Purpose of report
This report seeks the Planning Policy Committee’s endorsement of the officer response to the Bedford Borough Local Plan Review, “Issues and Options” consultation submitted on 4th September 2020.

Attachment
Appendix 1: “Have Your Say” – summary Local Plan Review document (Bedford Borough Council)
Appendix 2: Detailed summary of issues regarding the Bedford Local Plan Issues and Options consultation
Appendix 3: Consultation Response Form (officer response as submitted on 3rd September 2020)
Appendix 4: “Brown” and “Red” spatial options

1.0 Background

1.1 The Bedford Borough Local Plan 2030 was adopted on 15th January 2020. Given the short (10 years) timeframe for this Plan, it has been necessary for Bedford Borough Council (BBC) to begin a rapid review of the Local Plan.

1.2 BBC formally launched the Local Plan Review on 14th July 2020, with an Issues and Options consultation, with the closing date for responses of 4th September 2020. Full details of the Issues and Options consultation are set out in the Borough Council’s Planning Policy web pages.

1.3 Formal Member endorsement of this council’s officer response is sought, as the Issues and Options consultation raises possible matters of strategic significance regarding the implications of potential spatial development options for the southern part of East Northamptonshire District (south of the A14).

1.4 This report covers:

- The scope of the Bedford Borough Local Plan Review – themes and topics to be considered; and
- The council’s officer response to the 13 Issues and Options consultation questions.

2.0 Scope of the Bedford Borough Local Plan Review

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

2.2 Despite being adopted this year, the current Bedford Borough Local Plan has less than 10 years to run (to 2030). BBC needs to a revised Local Plan that responds to longer term growth requirements, in particular in relation to the Oxford to Cambridge Arc. The Local Plan Inspector accepted that because of the uncertainty about Arc-related development and infrastructure needs post 2030, the Local Plan 2030 should not seek to address this, but that the next plan should do so quickly.

2.3 The Issues and Options consultation is the first opportunity to help shape BBC’s new Local Plan. The purpose of this consultation is to gather comments about the range of subjects to be covered in the plan and where in the BBC area new growth should be located; i.e. the future spatial development strategy (Appendix 1). BBC prepared a consultation paper² to help consultees consider and comment on these issues. Further details about the range of issues to be covered by the new Local Plan are set out at Appendix 2 to this report.

2.4 Through the Local Plan Review, the BBC proposes to:

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

3.0 ENC officer response to BBC’s 13 Issues and Options consultation questions

3.1 The consultation is structured through 13 questions, and the council’s officer response is set out at Appendix 3.

3.2 The most substantive strategic issues are raised at question 4 and 5 regarding the potential locations for housing and employment growth. This is underpinned by six potential spatial growth strategies (Appendix 1). Associated with these six potential spatial strategies, the following broad locations for growth are identified (as identified at Appendix 1 of this report):

- “Brown” option (Urban based growth) – further regeneration within the Bedford / Kempston urban area, particularly of any available brownfield sites,

² https://bedford.oc2.uk/document/1/128#d130
expansion of the Bedford / Kempston urban area, and expansion within the borough boundary, of neighbouring urban areas, such as Rushden and St. Neots;

- “Yellow”/ “Pink” options (Yellow – A421 based growth/ Pink – Rail growth) – development along the A421 road/ rail corridor;
- “Orange” option (East/ West rail northern station growth) – development around a new East West Rail northern station;
- “Red” option (New settlement based growth) – new settlements in locations with good accessibility;
- “Grey” option (Dispersed growth) – more dispersed development throughout the borough including the expansion of villages.

3.3 Of the potential growth options, the Brown (Urban based growth) and Red (New settlement based growth) are identified as having potentially significant implications for East Northamptonshire. The detailed response regarding the Brown and Red options is set out at Appendix 3, Q4, while detailed comments regarding infrastructure priorities are set out at Appendix 3, Q5.

3.4 East Northamptonshire Council has been closely engaged with BBC, the Borough Council of Wellingborough (through the North Northamptonshire joint working arrangements) and Northamptonshire County Council (Highways) through regular Duty to Co-operate meetings over recent years. These meetings will continue as the Local Plan progresses. There are potentially significant issues that could arise if significant new development is proposed for the A6 / Midland Mainline corridor; notably the possible Colworth Garden Village or strategic development proposals to the South of Rushden within Bedford Borough. These areas are shown on a plan at Appendix 4.

3.5 BBC is considering an extensive range of potential spatial development strategies (at least six possible approaches). East Northamptonshire Council could potentially support strategic development proposals where these deliver tangible infrastructure projects, such as a new Midland Mainline rail station (be it at Colworth / Sharnbrook or Wymington), which would support sustainable transport initiatives within the wider area.

3.6 Of particular significance, BBC has undertaken preliminary investigations into the potential for a new station on the Wymington Loop, which is close to the ENC administrative boundary. This work is still in the exploratory stages and they will be keeping neighbouring authorities informed as work progresses.

4.0 Conclusion

4.1 This report summarises the headline matters for the emerging BBC Local Plan Review. It highlights issues arising from the Issues and Options consultation that have potential strategic implications for East / North Northamptonshire and sets out responses to these issues.

