

RECORD OF EXECUTIVE DECISION TAKEN BY AN EXECUTIVE MEMBER

This form **MUST** be used to record any decision taken by the Elected Mayor or an individual Executive Member (Portfolio Holder).

The form must be completed and passed to the Chief Officer responsible for Legal and Democratic Services no later than NOON on the second working day after the day on which the decision is taken. No action may be taken to implement the decision(s) recorded on this form until 7 working days have passed and the Chief Officer responsible for Legal and Democratic Services has confirmed the decision has not been called in.

1. Description of decision

- (1) That the Tall Buildings Guide – Urban Area, as detailed in Appendix B to the attached report prepared to accompany the decision, be formally adopted as a Supplementary Planning Document.
- (2) That the Head of Planning and Building Control be authorised, in consultation with the Portfolio Holder for Economic Prosperity, Planning, Housing and Regulatory Services, to make any essential minor amendments prior to publication.

2. Date of decision

29 June 2026

3. Reasons for decision

- (1) As set out in government guidance, local authorities must formally adopt supplementary planning documents before 30 June 2026 under the current planning system. Any supplementary planning documents (known as SPDs) that are formally adopted before this date will be saved. They will remain in force and will be a material consideration in the determination of planning applications across the borough until the new Bedford Borough Local Plan is adopted under new plan-led system. This will include the borough's existing suite of design codes and development briefs.
- (2) The adoption of this Supplementary Planning Document (SPD) will provide guidance to applicants, communities and decision makers and will help secure consistent design outcomes during the assessment and determination of tall building proposals in the urban area, in line with the policies set out in the adopted Bedford Borough Local Plan 2030 (adopted in 2020) and the Allocations and Designations Local Plan (adopted in 2013). The SPD will also help reduce uncertainty when dealing with speculative planning applications and improve the effectiveness of these policies.

4. Alternatives considered and rejected

The alternative option of not adopting the SPD has been rejected. This would reduce the weight given to design considerations in planning decisions and weaken Bedford Borough Council's ability to secure high-quality development across the borough. Delaying adoption beyond the government deadline has also been rejected: the SPD cannot be adopted after 30 June under the current plan system and the opportunity to secure its formal status would be lost.

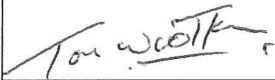
5. How decision is to be funded

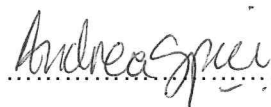
All costs associated with preparation and consultation have been covered using existing budgets.

6. Conflicts of interest

Name of all Executive members who were consulted AND declared a conflict of interest.	Nature of interest	Did Standards Committee give a dispensation for that conflict of interest? (If yes, give details and date of dispensation)	Did the Chief Executive give a dispensation for that conflict of interest? (If yes, give details and the date of the dispensation).

The Mayor has been consulted on this decision

29 June 2026


Signed: 

Date: **29 June 2026**

Name of Decision Taker: **Cllr. Andrea Spice**
Portfolio Holder for Economic Prosperity, Planning, Housing & Regulatory Services

This is a public document. A copy of it must be given to the Chief Officer responsible for Legal and Democratic Services as soon as it is completed.

Date decision published: 30 June 2026

Date decision can be implemented if not called in: 9 July 2026

(Decision to be made exempt from call in.....NO.....)

Bedford Borough Council – Executive Decision

Date of Report: 29 June 2026

Report by: Portfolio Holder for Economic Prosperity, Planning, Housing & Regulatory Services and Head of Planning and Building Control

Subject: BEDFORD BOROUGH TALL BUILDINGS GUIDE – URBAN AREA: SUPPLEMENTARY PLANNING DOCUMENT

1. EXECUTIVE SUMMARY

- 1.1 This report seeks approval to adopt the Tall Buildings Guide – Urban Area Supplementary Planning Document (SPD). The guidance identifies appropriate locations, design principles, assessment criteria and townscape considerations related to tall buildings within the urban area of Bedford.
- 1.2 The document was subject to statutory public consultation between March and April 2026. The feedback received has shaped the final version (see **Appendix B**) and the consultation responses and Bedford Borough Council’s responses are outlined in **Appendix A**.

2. RECOMMENDATIONS

2.1 Executive is asked to consider this report and, if satisfied, to:

- (a) **Formally adopt the Tall Buildings Guide – Urban Area, at Appendix B, as a supplementary planning document.**
- (b) **Authorise the Head of Planning and Building Control, in consultation with the Portfolio Holder for Economic Prosperity, Planning, Housing & Regulatory Services, to make any essential minor amendments prior to publication.**

3. **REASONS FOR RECOMMENDATIONS**

- 3.1 Adopting this SPD will provide guidance to applicants, communities and decision makers and will help secure consistent design outcomes during the assessment of tall building proposals in the urban area, in line with the policies set out in the adopted Bedford Borough Local Plan. The document will also help reduce uncertainty when dealing with speculative planning applications and improve the effectiveness of these policies.

