custom housebuilding plots to the occupation of specified percentages of open market housing.

vi Developments required by virtue of this policy to provide self-build and custom housebuilding plots will in addition, and as a priority, be expected to deliver affordable housing across the whole development site in accordance with the Council's adopted policy (see Local Plan 2030 Policy 59S) by way of on-site provision or in exceptional circumstances by payment of commuted sums for off-site delivery, where appropriate. The Council will not normally expect self-build serviced plots to be included as part of the site affordable housing proportion unless this has been agreed in writing within the Heads of Terms of the proposed S106 agreement.

vii Where a development is phased, the siting and provision of self-build and custom housebuilding plots will be set out in a phasing plan

### **Quality of development and space standards**

- 7.14 The quality of buildings and places, and how they integrate with the natural environment, have been shown to affect how people interact with them. Good quality development can create environments which promote wellbeing and happiness, as well as provide functional, well-built places.
- 7.15 The Bedford Borough Local Plan 2030 has a set of design policies requiring that development proposals fully consider design issues. The following documents are also available and give guidance on different aspects of design:
- Sustainable Drainage System SPD 2018
  - Parking Standards for Sustainable Communities SPD 2014
  - Open Space SPD 2013
  - Shopfronts and Advertisements in Conservation Areas SPD 2005
  - Achieving Quality in Residential Layouts SPG 1997
  - Residential Extensions, New Dwellings and Small Infill Developments SPG 2000
  - Houses in Multiple Occupation SPD 2020

### **Current national guidance**

- 7.16 Chapter 12 of the National Planning Policy Framework, “Achieving well-designed places”, supports good design and the creation of high quality places. It encourages plans to set out a clear vision and expectations on design quality in the local area.

### **Nationally described space standards**

- 7.17 The government has set out appropriate nationally described space standards for new developments. These space standards are predicated on the number of bedrooms and the number of people each new dwelling is intended to cater for.
- 7.18 For example, a single bedroom, one-storey dwelling for one person should be a minimum of 37m<sup>2</sup>; and a single bedroom, one-storey dwelling for two people should be a minimum of 50m<sup>2</sup>.
- 7.19 These standards have recently become mandatory for all new dwellings developed under permitted development rights<sup>5</sup>. This is in recognition of the fact that many have fallen below these standards in the past and created inappropriately sized homes. To be consistent with this approach the Council will expect all new dwellings (including newly formed dwellings through conversion) to

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<sup>5</sup> <https://www.legislation.gov.uk/ukxi/2020/1243/made>

conform with nationally described space standards. Further information can be found at [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/524531/160519\\_Nationally\\_Described\\_Space\\_Standard\\_Final\\_Web\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf).

7.20 Separate Regulations apply to sleeping accommodation floor areas in licenced HMOs.<sup>6</sup>

**Policy DQ1 – Residential space standards**

The Council will require all new dwellings to conform to nationally described space standards as a minimum.