4.2 A draft officer response has been submitted to Bedford Borough Council, in order to meet the 4th September 2020 consultation deadline. This report is being presented to the Planning Policy Committee to allow Members to agree and finalise the Council’s response to BBC’s Local Plan Review Issues and Options consultation.

5.0 Equality and Diversity Implications
5.1 There are no equality and diversity implications arising from this report.

6.0 Privacy Impact Implications
6.1 There are no privacy impact implications arising from this report.

7.0 Health Impact Assessments
7.1 There are no health impact issues arising from this report. It is noted in the consultation paper, that Bedford Borough Council acknowledges the need for the impact of developments on health to be assessed by way of health impact assessments (Q13).

8.0 Legal Implications
8.1 The 2011 Localism Act (section 110) introduced a statutory Duty to co-operate in relation to planning of sustainable development as an amendment to the 2004 Planning and Compulsory Purchase Act. This introduced a requirement for local planning authorities to actively engage with neighbouring authorities in plan-making.

9.0 Risk Management
9.1 The emerging Bedford Borough Local Plan Review Issues and Options consultation raises potential strategic matters of significance, particularly with regards to the implications for the south of the District, particularly Rushden.

9.2 In order to ensure compliance with the statutory Duty to Co-operate, and inform or influence the Bedford Borough Local Plan Review it is necessary for the council to formally respond. This process of engagement is a two way process, with BBC also having a regular opportunity to comment on ENC’s emerging Local Plan Part 2.

9.3 Given that significant issues are identified it is important that this council is providing constructive engagement and input into the Bedford Borough Local Plan process. Otherwise there is a risk that strategic matters arising from BBC’s Local Plan process might not be adequately addressed.

10.0 Resource and Financial Implications
10.1 There are no resource and financial implications arising from this report.

11.0 Constitutional Implications
11.1 There are no constitutional implications arising from this report.

12.0 Implications for our Customers
12.1 There are no customer service implications arising from this report.

13.0 Corporate Outcomes
13.1 The relevant Corporate Outcomes are:

- Good Quality of Life – sustainable development, strong communities and high quality built environment
- Effective Partnership Working – effective joint working with neighbouring local planning authorities
- Effective Management – delivering development and associated infrastructure in a coordinated and sustainable manner.

14.0 Recommendation

14.1 The Committee is recommended to:

1. Endorse the officer draft response to the Bedford Borough Local Plan Issues and Options consultation, at Appendix 3 to this report.

2. Identify any amendments or additions to the Council’s draft response to the Bedford Borough Local Plan Issues and Options consultation, at Appendix 3, to allow for the Council’s consultation response to be formally confirmed.

(Reason – To comply with the statutory Duty to Co-operate and identify matters of strategic importance arising from the emerging Bedford Borough Local Plan Review)

<table>
<thead>
<tr>
<th>Legal</th>
<th>Power: Planning and Compulsory Purchase Act 2004 Localism Act 2011</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other considerations:</td>
<td></td>
</tr>
</tbody>
</table>

| Background Papers: | North Northamptonshire Joint Core Strategy 2011-2031 (adopted 14th July 2016)  
|                    | Bedford Borough Local Plan Issues and Options paper (July 2020):  
|                    | https://bedford.oc2.uk/document/1 |

| Person Originating Report: | Michael Burton, Principal Planning Policy Officer  
|                           | ☑ 01832 742221 mburton@east-northamptonshire.gov.uk |

| Date: 10 September 2020 |

| CFO | MO (deputy) 9.9.20 | CX 9.9.20 |
Local Plan Review
Have Your Say on the Future of Your Borough

Local Plans set out where growth and development will take place - everything from homes and jobs to schools and infrastructure.

Bedford Borough Council already has a Local Plan in place up to 2030. With changes to national planning policy and proposals around the Oxford to Cambridge Arc – which Bedford Borough is at the heart of - we now need to look further ahead, so we are carrying out a Local Plan Review and want to hear your thoughts.

Review of the Bedford Borough Local Plan
The next local plan will mainly focus on developing a strategy to guide housing and employment growth and identify the infrastructure needed to support it.

It will also look at policies around tackling climate change, protecting the natural environment, quality of development, the provision of open spaces, self and custom build homes, the location of food outlets to ensure a healthy Borough, and the town centre.

Further details are in our consultation paper and this leaflet sums up the key points.
How much growth should there be?

Councils are required by the Government to plan for a certain level of housing growth in their local plans and reach a minimum number of new home completions each year. We may need to make new allocations to provide between 5,000 and 15,000 additional new dwellings over a plan period to 2040, depending on the Government’s formula. If the timescale is longer, then more housing sites must be allocated to meet the Government’s minimum target. Additionally, as plans start to look further into the future, the assumptions must make become more unpredictable as local and national policies and plans change. Development will need to be a balance of homes, jobs and other supporting locations.

Where should development be located?