4. **THE CURRENT POSITION**

- 4.1 There is currently no specific guidance on tall buildings in the borough and the document will provide future guidance on this type of development in the urban area.

5. **DETAILS**

- 5.1 The *Tall Buildings Guide – Urban Area Supplementary Planning Document* provides clarity on the suitability of tall building proposals in the urban area of Bedford. It outlines the criteria and considerations necessary to ensure that tall buildings are compatible with the existing urban environment, contribute positively to the borough’s skyline and protect the setting of significant heritage, views, amenity and townscape. All proposals should align with the policies established in the adopted Bedford Borough Local Plan.
- 5.2. The public consultation on the Tall Buildings Guide – Urban Area and the other supplementary planning documents¹ ran from 6 March 2026 to 17 April 2026, which included a two-week extension to enable additional engagement and participation from a range of stakeholders, including residents, town and parish councils and government agencies. **Appendix A** provides a full schedule of representations and Bedford Borough Council’s responses, outlining the proposed changes to the draft documents.
- 5.3 These changes are primarily minor in nature and seek to provide clarification and refinement, rather than altering the overall purpose or scope of these documents.

¹ Bedford Borough Design Code – Urban and Suburban Areas; Bedford Borough Design Code – Large Urban Extensions and New Settlements

6. ALTERNATIVES CONSIDERED AND REJECTED

- 6.1 The alternative option of not adopting the SPD has been rejected. This would reduce the weight given to design considerations in planning decisions and weaken Bedford Borough Council's ability to secure high-quality development across the borough. Delaying adoption beyond the government deadline has also been rejected: the SPD cannot be adopted after 30 June under the current plan system and the opportunity to secure its formal status would be lost.

7 KEY IMPLICATIONS

Legal issues – relevant legal power

- 7.1 Recent government announcements on the new planning system confirm that Supplementary Planning Documents (SPDs) will no longer form part of the reformed framework. Existing and emerging SPDs will remain in force until local planning authorities adopt a new-style Local Plan. However, the final date to adopt any new SPDs is 30 June 2026, ensuring that advanced emerging SPDs can still be brought forward, as set out in schedule 1 of The Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026.
- 7.2 The most relevant aspects to this exercise are as follows:
- A minimum four-week consultation period must be provided to enable individuals to submit comments on the supplementary planning document.
 - As part of the consultation process, a statement must be published setting out the persons consulted in the preparation of the supplementary planning document, a summary of the issues raised, and how these have been addressed.
 - As soon as reasonably practicable following adoption, an adoption statement must be published. This must specify the date of adoption and include details of the availability of judicial review.

Policy issues

7.3 The documents support the implementation of design-related policies within the current adopted Bedford Borough Local Plan, notably:

Policy 28S – Place-making

Policy 29 – Design quality and principles

Policy 30 – The impact of development – design impacts

7.4 SPDs do not establish new policies. Rather, they offer detailed guidance to support the consistent application of existing adopted policies set out in the Local Plan and enhance the quality of future planning submissions in the borough.

The Tall Buildings Guide sets out criteria addressing height, massing, views, heritage impacts and townscape issues within the urban area of Bedford, with a particular focus on the town centre.

Resource issues

7.5 All costs associated with preparation and consultation have been covered using existing budgets.

Risks

7.6 Not adopting the SPD would reduce the council's ability to secure high-quality design, may weaken the defensibility of decisions at appeal and would leave gaps in guidance at a time of increased development pressure and national design expectations.

Environmental implications

7.7 The sustainability appraisal (SA) screening concluded that an SA was not required as the document does not contain any new policies and the parent policies were appraised as part of the Bedford Borough Local Plan 2030 process.

7.8 Public consultation activities took place in line with the Bedford Statement of Community Involvement, with electronic communication used where appropriate.

Equalities impact

7.9 Due regard has been given to the Public Equality Duty under Section 149 of the Equality Act 2010. The SPD does not raise equality concerns, and an equality impact assessment is not required. The documents also support the implementation of adopted Bedford Borough Local Plan policies that were previously subject to equality analysis.

Impact on families

7.10 The proposed SPD do not have a direct impact on families.

Community safety and resilience

7.11 The proposed SPD is not considered to have a direct impact on community safety and resilience, however good design in the built environment will be beneficial to the community through enhancements in quality, safety and overall living conditions.

Impact on health and wellbeing

7.12 The proposed document will have an indirect impact on health and wellbeing promoting good design in the built environment.