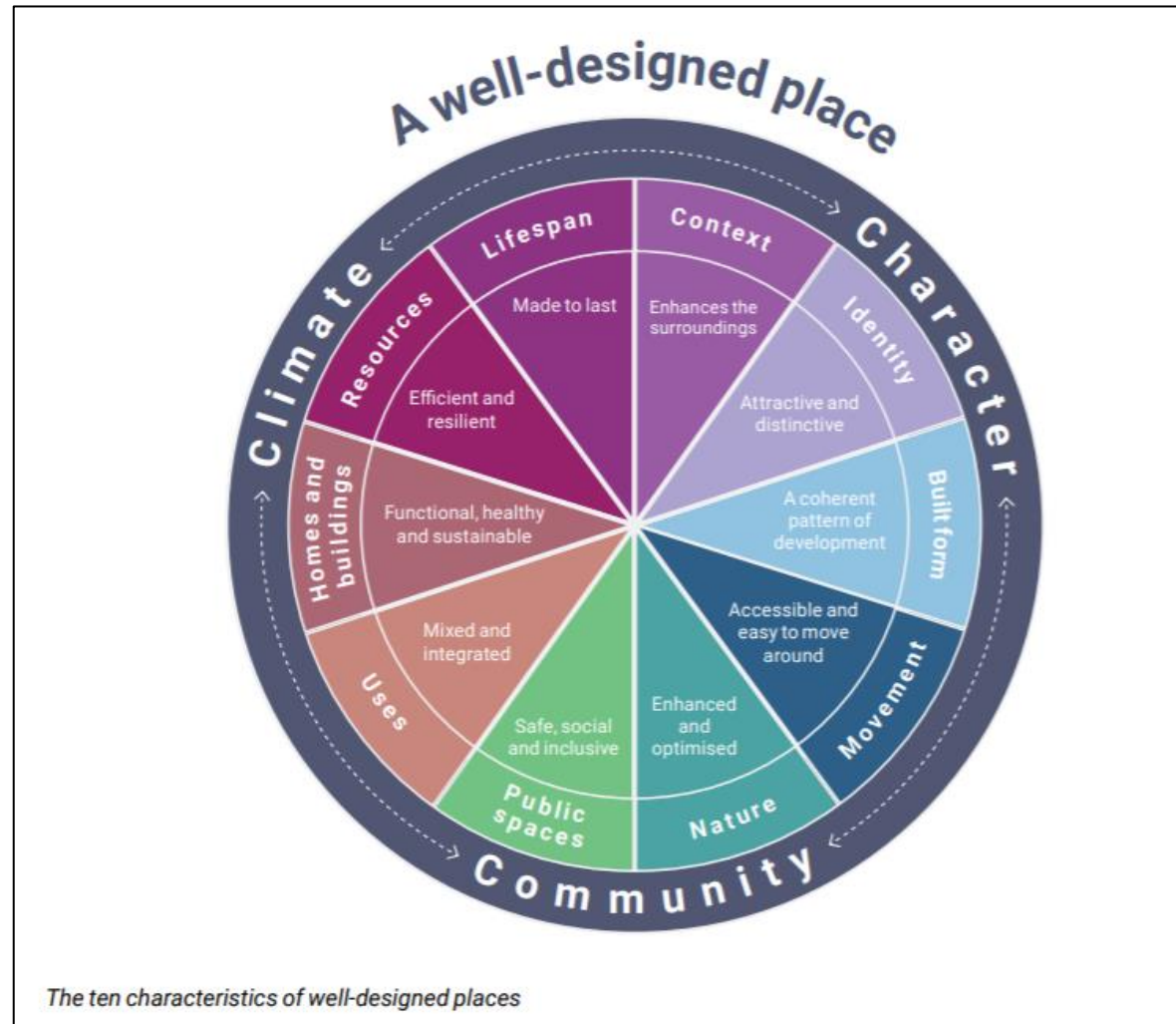
**National design guide**

7.21 The government has recently published a National Design Guide, setting out and explaining ten characteristics of well-designed places. The diagram below is taken from the National Design Guide and sets out these ten characteristics within the overarching headings of climate, character and community:

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<sup>6</sup> <https://www.legislation.gov.uk/uksi/2018/616/made?view=plain>





Source: National Design Guide MHCLG

### National model design code

7.22 The government has recently consulted on a National Model Design Code, the purpose of which is to provide detailed guidance on the production of design codes, guides and policies in Local Plans. Responses are currently being reviewed.

### **Proposed changes to national policy and guidance**

- 7.23 The government white paper “*Planning for the Future*” sets out proposals for changes to the way the planning system will operate.
- 7.24 One of the proposals is to ensure that a revised planning system will enable the creation of beautiful places. The white paper emphasises high quality design of buildings and places that will ultimately create net gain in the quality of the built and natural environments.<sup>7</sup>
- 7.25 The Building Better, Building Beautiful Commission set up by the government published a report in January 2020 making recommendations on how to improve the promotion of good design and beauty. A consultation on amendments to the NPPF to incorporate these recommendations was undertaken in 2020 and, if adopted, these would further emphasise the government’s drive for beautiful places and would support refusal of poor quality schemes.
- 7.26 Together, the National Design Guide, the White Paper, the proposed changes to the NPPF and the National Model Design Code all encourage local authorities to prepare design guides and codes to provide detailed guidance on what would be expected of development in their area.