Deciding the best locations for growth will be an important part of the next local plan. The diagrams below show different locations where growth might take place along with some of the pros and cons. They do not represent strategy options for the local plan; it may be that the local plan strategy will need to combine elements from more than one of these locations to achieve the scale of growth required. Can you suggest other locations?

**Brown – Urban based growth**

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

**Pros – advantages**
- Supports services, facilities and businesses in urban areas, particularly Bedford town centre.
- Urban locations; have the greatest potential for residents to make sustainable travel choices (walking, cycling and public transport).
- Increasing development density improves public transport viability.
- Makes good use of brownfield and under-used land. Higher density development more appropriate in urban locations.
- Reduces need for growth in rural areas.
- More employment uses (e.g. business services) within centre will improve viability and create direct benefits of other associated business uses such as retail and leisure.

**Cons – disadvantages**
- Opportunities for growth within urban areas are limited, so most growth would be on the edge of urban areas and closer to existing villages.
- Very high density schemes could be out of character and affect local distinctiveness.
- Growth may overstretch existing services, facilities and infrastructure in towns.
- Expansion of Rushden and St. Neots (within Bedford Borough) may not be supported by those towns.
- Rural locations would miss the benefits associated with growth.
- Restricted sites sizes can restrict scheme options and opportunities to mitigate risk for investors.
- More development at high density in the urban area may contribute to poor or quality issues.

**Yellow – A421 based growth**

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

**Pros – advantages**
- Takes advantage of existing and proposed road infrastructure improvements.
- Close to existing employment areas with good connections.
- Connects with regeneration of the Marston Vale and the creation of the Community Forest.
- Reduces need for growth in other rural areas.
- Opportunity to extend the established settlement at Wixams to access the new rail station.
- Provides the opportunity to phase growth, linked to upgraded infrastructure.
- Could incorporate a western expansion of St. Neots or a new settlement at Wyboston.
- Capitalise on proximity and reduced travel time to high value Cambridge market.

**Cons – disadvantages**
- Opportunities for growth within urban areas are limited, so most growth would be on the edge of urban areas and closer to existing villages.
- Very high density schemes could be out of character and affect local distinctiveness.
- Growth may overstretch existing services, facilities and infrastructure in towns.
- Expansion of Rushden and St. Neots (within Bedford Borough) may not be supported by those towns.
- Rural locations would miss the benefits associated with growth.
- Restricted sites sizes can restrict scheme options and opportunities to mitigate risk for investors.
- More development at high density in the urban area may contribute to poor or quality issues.

**Pink – Rail growth**

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

**Pros – advantages**
- Combines some of the benefits of urban and A421 growth location options.
- Opportunity to extend the established settlement at Wixams with access to the new Wixams rail station (Thameslink) and a link to an enhanced station on the East-West rail line.
- Reduces need for growth on villages.
- Opportunities for high-tech employment development in association with East-West rail services in balanced communities with the option to live and work locally.
- Increases employment opportunities in the urban area and sustainable methods of transport for those residents in most deprived areas.

**Cons – disadvantages**
- Would also have the disadvantages of growth focused on the urban fringe, including visual impact of strategic scale growth on local landscapes.
- Exact route of the railway not yet known.
- Development north of Bedford is unlikely to be possible without a northern station.
- Other locations would miss the benefits associated with growth.

**Orange – East-West rail northern station**

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

**Pros – advantages**
- A new parkway rail station north of Bedford could reduce traffic congestion in the town and provide parking. It could also serve any new settlements north of Bedford.
- Reduces need for growth on villages.
- Opportunities for high-tech employment development in association with a new East-West rail station providing option to live and work locally.
- Provides opportunities for sustainable and active transport links, both between new settlements and to the urban area.

**Cons – disadvantages**
- May require growth in communities that have no or very few facilities. This may encourage more car use as residents have to travel further, making walking and cycling less attractive.
- Would still require significant growth in and around Bedford if it were to take its proportionate share.
- Lack of a focused critical mass of development makes providing new strategic infrastructure more difficult.
- Unlikely to facilitate employment growth due to dispersed nature.

**Grey – Dispersed growth**

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

**Pros – advantages**
- Every community contributes proportionately to achieving the growth target.
- The impact of growth on infrastructure is spread between the borough rather than focused on a smaller number of locations.
- Would open up new markets, assist in providing small housing sites and help early delivery of new homes.
- A greater number of communities see the benefits of growth for example in supporting local services and facilities.

**Cons – disadvantages**
- Potential for sustainable growth using garden village principles, creating self contained new communities with good infrastructure provision.
- Reduced amount of development that must be accommodated in other locations.
- Detached ‘villages’ set among open green space in nature and countryside.
- Issues with new settlement proposals previously put forward would need to be resolved before they could be allocated.
- Significant new infrastructure may be required to accommodate growth.

**Red – New settlement based growth**

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

**Pros – advantages**
- Potentially sustainable development using garden village principles, creating self contained new communities with good infrastructure provision.
- Reduced amount of development that must be accommodated in other locations.
- Detached ‘villages’ set among open green space in nature and countryside.
- Issues with new settlement proposals previously put forward would need to be resolved before they could be allocated.
- Significant new infrastructure may be required to accommodate growth.