8. SUMMARY OF CONSULTATIONS AND OUTCOME

8.1 The following units or officers have been consulted in preparing this report:

- Chief Officer for Finance
- Manager for Legal
- Service Director Regulation, Housing & Customer Contact
- Equalities Officer
- Chief Officer for Education
- Community Safety and Resilience
- Public Health

8.2 No adverse comments have been received.

9. WARD COUNCILLOR VIEWS

9.1 Not applicable to this report.

10. CONTACTS AND REFERENCES

Report contact officer:	Philip Wadsworth Manager for Planning Policy and Strategy (01234) 718567 Philip.wadsworth@bedford.gov.uk
Declarations of interest	None
File reference:	N/A
Previous relevant minutes:	None
Background papers:	None
Appendices:	Appendix A: Schedule of consultation responses and officer responses Appendix B: Tall Buildings Guide –Urban Area

Bedfordshire Fire Service

Topic or reference	Comment	Response
Emergency vehicle access & street design	<p>All three documents place strong emphasis on street hierarchy, sustainable movement and reduced car dependency (e.g. primary, secondary and tertiary routes; active travel corridors; pedestrian priority areas). While this aligns with contemporary planning goals, it is essential that fire appliances maintain unobstructed access to buildings, public spaces and hydrants.</p> <p>BFRS recommends that the design codes include explicit requirements to:</p> <ul style="list-style-type: none"> • Meet Approved Document B (ADB) access standards, including fire appliance reach distances and minimum road widths. • Ensure bollards, street trees, planters, cycle lanes and home-zone features do not obstruct fire appliance movement. • Require vehicle swept-path analysis using a fire appliance template for all major planning applications. • Avoid long cul-de-sacs unless compliant turning heads are incorporated. • Ensure emergency access is maintained to new open spaces, linear parks and green/blue corridors referenced throughout the codes. 2. 	<p>Insert into the two design codes:</p> <p><i>New development must address emergency service requirements such as access and provision, water supply and safety principles) at the masterplanning and layout stage, including how it will be integrated into street hierarchy, block configuration, green infrastructure provision and layout and access arrangements. Detailed regulatory and procedural requirements will be managed through separate statutory processes, with engagement with Bedfordshire emergency services where appropriate. Early engagement with Bedfordshire emergency service representatives is strongly encouraged.</i></p>
Water supplies for firefighting	<p>The design codes do not explicitly reference water for firefighting. Given the scale of new development envisaged, particularly large urban extensions and higher density neighbourhoods, this is a critical omission. BFRS requests that the documents include guidance requiring:</p>	

	<ul style="list-style-type: none"> • Early engagement with BFRS to plan fire hydrant locations, spacing and flow requirements. • Developers should meet the full cost of installing fire hydrants as required under Section 42 of the Fire & Rescue Services Act 2004, supported by any additional local funding mechanisms adopted by the Fire & Rescue Authority. • Hydrants to be positioned to support high density, mixed use and taller buildings, which may increase demand on firefighting operations. Urban extensions and new settlements propose significant new street networks and building clusters where strategic water supply planning is essential for operational response and life safety. 	
<p>Green/blue infrastructure & wildfire risk</p>	<p>The codes emphasise extensive green and blue infrastructure networks, green roofs, street trees and woodland integration across new settlements and suburban areas. We recommend:</p> <ul style="list-style-type: none"> • Clear access routes for fire appliances into larger green corridors and parks. • Consideration of wildfire mitigation measures in larger or heavily wooded sites. • Fire breaks and species selection guidance for green roofs/walls. 	
<p>Fire safety at master planning stage</p>	<p>Across all three documents, there is strong emphasis on early master planning, block configuration, street hierarchy and design coding. BFRS requests that the council require:</p> <ul style="list-style-type: none"> • Early-stage Fire Statements for major developments. • Inclusion of an outline fire strategy at master planning stage covering access, water supply, evacuation, façade materials and firefighting provisions. • Direct consultation with BFRS prior to submission of detailed applications for large or complex sites. 	