### **Bedford Borough design guide**

- 7.27 Given the strengthening national context, the vision in section 2 above promotes good design, helping to improve the quality of life and creating safer, vibrant and more sustainable places throughout the borough. Interaction and integration with the natural environment is key when planning new development. In support of the clear national emphasis on design quality, and to supplement the policies in the Local Plan 2030, the Council is currently preparing a design guide.
- 7.28 The intention is that the design guide will include an analysis of local distinctiveness. It will do this by reviewing the built and natural environment of the borough and grouping its geography into different character areas where distinct cohesion and similarity exist. This will provide strategic guidance on design as opposed to a more detailed design code, which would provide a finer grain of detail on what sort of building arrangements and detailed design are required for defined areas. The design guide will then go on to provide general design advice for each of the character areas so that it is clear what development should take its cues from and what it should seek to promote in any given area to respond and fit in with the surrounding environment.

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<sup>7</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/958420/MHCLG-Planning-Consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/958420/MHCLG-Planning-Consultation.pdf)

7.29 There will be a separate opportunity to comment on the scope of the design guide. Further details will be published shortly.

### **Natural environment policies**

7.30 Progress on the Environment Bill that was introduced to parliament in January 2020 has been delayed. The Bill will now be carried over to the next parliamentary session in 2021 due to the impact of Covid-19. Royal Assent may be obtained in autumn 2021, with the Statutory Instruments setting out the environmental targets to be laid before parliament by 31 October 2022. The biodiversity net gain requirements are not likely to take effect until 2023, two years after Assent. For the Local Plan 2040 this means that we will need to monitor progress and may need to include new policies in the plan for submission or during the plan's examination.

7.31 Due to the United Kingdom withdrawing from the European Union, there is now no relevance to previous references to European designated sites or Natura 2000 sites. To assist with the interpretation of current local plan policies, any references to Natura 2000 sites should now be read as referring to [‘the new national site network’](#).

#### What is biodiversity net gain?

7.32 The Department for Environment, Food and Rural Affairs (DEFRA) Biodiversity Metric was first introduced in 2012 and the third version is expected to be published in 2021. The metric is a calculator that is used to measure the biodiversity losses and gains that will result from development. It is designed as a template to which applicants can input their baseline and development information, and it will then produce a figure for net biodiversity gain. At the current time, legislation does not require a mandatory percentage of net gain to be achieved.

#### What is natural capital gain?

7.33 Natural Capital is defined in the government's 25 Year Environment Plan as “the sum of our ecosystems, species, freshwater, land, soils, minerals, our air and our seas. These are all elements of nature that either directly or indirectly bring value to people and the country at large. They do this in many ways but chiefly by providing us with food, clean air and water, wildlife, energy, wood, recreation and protection from hazards”. The 25-Year Environment Plan introduced the concept of embedding an ‘environmental net gain’ principle for development, and the concept of expanding net gain approaches used for biodiversity to include wider natural capital benefits.

#### Environmental net gain

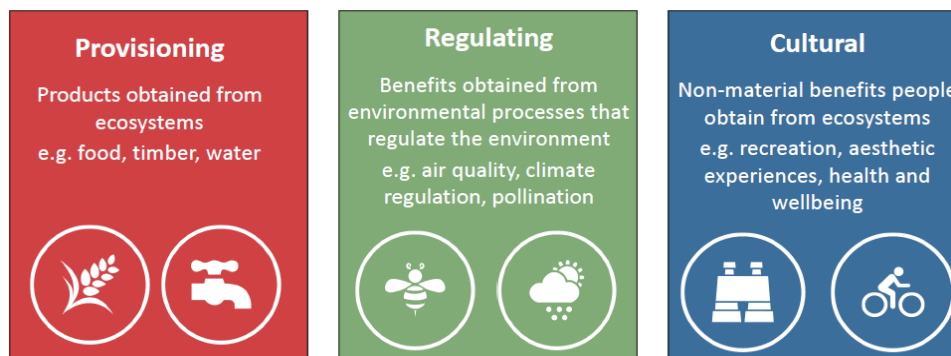
7.34 In line with the National Planning Policy Framework, biodiversity net gain was a concept first introduced in planning policy in Bedford in the Local Plan 2030. However, since the plan was adopted, the environmental agenda has moved on and it is now

suggested we should go further than biodiversity net gain and adopt an environmental net gain approach in planning and development. The Local Plan 2040 provides an opportunity to update our policy. Environmental net gain is defined as:  
**Environmental net gain = biodiversity net gain + natural capital gain**