**Call for sites – Are there any sites we should specifically consider?**

The new local plan will identify land for development by allocating sites. If you know of a site that may have development potential, or if you are a landowner, business or developer and have a site you would like to bring to our attention, please complete a site submission form. All sites proposed will be considered for inclusion in the plan. We would prefer you to do this online using our consultation system. Alternatively forms can be downloaded, completed and then emailed, or submitted by post if necessary. (See next page Have your say). Please submit your sites to us by 5pm on Friday 14th August 2020.

Page 100 of 136
Have your say

We would prefer to receive your comments using our online consultation system:

🌐 www.bedford.gov.uk/localplanreview

However you can download a response form to email to us:

✉️ planningforthefuture@bedford.gov.uk

Or Post it (with a stamp) to:

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

You can request a paper copy of the consultation paper and/or the response form by calling:

📞 01234 718070

This is a summary leaflet and covers key issues only. The full consultation paper can be seen at www.bedford.gov.uk/localplanreview and can be read by appointment in the Customer Service Centre, Horne Lane, Bedford MK40 1RA, 01234 267422. It will be placed in local libraries if they re-open during the consultation period.

We have recorded a presentation which explains the key aspects of the information set out in the consultation paper. The link can be found at www.bedford.gov.uk/localplanreview

You may have questions or require more information before you feel able to comment. Ordinarily we would hold drop in sessions around the borough, however due to current COVID19 restrictions we are unable to do this.

We have created an FAQs page at www.bedford.gov.uk/localplanreview which covers common queries and information which may help you. If not, you can email your question to planningpolicy@bedford.gov.uk, or call us on 01234 718300 where you can leave an answer phone message and we will return your call.

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

⚠️ Please note the closing date for submitting potential development sites is 14th August 2020 – see call for sites above.
Appendix 2: Bedford Borough Council Local Plan Review Issues

Paper summary

September 2020

Introduction

A.1 Bedford Borough Council recently adopted its Local Plan 2030, but is required to undertake a rapid review of this, as the newly adopted Plan has just a decade to run. The Borough Council is of the view that the majority of the development management policies in the Local Plan 2030, as these have been recently adopted, do not need to be updated. However a new policy in the Local Plan 2030 commits the Council to a challenging review timetable, whereby an updated or replacement plan should be submitted for examination by January 2023.

Scope of the plan

A.2 The Plan review will focus mainly on growth and infrastructure (housing, employment and supporting infrastructure). The Issues and Options paper proposes for the Plan to:

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

A.3 The adopted development plan for Bedford Borough is made up of the following documents:

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

- **Neighbourhood Plans (made).** 2 “made” Neighbourhood Plans (Carlton & Chellington and Oakley), with out of 31 designated Neighbourhood Areas.

**Context**

A.4 The Local Plan 2030 was adopted in January 2020 following a public independent examination. Whist national policy now requires that local plans are reviewed and if necessary, updated every five years, in Bedford’s case the examination resulted in the inclusion of a new policy in the Local Plan 2030. This committed the Council to a more challenging review timetable, requiring an updated or replacement plan to be submitted for examination by January 2023.

A.5 The main reason given for this (by the examining Inspectors), was that there is a need for the Council to have a plan that responds appropriately to longer term growth requirements, and in particular in relation to uncertainty about the Oxford to Cambridge Arc development and infrastructure needs post 2030.

A.6 A second reason related to the speed with which new development would be built in coming years and the progress being made by local communities with their own neighbourhood plans, which (in part) the Local Plan 2030 relies upon to identify housing sites.

A.7 For these reasons, the Plan Inspectors concluded that an early review of the Local Plan 2030 would offer the opportunity for the Council to intervene in order to maintain house building rates, if necessary.

**The Oxford to Cambridge Arc**

A.8 The Government has a long-term ambition to see economic growth in the Oxford to Cambridge Arc which includes Buckinghamshire and Oxfordshire authorities in the south and west to Cambridgeshire authorities in the east and north. Bedford borough lies in the centre of the Arc. While Bedford Borough is positioned at the centre of the Arc, it is important to note that this also covers Northamptonshire.

A.9 In 2019 the Ministry of Housing, Communities & Local Government explained its ambition that the local authorities across the Arc and other organisations (including the Local Enterprise Partnerships), should work together to consider the area’s long term potential and how that might be achieved. The
Government has designated the Arc as a key economic priority and expressed its ambition for up to one million new homes to be built across the area by 2050. At the heart of the Arc, the Government has committed to completing a new East West Rail route joining Oxford to Cambridge as well as a new expressway, whilst delivering environmental improvements.

A.10 The Local Plan will therefore focus on how to meet Bedford Borough’s own growth requirements, based on the Government’s published standard method for calculating housing need. This alone will be a significant challenge because it represents a 35% increase in the annual level of housing growth contained in the Local Plan 2030.

Neighbourhood Plans

A.11 Of 31 designated Neighbourhood Areas, 20 Neighbourhood Plans are currently being actively prepared. Critically, those that are identifying sites to meet growth targets in the Local Plan 2030 are making good progress.