<p>Firefighting shafts, risers, firefighting lifts and evacuation lifts for buildings above relevant height thresholds.</p>	<ul style="list-style-type: none"> • Smoke control systems suitable for the building’s scale and layout. • External façade fire performance, including compliance with Building Regulations Regulation 7(2) for buildings over 18m. • Building massing and access arrangements that ensure adequate perimeter access for fire appliances. • Clear evacuation and stay put/evacuate strategies, including considerations for vulnerable persons. 	<p>Fire safety and evacuation measures are addressed through building control and other regulatory regimes. However, access is a relevant planning consideration.</p>
<p>Building separation & fire spread</p>	<p>Several sections across the design codes encourage:</p> <ul style="list-style-type: none"> • Continuous frontages • Terraced forms • Courtyard blocks • Perimeter blocks • Higher-density town centre development <p>These urban forms can reduce separation distances and increase the risk of external fire spread. We therefore recommend:</p> <ul style="list-style-type: none"> • Explicit consideration of minimum separation distances and external fire spread between buildings, in line with Approved Document B. • Early fire engineering input where tighter urban grain is proposed, e.g. in town centre mixed use zones and high density new settlements. • Clear acknowledgement that block form and density choices affect fire risk, especially when incorporating green walls, timber, or novel materials. 	<p>Fire safety and evacuation measures are addressed through building control and other regulatory regimes. However, emergency access is a relevant planning consideration.</p> <p>Amend text of Tall Buildings Guide – Urban Area SPD and Bedford Borough Design Code – Urban and Suburban Areas to include:</p> <p>Tall and higher-density development must prioritise public safety through building form, layout and density that enable safe and effective emergency access from the outset, particularly in constrained urban and town-centre locations, in accordance with the Bedford Borough Design Guide and the Tall Buildings Guide – Urban Area.</p>

	<p>These building types are heavily promoted in the Urban Area Design Code and New Settlements Code and must therefore be fully supported by robust fire design principles.</p>	
<p>High-risk building types (Care homes, multi-residential, mixed use)</p>	<p>The suburban and large residential typologies include care homes, flats, mixed-use buildings and higher-density homes. These occupancies commonly have:</p> <ul style="list-style-type: none"> • Vulnerable residents • Complex evacuation requirements • Increased fire loading <p>We recommend:</p> <ul style="list-style-type: none"> • Reference to enhanced fire precautions (e.g., sprinklers) in higher-risk building types. • Requirement for robust evacuation strategies at planning stage. • Avoidance of single-staircase residential buildings above appropriate thresholds. These uses are explicitly identified in the larger residential area typologies within the Urban & Suburban Design Code. 	
<p>EV charging, parking courts and car-dominant elements</p>	<p>The documents highlight parking courts, undercroft parking, on-plot parking and multi-storey car parks as common features in suburban, town centre and new settlement designs. BFRS advises:</p> <ul style="list-style-type: none"> • Incorporation of guidance on EV charging point fire safety, including spacing, ventilation, and access for firefighting. • Caution against hidden or enclosed parking courts, which the codes already identify as problematic in Great Denham and similar areas. 	
<p>Bin stores, refuse and waste management</p>	<p>The Tall Buildings SPD references waste strategies but further clarity is needed. We recommend:</p> <ul style="list-style-type: none"> • Clear minimum distances between bin stores and building entrances. • Fire-resistant enclosures for communal waste storage. 	<p>The Tall Buildings SPD already highlights the need for well-designed waste and servicing strategies as part of safe and functional development. We agree that these matters are important considerations; however, more detailed requirements relating to separation distances, fire resistance and egress routes are more</p>

Appendix A

	<ul style="list-style-type: none"> • Avoiding refuse storage in egress paths or within access routes for fire appliances 	appropriately addressed through Building Regulations, fire safety legislation and detailed design at application stage. The SPD will continue to focus on high-level design principles while recognising that detailed compliance will be secured through other regulatory processes.
Green/blue infrastructure & wildfire risk	<p>The codes emphasise extensive green and blue infrastructure networks, green roofs, street trees and woodland integration across new settlements and suburban areas. We recommend:</p> <ul style="list-style-type: none"> • Clear access routes for fire appliances into larger green corridors and parks. • Consideration of wildfire mitigation measures in larger or heavily wooded sites. • Fire breaks and species selection guidance for green roofs/walls. 	<p>Add to the two design codes: <i>New development must address emergency service requirements such as access and provision, water supply and safety principles at the masterplanning and layout stage, including how it will be integrated into street hierarchy, block configuration, green infrastructure provision and layout and access arrangements. Detailed regulatory and procedural requirements will be managed through separate statutory processes, with engagement with Bedfordshire emergency services where appropriate. Early engagement with Bedfordshire emergency service representatives is strongly encouraged.</i></p>
Fire safety at master planning stage	<p>Across all three documents, there is strong emphasis on early master planning, block configuration, street hierarchy and design coding. BFRS requests that the council require:</p> <ul style="list-style-type: none"> • Early-stage Fire Statements for major developments. • Inclusion of an outline fire strategy at master planning stage covering access, water supply, evacuation, façade materials and firefighting provisions. • Direct consultation with BFRS prior to submission of detailed applications for large or complex sites. 	