7.35 HM Treasury’s Green Book further describes ecosystem services as: “Stocks of natural capital provide flows of environmental or ‘ecosystem’ services over time. These services, often in combination with other forms of capital (human, produced and social) produce a wide range of benefits. These include use values that involve interaction with the resource and which can have a market value (minerals, timber, freshwater) or non-market value (such as outdoor recreation, landscape amenity). They also include non-use values, such as the value people place on the existence of particular habitats or species.”

**Natural Capital** is the stock of natural assets, for example, habitats, soils, water and biodiversity

This natural capital produces a wide range of **ecosystem services** that provide **benefits** to people



Source: Bedfordshire Natural Capital Assessment, Natural Capital Solutions

7.36 Environmental net gain builds upon the biodiversity net gain principle, but goes further to include a focus on natural capital assets and the associated benefits such as flood protection, improved water and air quality that can be achieved from developments.

7.37 Bedford Borough Council has been working with DEFRA as part of the Ox-Cam Arc Local Natural Capital Plan Project which looked at how a natural capital approach can be implemented and incorporated into planning policy across the Arc; the documents are available to view on the website – <https://www.oxcamlncp.org/>. The Ecosystem Services Baseline and Comparison report was

completed in March 2021. The information that has been mapped is at a strategic scale across the Arc area. A Natural Capital Accounting Tool has also been produced.

- 7.38 In order to get information at a more local level, The Bedfordshire Local Nature Partnership commissioned natural capital and ecosystem services opportunity mapping for Bedford Borough, Central Bedfordshire and Luton. This work will also inform Local Nature Recovery Strategies which are likely to be a requirement of the Environment Act. Further detail is set out in the evidence base document, Bedford Borough Natural Capital Assessment Report. We have incorporated consideration of the information into our site assessment methodology (see Table 1).
- 7.39 Local Plan 2030 Policy 43 – Enhancing biodiversity explains that development proposals should provide a net increase in biodiversity. In preparation for the emerging principles of net environmental gain, we propose to replace Policy 43 with a policy which explains that development should provide environmental net gain and not just biodiversity net gain.
- 7.40 Other work by the Arc Environment Working Group has led to the production of Arc-wide environment principles which in due course will lead to the development of an Arc Environment Strategy. The draft principles, agreed by Bedford Borough Council, support the concept of net environmental gain and commit partners to working with government to develop a net environment gain metric for use within the Arc. The aim is to put in place technical groups to assess net gain propositions on behalf of local planning authorities and provide planning committees with independent advice.

#### **Policy NE1 –Environmental Net Gain**

Proposals for major development should provide an environmental net gain (in accordance with government policy), which incorporates biodiversity net gain, through the following:

- i Enhancement of the existing features of the site, particularly where these deliver significant levels of ecosystem services; or
- ii The creation of additional habitats on the site; or
- iii. The linking of existing habitats to create links between ecological networks and where possible, with adjoining features.

Planning applications should demonstrate how net biodiversity and net environmental gain will be achieved through the production of a supporting statement that considers the contribution the proposal could make to the borough's natural capital.

In some circumstances there will be a requirement to enhance or create off-site habitats where it is not possible to deliver net gain solely through on-site activities.

Major development is defined as residential sites of 10 or more units; or on a site where the number of units is unknown, a site area of 0.5 hectare or greater. For non-residential uses, sites where the floorspace to be created is 1,000 square metres or greater or the site area is 1 hectare or greater.