A.12 Two have so far been ‘made’, following local referenda, meaning that they are now part of the development plan alongside the Local Plan 2030 and other retained planning policies. In due course parish councils with Neighbourhood Plans in place will decide if they want to review those plans to allocate development beyond 2030, either in accordance with the Local Plan Review or because there is a local need to do so. If parish councils do not want to update Neighbourhood Plans then they can work with the Borough Council to include any additional sites that are needed in the local plan review.

What is this consultation about?

A.13 The Issues and Options consultation paper seeks comments on the scope of the Local Plan Review; the issues that its policies should cover and the options available to address them. The following potential growth in future development is under review:

- further regeneration within the Bedford / Kempston urban area, particularly of any available brownfield sites;
- expansion of the Bedford / Kempston urban area;
- expansion within the borough boundary, of neighbouring urban areas, such as Rushden and St. Neots;
- development along the A421 corridor;
- development around an East West Rail northern station;
- new settlements in locations with good accessibility;
- more dispersed development throughout the borough including the expansion of villages
A.14 Of these potential growth areas, the potential expansion “within the borough boundary, of neighbouring urban areas such as Rushden...” (South of Wymington) is of notable significance to ENC.

A.15 Although, it is stated that whilst urban locations have the greatest potential for residents to make sustainable travel choices (walking, cycling and public transport) and reduces the need for growth in rural areas, the expansion of Rushden (albeit within Bedford borough), may not be supported by the town. The review also acknowledges that more development, at a high density in the urban area, may contribute to poor air quality issues and that growth may overstretch existing services, facilities and infrastructure in Rushden.

**Housing**

A.16 In addition to setting the quantum of housing to be provided in future years the plan review should respond to a number of additional policy requirements which have emerged since the drafting of the Local Plan 2030. National planning policy now requires that 10% of housing delivered in the plan period be located on sites of one hectare or less. Whilst many of these sites will be provided through windfall development the plan will need to have regard to the need to allocate a range of sizes of housing sites including smaller sites.

A.17 During the course of the preparation of the Local Plan 2030 the Borough Council considered whether new settlements might form part of the development strategy but ultimately found that none of the proposals was ready for allocation. New settlements remain an option for this plan but only where there is a clear case that they would be developable in the plan period.

A.18 The review states that provision of affordable housing remains an important part of any development, as does the need to provide for housing to meet the needs of particular groups such as families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes. The Council’s Local Plan 2030 already takes account of the change to the Government definition of affordable housing in 2019 but it does not contain a policy for self-build housing, as at the time of the Local Plan examination the Inspectors did not consider that there was sufficient local evidence to justify one.

**Employment**

A.19 The Economic Vision for the Oxford – Cambridge Arc April 2019, sets out that the Arc will be:
• A place where specialist commercial knowledge and skills collide with world-leading research and development assets to shape existing and new industries.
• A testbed for innovation that will shape the twenty-first century.
• A business growth-enabled environment where our ideas and inventions are rapidly commercialised and spun-out, whilst our most exciting entrepreneurs are supported to scale-up new services, products and markets.

A.20 The review states that Bedford borough has “a skilled workforce, an above average rate of employment and a high proportion of ‘top level’ occupations”. It is considered that the economy of Bedford is diverse and vibrant. However, it is noted that many of the most skilled jobs are located outside of the borough - as Bedford benefits from good strategic connections to nearby economic centres. It is assumed that the planned East-West Rail route and strategic road improvements will further improve those connections, providing good links to Cambridge in particular. The wider area’s existing strengths and potential mean that there is an opportunity to improve Bedford’s economic strength by “reversing that commuter flow and attracting investment in new high value, knowledge intensive industries to the borough”.

A.21 The recently adopted Local Plan does not allocate new sites for employment because there was already sufficient land available that had not been occupied. However, that situation will almost certainly change over this plan period. Attracting businesses back to the urban area and town centre could increase the viability of other uses such as retail and leisure.

Town centre

A.22 The review acknowledges that there has been much discussion in recent years about the future of town centres. Some are predicting the end of traditional High Street shopping because of the increasing preference of people to shop on-line. Whilst town centres across the country have seen an increase in the number of vacant shop units, for many people the town centre of Bedford is an important place to visit because of its accessibility and the concentration of leisure and entertainment facilities. Independent niche retailers are attracted to Bedford town’s historic core while some national chains have left to concentrate on larger out-of-town or regional shopping centres.

A.23 The Borough Council is already investing to improve the appearance of Bedford town centre and make it a place where people want to linger and is encouraging more community uses and housing. A comprehensive approach
to the future of Bedford’s town centres will be required. Such an approach will extend beyond what the local plan can achieve and will involve everybody with an interest in Bedford. A public consultation was carried out on the town centre last year. Responses can be summarised to include: the preference for the town centre for leisure and entertainment (Riverside restaurant complex; independent restaurants); the Embankment and old characterful buildings on the High Street; the evolving cultural centre; little quirks like the “faces statues and twinkly steps”.