Bedfordshire Police

Topic or reference	Comment	Response
Section 3, page 61	Design Code SPD: The National Model Design Code states on that “ <i>Neighbourhoods need to be designed to make all people feel</i>	Add to Design Code and Suburban Areas: <i>Development should demonstrate layouts,</i>

	<p><i>safe and to reduce the incidence of crime in accordance with the recommendations of Secured by Design (SBD) which includes guidance for housing, commercial space, schools, hospitals and sheltered accommodation. Support and advice are available from the police through a network of Designing Out Crime Officers (DOCOs) across the UK. Secured by Design advice incorporates proven crime prevention techniques and measures into the layout and design of places and spaces.”</i></p>	<p>streets, public spaces and buildings that address crime prevention and community safety, consistent with ‘secured by design principles’ set out in the Bedford Borough Design Guide.</p> <p><u>Amend Large Urban Extensions and New Settlements:</u> Well-designed streets, layouts and public spaces should integrate ‘secured by design’ principles – such as active frontage and clearly defined public and private spaces – to enhance safety, encourage social interaction and create a welcoming public realm, in line with the Bedford Borough Design Guide. Practical elements like adequate lighting, physical protection such as gates and natural surveillance should be integrated to support safe and secure environments. Early engagement with Bedfordshire emergency services is encouraged.</p>
Secured by design	<p>The Bedford Borough Local Plan 2040 Draft will support the promotion of Secured By Design (SBD). This will ensure that developers properly consider the measures involved in designing out crime to create and maintain a sustainable community in accordance with the National Model Design Code, the National Planning Policy Framework, Bedford Borough’s Sustainable Community Strategy, and Section 17 of the Crime & Disorder Act 1998. Bedfordshire Police will therefore be encouraging all local neighbourhood plans to incorporate the Secured By Design principles and, where applicable, to apply for the SBD Developers Award.</p>	<p>The Local Plan 2040 has been withdrawn and does not form part of the borough’s development plan</p>
Design out crime	<p>The Bedford Design Guide 2023 promotes designing out crime on page 211 under <i>Design Principle 7: Consider local settlement and street patterns.</i></p>	<p>Noted.</p>
DOCOs	<p>Bedfordshire Police have 2 DOCOs available to provide advice and guidance for developers and we are contactable at doco@beds.police.uk. Beds Police DOCOs are also consultants on planning applications and our responses are primarily concerned with the prevention of crime and disorder within the built</p>	<p>Noted.</p>

	environment, using the principles of CPTED (crime prevention through environmental design).	
Noted	To give a brief summary of SBD, it is a long-running flagship initiative of the National Police Chiefs' Council. Its objective is to design out crime during the planning process. It is a highly respected standard in the sector, supported by numerous public bodies and professional organisations. SBD is therefore a vital guidance resource for planners and developers. SBD is available online, regularly updated and consequently, there is no danger of it ceasing to exist during the lifetime of the Local Plan. It should be noted that SBD can be applied to all sizes of new build developments, (residential, community, educational, leisure and commercial), self-builds and refurbishments.	Noted.

Canal & River Trust

Topic or reference	Comment	Response
All	Thank you for your consultation on the above document. We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal & River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework. The Trust have no waterways within the area	Noted.

	<p>covered by the document and as such we have no comment to make. However, one of the Canal & River Trust’s charitable objects is to promote, facilitate, undertake, and assist in for public benefit, the restoration and improvement of inland waterways. We are, therefore, generally supportive of any sustainable project seeking to expand or support the country’s inland waterway network. As well as being an interested party, in light of our charitable objective, the Trust is also a member of the Bedford & Milton Keynes Waterway partnership and supports the proposed Bedford & Milton Keynes Waterway Park which is being promoted by the B&MK Waterway Trust. We would suggest that every opportunity is taken to ensure that the future development alongside the new water space positively addresses and integrates the water and, by providing appropriate facilities, opens up access to it for all. Therefore, if not already, B&MK Waterway Trust should be consulted on the Design Code SPDs so that any potential design considerations for development adjacent or close to the waterway route may be incorporated, as appropriate.</p>	
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Elstow Parish Council

Topic or reference	Comment	Response
	<p>Having three very different consultation end dates is confusing, even more so given this consultation was relatively short, being only around 4 weeks, which means effective engagement for Parish Councils as the first tier of local government have been limited with being able to fully reflect and consider these important consultation documents</p>	<p>Four weeks is the statutory consultation period applicable to Supplementary Planning Documents and also the time period as set out in the Statement of Community Involvement. The consultation period was extended a further two weeks, closing on 17 April enabling additional engagement to take place. However, it is acknowledged that inconsistent dates appeared across the website, email communications and some consultation documents. This lack</p>