## 8.0 Position statements

- 8.1 This section sets out the Council's position in relation to those subjects we asked about in the 2020 consultation but have decided not to update existing or introduce new policies. It also explains where work is currently being carried out that may result in additional policies being included in the plan for submission.

### Climate change

#### Why is it important to address climate change?

- 8.2 It has been established that changes to the global climate are happening at an ever-increasing rate. Increasing average temperatures, changes to weather patterns, rising sea levels and greater risk of flooding are all potential consequences of a 'change-nothing' approach to the way we develop our communities going forward.
- 8.3 The government has recognised the increasing risks to the country climate change poses and, through the Climate Change Act 2008 and the subsequent Amendment Order (Climate Change Act 2008 (2050 Target Amendment) Order 2019) has committed the UK to reaching net zero greenhouse gas emissions by 2050.
- 8.4 The Paris Agreement in December 2015 resulted in international agreement to keep global temperature increases "well below" 2.0C and "endeavour to limit" the rise to 1.5C.

#### National Policy

- 8.5 The Planning and Compulsory Purchase Act 2004 requires local planning authorities to include in their local plans policies to ensure development, and use of land contribute to the mitigation of and adaptation to climate change.
- 8.6 To achieve sustainable development, the National Planning Policy Framework states as part of its environmental objective of sustainable development that the planning system should "contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

- 8.7 It requires plans to “take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures”.
- 8.8 The government’s online national planning policy guidance sets out examples of how local plans might address climate change.

#### Bedford Borough Council Approach

- 8.9 Bedford Borough Council declared a climate emergency in March 2019 and pledged to make its own operations carbon neutral by 2030. It has developed a Carbon Reduction Delivery Strategy setting out how it will achieve this aim. As part of this strategy the Council has pledged to incorporate the carbon neutral ambition into all Council strategies, including the Local Plan 2040.
- 8.10 Future development will need to incorporate different features to not only reduce their carbon emissions but also to be resilient to the climate change already happening. This will include more efficient building, flood resilience, the incorporation of renewable energy sources and to allow the means for communities to shift their methods of travel. The role of the local plan in affecting climate change is one of facilitating the right environment for measures to be included in existing and future development. It will take the combined efforts of communities, residents, businesses and the development industry in the borough to embrace those measures.
- 8.11 The Mayor has also set up a climate change fund, which offers grants to community groups to help with the cost of carbon reduction projects.
- 8.12 The Local Plan 2030 incorporated both methods of adaptation and mitigation in response to the climate change emergency. Adaptation seeks to reduce the risk results from a changing climate, for example through flood defences whilst mitigation seeks to reduce the causes of climate change, such as reducing greenhouse gas emissions from new development. It includes a chapter on resources and climate change which contains policies requiring the effective use and re-use of land, consideration of water quality and supply and energy efficiency.

#### What can we do in the Local Plan 2040?

- 8.13 A large part of combating climate change is in the pattern of development that will occur in the borough going forward and this will be directly influenced by the spatial strategy that the Council adopts. By choosing a spatial strategy which will encourage fewer greenhouse gas emissions, the Council can work towards adapting development to reduce climate change risk and mitigate against the causes of climate change, for example through the promotion of walkable neighbourhoods.



8.14 We commissioned consultants to prepare a new Strategic Flood Risk Assessment (SFRA). The SFRA is an essential piece of the evidence base which models the flood zones for the borough. Since the Local Plan 2030 was adopted, new guidance has been released by the government on how to take into account climate change allowances in modelling the flood zones. The climate change allowances are a percentage increase on the current flood zone 3a. This allows the Council to see what the extent of flooding might look like in different scenarios. The percentage increase applied will depend on the situations, for instance the type of development (residential, commercial, etc.) and the likely lifetime of the development (usually forecast as 60 years for commercial development and 100 years for residential). The SFRA will help with the selection of development sites.