A.24 Retail still scored highly as a town centre feature with the number of independent shops noted as more interesting to browse than the chain stores; the variety of retail available – independents and nationwide chains; open markets which allow opportunities to support local businesses (food, crafts and horticulture); community events and festivals; a vibrant mix of cultures and people; connectivity: pedestrianised area of the town centre makes moving from shop to shop easy and relaxed.

Climate change

A.25 Climate change is a fundamental concern for the local plan and it is proposed to enhance current planning policies. Currently the local plan requires new developments to:

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

Environment

A.26 The new environment legislation, includes a package of new duties and obligations to improve nature, such as the production of Local Nature Recovery Strategies and a 10% biodiversity net gain requirement on new development. Any national policy change implemented will require that the Local Plan 2030 contains robust policies relating to the environment. It is expected that these policies will remain active but that the technical work relating to these policies will be updated. To include a new Strategic Flood Risk Assessment, other studies proposed for inclusion in the review will include (but are not limited to):

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

Consultation questions

The consultation questions, together with the Council’s proposed response are set out in Appendix 3 to the Committee report.
Appendix 3: Consultation Form; as submitted

Bedford Borough Council – Local Plan Review
Issues & Options Consultation Paper Response Form

We would prefer to receive your comments via our online system www.bedford.gov.uk/localplanreview

Please only use this form if you cannot respond online and to respond to the questions raised in the Local Plan Review Issues & Options Consultation Paper. It should be completed alongside the consultation paper. Copies of the document are available to view on the Council’s website www.bedford.gov.uk/localplanreview and in paper copy (by appointment) at our Customer Service Centre 2 Horne Lane, Bedford MK40 1RA (01234 267422). Paper copies will also be made available at all libraries in the borough, plus Rushden, St Neots, Biggleswade and Flitwick libraries during normal opening hours should COVID restrictions be lifted during the consultation period.

Please email this response form to us: planningforthefuture@bedford.gov.uk

Alternatively responses can be sent by post. Please attach a stamp and send to:

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

PLEASE DO NOT SUBMIT COMMENTS IN MORE THAN ONE FORMAT OR SEND TO MORE THAN ONE EMAIL ADDRESS. If you have submitted comments electronically you do not need to print and post them. All responses (electronic and paper) must be received by 5pm on 4 September 2020.

Your contact information will be kept on the Planning Policy database so that we can keep you up to date about this and other planning policy documents. Personal data will be collected and processed in accordance with the Data Protection Act and the General Data Protection Regulations. Further information can be found on the council’s Data Protection webpage and in the Privacy Notices for planning policy.

All responses will be made public.

CONTACT DETAILS

Personal details

Title _____________________________________________________________

Name _____________________________________________________________

Job title (if applicable) Principal Planning Policy Officer _________________________________

Organisation (if applicable) East Northamptonshire Council__________________________________

Address Cedar Drive ___________________________________________________

Thrapston___________________________________________________________

Postcode NN14 4LZ____________________________________________________

Telephone Number 01832 742010 _____________________________________________

Email planningpolicy@east-northamptonshire.gov.uk ________________________
AGENT DETAILS (if applicable)

Title: n/a ___________________________________________________________

Name: ______________________________________________________________

Job title (if applicable): ________________________________________________

Organisation (if applicable): ______________________________________________

Address: _____________________________________________________________

Postcode: _____________________________________________________________

Telephone Number: _____________________________________________________

Email: ________________________________________________________________

If you are using an agent, who would you prefer any correspondence to go to?
(Please mark X one box only)

Contact agent ☐  Contact client ☐  Contact both ☐

Your interest (Please mark X one box only)

Land owner ☐  Resident ☐  Consultant ☐  Agent ☐  Other ☒

Please specify 'Other' (please write in)

Neighbouring local planning authority

Q1 Do you agree with the proposed scope of the local plan review? If you think that other areas of existing policy should be updated or new policy areas added to the list, please explain what they are and your reasons for wanting them to be included in the plan.

The proposed scope of the Local Plan Review is very extensive and is supported. The inclusion of matters such as addressing climate change improving quality of developments and repurposing (diversification) of the town centres are all welcome.

This Council’s particular interest is in the development of a new spatial strategy and the six alternative potential growth strategies that are proposed.

Q2 Do you have any comments on the draft vision? If you think that it can be improved, please tell us how.

The vision appears to be quite extensive. It is noted that this focuses upon east/ west connections; e.g. east/ west rail (with A421 corridor) and green infrastructure opportunities; particularly the Bedford to Milton Keynes Waterway Park and Forest of Marston Vale.

The vision appears to have an overwhelming southern focus. It does not address opportunities that could be opened up through enhanced north/ south connections; e.g. along the Midland Mainline/ A6 corridor. It is noted that further consideration is being given to opportunities in the northern parts of the Borough; e.g. related to the strategic growth proposals at towns in close proximity to the Borough Boundary – Rushden, St Neots and Wellingborough, but it is emphasised that any such proposals should be properly supported through significant infrastructure provision.
Q3  In line with Government policy, the shortest plan period would be 2020 to 2040. Do you agree with this plan period? If you think the plan period should be longer, what plan end-date would you suggest and why?