		<p>of clarity is regrettable, and it was an oversight that consultees were not made aware of the additional consultation period.</p>
<p>Design Code – Urban and Suburban Areas</p>		
<p>Pages 76, 77, 86, and 101</p>	<p>As a rural village community, Elstow Parish Council, are mindful that whilst some of the parish is considered to sit within the urban area, it remains absolutely critical that Bedford Borough Council remember and respect that Elstow is a rural village. From the document presentation it is disappointing to see that Elstow as a rural parish in this planning policy document, like Biddenham, has not been specifically mentioned and highlighted that these areas must be treated differently from other areas. The Parish Council feel the mapping is poor and misleading, as there needs to be a clear distinction maintained for Elstow and its special character as a rural village. The misrepresentation in the mapping is very disappointing for Elstow and its residents. On closer review of the document, there are illustrative maps on Pages 76, 77, 86, and 101 of this document, which are very challenging to read accurately. Having tried various different methods and techniques to enlarge the map presented, to try and identify the areas within the purple and yellow colour coding, located in the southern part of the diagram, it has been difficult to determine what areas of Elstow might have been included or excluded, which makes it challenging for the Parish Council to provide constructive feedback. Page 77 shows this diagram: The yellow colouring of Elstow that looks to be potentially part of Elstow in the South Avenue and Moss Lane area, would according to the local authority code, consider it to be a suburban neighbourhood, with Putnoe used as the example heavily in the policy document. There are predominately bungalow properties, and no street lights</p>	<p>The character typology maps and associated colour-coding are taken from the adopted Bedford Borough Design Guide: Settlements and Streets (2023). They do not define settlement status, alter parish boundaries, or confer urban or suburban designation on rural villages but rather identify a set of broadly recognisable and comparable characteristics. All proposals will continue to be assessed on a site-specific basis, having regard to local character, landscape setting, and relevant development plan policies.</p> <p>Consequential clarification (legend):</p> <p><i>Please note: Character typologies are taken from the Bedford Borough Design Guide. They do not define settlement status or whether an area is urban or suburban or lies within a rural parish outside the urban area. The extent of the urban area is defined on the Policies Map.</i></p>

	<p>in this part of the village, which is a very rural part of Elstow, and distinctively different in many ways to Putnoe or in fact any other area of Bedford. So this assumption, and grouping is misleading, with absolutely in no way the same planning policies being applicable for this quiet, low density, rural setting as every other yellow coded areas across the maps in the policy document. There must be greater differentiation within the document to set this out so it is abundantly clear that any areas in Elstow are highlighted and protected fully to enable them to keep their very rural identity. The same issue arises for the Abbeyfields areas of Elstow which is colour coded purple it appears, if reading the map correctly. The key suggests this is a modern suburban neighbour and/or suburban extension. The Abbeyfields community is passionate like other parts of Elstow, of being proud of its association to Elstow as a rural village and does not associate itself as part of Bedford or the urban area in any way. Elstow Parish Council would like to make it absolutely clear that no part of Elstow parish, is to be considered urban. Elstow is a rural village, and it is not to be inferred in any way to be part of the urban or suburban area in any way whatsoever.</p>	
<p>Design Code – Large Urban Extensions and New Settlements</p>		
<p>South of Bedford Framework</p>	<p>This document is referenced on many occasions, in the Urban Extensions and New Settlements Design Code policy document. As a Parish Council situated in the vicinity of this area, and with Council representatives being active in all local authority consultations during the Local Plan 2030 and 2040 process, there is no knowledge of this document or where to locate it. There was very brief external consultant engagement with Elstow, like Wilstead received, which then dropped off, with Parish Councillors invited to</p>	<p>References to the South of Bedford Framework in the diagrams and photos will be deleted, while the associated diagrams will be retained as examples of possible design outcomes. The South of Bedford Framework document was not published as it related to a policy in the Local Plan 2040, which was withdrawn in October 2025.</p>

<p>one meeting in November 2023 to discuss a topic paper document relating to the South of Bedford. The terms strategic placemaking were used but there is no awareness this document became a formal strategy or policy document as part of the Local Plan process or outside of the Local Plan process. Having tried to search the Local Plan 2030 examination library as well as the Local Plan 2040 examination library it is not possible to find a document titled 'South of Bedford Framework'. In light of there being no Local Plan 2030 planning policy supplementary document with this name and the Local Plan 2040 was withdrawn, which lists a Topic Paper, please can the Borough Council confirm where the referenced South of Bedford Framework document is to be found given it is clearly a highlighted future of the Urban Extensions and New Settlements Design Code policy across multiple points (pages 13, 15, 17, 19, 20). Can the Borough Council also confirm when the South of Bedford Strategy Framework document was formally adopted by Bedford Borough Council.</p> <p>It has been challenging to comment fully on this important planning policy document which so regularly references the South of Bedford Framework, without being able to access or view this associated planning policy document to read the two side by side, to fully understand the strategic direction the local authority is planning for the South of Bedford and any other urban extension or new settlements. If the local authority are relying on the South of Bedford Topic Paper listed in the Local Plan 2040 library dated 2022, as the document being referenced, then it seems illogical and short sighted on how this associated planning</p>	
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Appendix A