#### Future homes standards

- 8.15 Between October 2019 and February 2020 the government consulted on proposed changes to building regulations in relation to energy efficiency.
- 8.16 It published a summary of the comments received and its response to those comments on 20 January 2021. The conclusions to the consultation were:
- A change in building regulations requiring new buildings to produce 31% less carbon dioxide will come into effect in June 2022
  - Technical consultation on the specification for the Future Homes Standard is planned for spring 2023
  - New building regulations requiring even greater reduction in carbon dioxide emissions from new buildings to come into effect in 2025.
- 8.17 Policy 54 of the Local Plan 2030 currently requires new dwellings to have an energy efficiency standards equivalent to Level 4 of the Code for Sustainable Homes, which amounts to a 19% improvement on current building regulations. By the time this plan reaches the point of adoption the national standards will have overtaken this. Policy 54 will therefore remain in place until new building regulations are adopted that exceed its requirements.
- 8.18 Given the existing development plan policies, apart from making the relevant amendments to Policy 54 Energy Efficiency, the Council is not aware of the need for additional climate change policies.

## Gypsies, Travellers and Travelling Show People

- 8.19 The Council has commissioned an updated Gypsy & Traveller Accommodation Assessment (GTAA). The purpose of this Assessment is to provide a robust analysis of the current and future need for Gypsy, Traveller and Travelling Show People’s accommodation in Bedford Borough in the years up to 2040. Full details are set out in the evidence base document GTAA.
- 8.20 In relation to Gypsies, Travellers and Travelling Show People, national policy draws a distinction between those who travel and those who do not. The planning system must make provision for those who travel; this is often referred to as the ‘planning definition’. The GTAA only formally identifies the needs of Gypsies, Travellers and Travelling Show People who meet the planning definition.
- 8.21 The additional needs of those members of the Gypsy and Traveller community who do not meet the planning definition are set out in the Local Housing Needs Assessment. However, the way that these needs are accommodated are in practice the same. Recent case law says that it is inappropriate to require any of the travelling community to live in bricks and mortar dwellings, and instead their needs should be met through the provision of plots and pitches.
- 8.22 In the plan period there is an identified need for an additional 46 Gypsy and Traveller pitches and 13 Travelling Show People plots, as follows:

Plan years	0-5	6-10	11-15	16-20	Total
	2020-25	2026-2030	2031-2035	2036-2040	
Gypsies & Travellers (meeting definition)	0	2	0	1	3
Gypsies & Travellers (not meeting definition)	22	6	7	8	43
<b>Total pitches</b>	<b>22</b>	<b>8</b>	<b>7</b>	<b>9</b>	<b>46</b>
Travelling Show People (all meet the definition)	8	3	2	0	13

- 8.23 The Council will submit planning applications to meet the required need for additional pitches and plots. There is therefore no requirement to allocate sites in the local plan.

## **Crematorium and burial capacity**

- 8.24 The Council is aware that there may be a future requirement for additional crematoria and burial capacity within the borough and has commissioned a study to determine more precisely the land and facilities required. Once the study is complete the Council will decide how any additional capacity can be delivered. This may be by allocating a site, by preparing a development management policy to help guide future planning applications or by submitting a planning application.
- 8.25 If a new allocations policy or development management policy is required, it will be included in the plan for submission.

## **Healthy weight environments – hot food takeaways**

- 8.26 The development plan already contains up-to-date and relevant policies in relation to Healthy Communities (Policy 2S) and for the protection, enhancement and provision of green infrastructure, and walking and cycling routes.
- 8.27 In 2020 Public Health England published guidance '[Healthy weight environments: using the planning system](#)' for local authority public health and planning teams which recommended actions relating to updating and referencing the changes to the Use Classes Order, monitoring, and ensuring decisions are made based on local physical and mental health and wellbeing evidence. Further detail is set out in the evidence base document Healthy Weight Environments Topic Paper.
- 8.28 As referenced in the 2020 Issues and Options paper, due to concerns about excess weight and obesity, particularly in young people, the Council was reviewing whether there was sufficient evidence to justify a restriction on the opening of hot food takeaways in proximity to schools and other locations where young people congregate.
- 8.29 However, the government's recent changes to the Use Classes Order mean that it is no longer possible for local planning authorities to control changes from shops to restaurants and cafés. Such premises are already allowed to sell some hot food for consumption off their premises.
- 8.30 It is only where a change of use is proposed to create a hot food takeaway, which primarily serves the takeaway market, that planning permission is now required.
- 8.31 In deciding whether such a change of use should be permitted, a number of factors and policies would be considered. The draft town centre and retail policies in section 6.0 above explain that in Bedford town centre, Kempston district centre and in local