It is proposed that the Bedford Local Plan could have a 2050 end date (rather than 2040); to correspond with the emerging Oxford to Cambridge Arc growth/spatial strategy. This would also be consistent with other emerging Local Plan Reviews within the Oxford-Cambridge Arc; e.g. West Northamptonshire Strategic Plan, which will set out a spatial vision for the future of the area extended up to 2050.

Q4 Having considered the potential locations for growth illustrated above, and the pros and cons in Table 1, which one(s) if any do you support? It may be that the local plan strategy will need to combine elements from more than one of the locations to achieve the scale of growth required. Can you suggest other locations?

It is noted that there are six alternative spatial options for growth. Of the six options, the yellow, pink and orange approaches are similar, insofar as these focus upon the A421 and east/west rail corridor. The other options could have implications for adjoining local authorities to the north (East Northamptonshire, Wellingborough and Huntingdonshire), as follows:

- **Urban based growth (brown option)** – Potentially significant implications, as this includes potential proposals for urban extensions to the south of Rushden and west of St Neots
- **Dispersed growth (grey option)** – Some implications, due to the potential increased scale of development at villages to the north of Bedford Borough
- **New settlement based growth (red option)** – Potentially significant implications for East Northamptonshire, as three of the four potential locations are situated along the Midland Mainline/A6 corridor.

**Red and brown options – potentially significant implications for East Northamptonshire**

In the case of the new settlement based growth option, this was previously proposed for the current Local Plan. This Council (Planning Policy Committee, 19 February 2018, Item 6) raised concerns about the Colworth proposal. While there was no objection in principle to Colworth Garden Village, it was considered that the evidence base was insufficiently robust in relation to green infrastructure and the strategic road network. If this approach is revived in the new Bedford Local Plan, then it is emphasised that East Northamptonshire Council’s previous concerns should be satisfactorily overcome.

The brown option is a significant new proposed spatial strategy. The Local Plan 2030 and previous Core Strategy focused upon growth around the Bedford/Kempston urban area, with the rural north of the Borough regarded (for spatial planning purposes) as rural, although the Local Plan 2030 does include proposals for a strategic allocation at Sharnbrook. It is emphasised that the proposals for urban extensions to the south of Rushden (Wymington Parish) will have implications for Rushden and Wellingborough. At this stage, it is recognised that these could present new growth opportunities. The Council’s consideration of these proposals are summarised as follows:

- **It is noted that the Plan acknowledges the potential for SUEs/growth adjoining Rushden and St Neots, although in the case of the possible expansion of the Rushden urban area to the south this was previously assessed in the Rushden Sustainable Urban Extension Background Paper (January 2015), but significant concerns such as coalescence of Rushden and Wymington were highlighted;**
- **It is emphasised that Rushden and St Neots are significant urban centres, both already hosting major growth over the next 20-30 years, so it is critical that adjacent local authorities and infrastructure providers work closely together to ensure delivery of development in a coordinated manner;**
- **It is unclear from the document the exact location of potential growth to the south of Rushden, although this could potentially be supported if it provides a catalyst for the development of significant infrastructure provision, such as a new rail station at Wymington, located on the Midland Main Line, which could serve the new development and provide opportunities for Rushden and North Northamptonshire.**

Q5 Infrastructure needs building in from the start to ensure new development is suitably accessible and supported. What infrastructure do you consider is key to the delivery of growth in Bedford borough?
The following priorities for East Northamptonshire Council should be noted:

- Upgrades to the A6, particularly if new development is proposed at one or more of the potential new settlements (red option), or if new urban focused growth is to come forward as an extension to Rushden (brown option);
- Delivery of a new rail station, either at Sharnbrook (red option) or Wymington (brown option); in addition consideration should be given to the opportunity for park and ride to serve the wider area;
- Delivery of enhanced green infrastructure connections between the rural hinterland of the Borough and the local Rushden/ Souldrop green infrastructure corridor (North Northamptonshire Joint Core Strategy 2011-2031, Figure 17/ Policy 19).

Q6 More employment sites will need to be allocated alongside housing growth. Where do you think new employment sites can be located in Bedford borough?

*If the Local Plan is to proceed with the red or brown options, new employment should be delivered in line with proposed Rushden/ St Neots urban extensions or the chosen new settlement(s) to provide sustainability.*

Q7 Connectivity to other economic centres, including Oxford and Cambridge, will improve with East-West Rail. How do we capture the benefits of this greater connectivity to these economic centres, to improve and increase the value of the economy of Bedford?

*Any of the yellow, pink and orange approaches, all of which focus upon the A421 and east/ west rail corridor, could potentially secure benefits arising from this key element of the Oxford to Cambridge Arc.*

Q8 Do you have any further views to add to those listed in the Town Centre Plan (see Consultation Responses above)?

Q9 Do you agree that the Council should produce further guidance for developers on how to respond to climate change? If so, what should be included in it?