	<p>policy/topic paper for a local plan deemed not to be sound is now being used to shape future developments in the South of Bedford and wider borough area. What is especially concerning is that there has been no local input given when a number of important items have moved on so much in this part of the Borough since 2022 and 2023. As well as given one of the main reasons the Local Plan 2040 was needed to be withdrawn was the lack of highways infrastructure to support the planned strategic growth through till 2040 with Highways England very clear during the examination process also included in the inspection report that the A421 was not able to manage the load for the development. Given this trunk road is the most key part of the highways infrastructure within the South of Bedford it does feel like there is not joined up thinking already taking place at this early stage of a new emerging Local Plan.</p>	
	<p>Images in the Design Code document reflect flats above retail units, the Parish Council feel that the local authority need to have a greater awareness of the challenges for local businesses to thrive in the local area, so there needs to be a careful balance to ensure there are not empty units in the current challenging climate.</p>	<p>Noted.</p>

<p>Page 13</p>	<p>There is reference here and then throughout the policy document to the emerging new Wixams settlement, however, there is no detail of what or where this emerging new Wixams settlement is. This really needs clarifying within the document, as the Parish Council are not sure if this relates to Wixams town emerging or new/additional sites such as the East of Wixams and South of Wixams areas which have both come forward as proposed allocation sites. A diagram or some text clarity within the policy document would be helpful to avoid misunderstanding from the community perspective and developer perspective as it might differ to the Borough Council Officer interpretation. This is relevant to Elstow as the previously proposed allocated site in the Local Plan 2040 at Land East of Wixams, proposed growth towards Elstow which is a great concern for Elstow Parish Council and the local community, therefore the Parish Council would be worried at any potential development trajectory in the direction of Elstow from Wixams.</p> <p>The document for Large Urban Extensions and New Settlements Design Codes references the policy Landscape Character Assessment for the rural area on page 3, it reads that this assessment document sits alongside the LUE and NS policy, however there is no link to the Character Assessment document to view this document, so the two can be reviewed in parallel. As the Character Assessment is referenced early on, and relates to the rural area, the Parish Council had been expecting to be signposted to the document and that this document would also be out for consultation at this time so the two could be reviewed together alongside one another. This again seems</p>	<p>The document will be amended to make it clear that Wixams is referring to existing allocations in the adopted Local Plan and subsequent implemented permissions.</p> <p>Page 13:</p> <p>Amend the following:</p> <p><i>“Original illustrations of the proposed railway station at Wixams. The station will now come forward is now being reconsidered as a higher-capacity rail facility serving both Universal and the strategic allocation at emerging new Wixams settlement identified in the adopted Local Plan, subject to further design development and statutory approvals. Wixams is a long-standing strategic allocation, with development delivered through outline and reserved matters permissions and a safeguarded railway station within the masterplan”.</i></p>
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	<p>short sighted as it is a very key factor for new settlements or any large housing development whether as part of an urban growth area or new settlement in a rural area. The Parish Council were expecting if the two documents were so interlinked that they would be consulted on at the same time to enable a joined up approach going forwards. Whilst the above comments are aligned with Wilstead's position, Elstow Parish Council feel it is important to raise these concerns equally with the Borough Council as any growth or changes to the nearby local area, around Wixams and/or Wilstead will in turn have a detrimental impact on Elstow village, which has a significant issue already in being used as a 'rat run' by vehicles trying to beat the endless queues at all hours along the A6.</p>	
<p>Tall Buildings Guide – Urban Area</p>		
<p>General</p>	<p>This document appears to on the surface deal with tall buildings which would not seem relevant to a rural community like Elstow, however, on closer review it in fact references Elstow a number of times throughout. The Parish Council have the following observations to make on this: Page 5 includes St Pauls Church, as one of the 5 or 6 storey high buildings, it seems strange that Elstow Abbey is not included given its height. The Parish Council feel the heritage asset needs referencing due to its height, and its prominence, as well as given it is mentioned numerous times further throughout the document.</p>	<p>Elstow Abbey is mentioned in paragraph 2.19 and 2.23.</p>
<p>Page 7</p>	<p>The Parish Council feel the synopsis is weak, when compared to the Biddenham and Kempston references. Elstow's summary is totally inadequate, the description must be strengthened significantly further given the direct link to John Bunyan and heritage assets of such high value in Elstow. Elstow has an exceptionally large number of</p>	<p>Replace paragraph 2.14 with: <i>Elstow is a village of exceptional historic and cultural significance, defined through Elstow Abbey, founded in the twelfth century, and its strong association with John Bunyan. The abbey formed the spiritual and economic focus of the settlement, with accommodation, shops and inns developing</i></p>