centres hot food takeaways are amongst the uses that are likely to be acceptable. The draft policies also state that this range of uses will be supported provided that they avoid a concentration of similar uses where the cumulative impact will be detrimental to environmental quality, amenity, parking or increase the risk of anti-social behaviour. Draft Policy TC9 in particular specifically covers these potential impacts of town centre uses. Concentration, environmental and disturbance issues are therefore sufficiently covered.

- 8.32 Public Health colleagues both nationally and locally continue to be concerned about the potential impacts of hot food takeaways on the health of residents. Unfortunately the Covid-19 pandemic has meant that resources within public health have been prioritised elsewhere. We will continue to work with colleagues over the coming months to see whether there is a sufficient evidence to justify any additional policies.

### **Hotel and visitor accommodation**

- 8.33 We have commissioned an update to the hotel and visitor accommodation evidence base to consider the following questions:
- Is demand for visitor accommodation likely to continue to grow as anticipated in the 2014 study, particularly given the impact of Covid-19?
  - Is there still potential for some of the more innovative rural accommodation offers to be developed in the borough?
  - Is Local Plan 2030 Policy 76 adequate to plan effectively for the hotel and visitor accommodation proposals that are likely to come forward during the Plan period?
- 8.34 The outputs from this work will feed into the plan for submission.

### **Infrastructure delivery plan**

- 8.35 New and upgraded infrastructure of all kinds will be needed to support the growth to be allocated in the local plan. Once the development strategy has chosen, infrastructure requirements can be identified and set out in an Infrastructure Delivery Plan which will be published alongside the Local Plan 2040 plan for submission.

### **Open space standards**

- 8.36 Bedford Borough Council has commissioned a Playing Pitch Strategy to assess the existing provision of, and future demand for, outdoor sports, and to prepare a strategy for how those needs will be met. This work is yet to be finalised but, when it is, it may

require new standards for the provision of open space within development. If new policies are needed, they will be included in the plan for submission.

- 8.37 In the meantime Sport England have requested that attention is drawn to the Active Design guidance which is available on their website <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>. The document outlines 10 principles of active design to inform the layout of new development and includes such things as having multifunctional open space, providing the infrastructure to take part in sport and physical activity, walkable communities and connected cycling and walking routes.

# Appendix 1

The following table lists the existing development plan policies that would be replaced once Local Plan 2040 has been examined and adopted.

<b>Current policy number</b>	<b>Adopted policy to be replaced</b>	<b>New policy (Local Plan 2040)</b>
1S	Reviewing the Local Plan 2030	Delete
3S	Spatial strategy	Will be replaced once spatial strategy agreed
4S	Amount and distribution of housing development	Will be replaced once amount and distribution of housing agreed
15	Town centre uses	TC3 – Bedford town centre – changes of use
16	Bedford High Street	TC3 – Bedford town centre – changes of use
43	Enhancing biodiversity	NE1 – Environmental net gain
69S	Amount and distribution of employment development	E1S - Amount and distribution of employment development
77S	Hierarchy of town centres	TC1S - Hierarchy of town centres
78	Out of centre development	TC2 – Out of centre development
79	Policy S4 – Kempston district centre – new retail development	TC4 – Kempston district centre – new commercial, business and service use development
80	Kempston district centre – changes of use	TC5 - Kempston district centre – changes of use
81	New shops in local centres	TC6 – New commercial, business and service uses in local centres
82	Local centres (including key service centres) – changes of use	TC7 – Local centres (including key service centres) – changes of use

83	Neighbourhood centres and individual shops – changes of use	TC8 – Essential local shops and public houses – changes of use
84	All shop units	TC8 – Essential local shops and public houses – changes of use
85	Impact of town centre uses	TC9 – Impact of town centre uses