*The prominent inclusion of climate change within the Local Plan vision is supported, although specific policies to address this will need to be deliverable; i.e. aspirational but achievable.*

Q10 The Government is developing new house-building standards to be implemented through building regulations. Is there any local evidence or need to go beyond national standards?

*Seeking Local Plan standards that go above and beyond the “baseline” requirements of the Building Regulations through the Local Plan could be supported, although it is emphasised that in all cases these are negotiable as part of viability assessments.*
Q11 What do you think would encourage people in Bedford borough to make greater use of sustainable modes of transport?

Bedford Borough is well served by strategic transport corridors, with the A421/ east west rail corridor, and A6/ Midland Mainline corridor. It is noted that the proposed Plan vision highlights the opportunities that the new east/ west rail route will offer, in association with the Oxford to Cambridge Arc.

However, East Northamptonshire Council would also highlight the potential for enhanced connectivity along the north/ south A6/ Midland Mainline corridor.

Q12 If you think that our existing planning policies to protect and enhance the natural environment fail to cover important national or local issues, please give details.

Close engagement and working with the relevant stakeholders (Natural England, Environment Agency and the Wildlife Trust) is critical to maximise opportunities for securing net biodiversity gain and/ or the protection of sensitive natural environmental assets in association with new developments. In particular understanding the future impact of development in the north of the Borough in relation to the Upper Nene Gravel Pits Special Protection Area/ Ramsar site will be critical.

Q13 Is there anything else that is addressed in the new Government guidance that is not adequately covered by existing policies?

It is understood that Bedford Borough will be covered by a single Local Plan, containing both strategic and more detailed/ site specific non-strategic policies. The Local Plan ought to prioritize strategic matters, with localised site specific issues delegated to Neighbourhood Planning.

The benefits of this approach to scoping for the Local Plan would be twofold:

- Minimise the risk of the plan being delayed due to site specific/ land use matters such as the extent of zonal designations (e.g. Local Green Space, settlement boundaries); and
- Incentivise communities to prepare Neighbourhood Plans where these could help to deliver local priorities or aspirations.

If you have any other comments to make please add them below.

Overall, East Northamptonshire Council is keen to continue engaging closely with Bedford Borough Council as the Local Plan progresses. There are potentially significant issues that could arise if significant new development is proposed for the A6/ Midland Mainline corridor; notably the possible Colworth Garden Village or Wymington strategic development proposals.

It is welcomed that the Local Plan is considering an extensive range of potential spatial development strategies (at least six possible approaches). It is reiterated that East Northamptonshire Council could potentially support strategic development proposals where these deliver tangible infrastructure projects, such as a new Midland Mainline rail station (be it at Colworth/ Sharnbrook or Wymington). Any proposed development to the south of Rushden would benefit from future joint Masterplanning, which engages both Local Planning Authorities and other relevant partners.

Please note that these comments are submitted as a draft officer response on behalf of East Northamptonshire Council to meet the 4 September 2020 consultation deadline. This draft response is being presented to the Planning Policy Committee for Member endorsement of 21 September. The Committee may propose amendments or additions to these comments that will be incorporated into the finalised response, which will be submitted to Bedford Borough Council soon after the 21 September 2020 meeting.

If you would like to put forward a potential development site (Call for Sites) for consideration please visit the website [www.bedford.gov.uk/localplanreview](http://www.bedford.gov.uk/localplanreview) for further information and advice.
Brown - Urban based growth

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

Pros - advantages

• Supports services, facilities and businesses in urban areas, particularly Bedford town centre.
• Urban locations have the greatest potential for residents to make sustainable travel choices (walking, cycling and public transport).
• Increasing development density improves public transport viability.
• Makes good use of brownfield and under-used land. Higher density development more appropriate in urban locations.
• Reduces need for growth in rural areas.
• More employment uses (e.g. business services) within centre will improve viability and create direct benefits of other associated business uses such as retail and leisure.

Cons - disadvantages

• Opportunities for growth within urban areas are limited, so most growth would be on edge of urban area and closer to existing villages.
• Very high density schemes could be out of character and affect local distinctiveness.
• Growth may overstretch existing services, facilities and infrastructure in towns.
• Expansion of Rushden and St.Neots (within Bedford Borough) may not be supported by those towns.
• Rural locations would miss the benefits associated with growth.
• Restricted sites sizes can restrict scheme options and opportunities to mitigate risk for investors.
• More development at high density in the urban area may contribute to poor air quality issues.
Red - New settlement based growth

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

Pros - advantages
- Potential for sustainable growth using garden village principles, creating self-contained new communities with good infrastructure provision.
- Would reduce the amount of development that must be accommodated in other locations.
- Detached ‘rural’ setting enable property construction and create ambiance which higher value occupiers aspire to.
- Provides opportunities for sustainable and active transport links, both between new settlements and to the urban areas.

Cons - disadvantages
- New settlements take a long time to plan and build, leading to short to medium-term housing supply shortages.
- There could be an adverse impact on local landscapes, loss of agricultural land and countryside.
- Issues with new settlement proposals previously put forward would need to be resolved before they could be allocated.
- Significant new infrastructure may be required to accommodate growth.