	<p>historic assets in the conversation area in comparison to Biddenham and Kempston who are mentioned. Page 8, paragraph 2.14 again needs to have more stronger wording to reflect the rich history of Elstow better over time.</p>	<p><i>during the medieval period to serve religious life and visiting pilgrims.</i></p> <p><i>Following the dissolution, Elstow continued to thrive as an agricultural village, benefitting from its location on the historic north-south route between Bedford and Luton. Today, the village retains an unusually rich concentration of heritage assets within a well-preserved conservation area. Its form reflects this layered history, combining expansive open spaces associated with the abbey and its setting with dispersed historic buildings, alongside a denser cluster along the High Street. This depth of historic character remains central to Elstow's identity and sense of place.</i></p>
Paragraph 2.19	<p>The section needs to have a picture of the Elstow Abbey and tower, given some high value assets are exemplified and pictured, the PC feel strongly that Elstow Abbey needs to have a map and be included given it is such a significant structure of historic importance. Further rationale for this is the local authority need to be respectful of how significant Elstow Abbey is viewed in planning policy terms, given the Inspector at the Local Plan 2024 hearings directed that the Abbey view was so high value that it must be protected. The proposed housing site in Elstow parish was the only housing site directed to be removed from the local plan by the inspector. The lack of pictures, mapping, and reference dilutes its importance which is not acceptable. This feedback applies to Paragraph 2.23 as well.</p>	<p>Amend paragraph 2.25:</p> <ul style="list-style-type: none"> • <i>the grade 1 listed, 13th-century bell tower and remaining church structures of Elstow Abbey - set on open land near Elstow Brook - which stand out due to their height and visibility across a wide area, forming an important landmark to the south of Bedford. The detached bell tower and remaining church structures are visible from nearby industrial areas and modern residential neighbourhoods, reinforcing its significance within the wider townscape.</i> <p>Add photograph and include the source (https://www.elstow-abbey.org.uk)</p>



Tall Buildings Guide – Urban Area

Page 11

There needs to be greater prominence in the policy document to ensure protection of views to this landmark. Whilst there is an image of the abbey on Page 11 it shows the side of the heritage asset that is seen from the village. There must be reference to the need to protect the view of the feature from the other side across towards the direction of the A6, as that aspect is the one most under threat. All sides and angles of the asset must be protected. Given the local authority have applied this level of clear protection within the policy document to St Paul's Church, which is in fact located in an entirely built up area, so already rather surrounded with hardly any available area nearby that could impact or intrude on the important views to the asset in the local area, as reflected on the accompanying detailed map and explanation of how the building needs to be protected in the policy. Elstow Parish Council feels this same level of

We recognise the importance of safeguarding the setting of key heritage landmarks and the contribution that views from multiple directions make to their significance. The guidance already requires proposals to demonstrate an understanding of the impact of height, massing and location on heritage assets and their settings, including effects on views and townscape character.

However, it is acknowledged that clearer signposting would be helpful in the case of heritage assets located within more open or transitional settings. In response, the supporting text will be strengthened to clarify that assessments of tall building proposals must consider views to and from heritage assets from all relevant directions, not solely a single or commonly illustrated aspect, and that the degree of protection should reflect the sensitivity and openness of the surrounding context.

	<p>mapping needs to be applied to both Elstow Abbey and the Guru Nanak Gurdwara Temple which are both at far greater risk of development impacting on them as they are in far more open settings.</p>	<p>Insert after paragraph 2.28</p> <p><i>“Tall building proposals must demonstrate that height, massing, and siting protect and, where possible, enhance heritage settings, key views and sightlines from all relevant directions, with evidence provided through robust visual impact and heritage assessments that consider the wider landscape context and longer-range views.”</i></p>
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Historic England

Topic or reference	Comment	Response
Tall Buildings Guide – Urban Area		
1 Introduction	<p>Para 1.2 is a good point that this should not be making new policy but helping to interpret LP policy.</p>	Noted and support welcomed
	<p>Para 1.4 This is helpful to clarify the purpose of the document and also to highlight that it is not promoting tall buildings.</p>	Noted and support welcomed
	<p>Paras 1.10- 1.12 This is a helpful starting point for the definition.</p>	Noted and support welcomed
	<p>Para 1.12 We note that this will be important for any large-scale proposals in the rural area.</p>	Noted and support welcomed
2 Current situation	<p>Para 2.8 We welcome the requirement for a heritage impact assessment for tall buildings within the setting of heritage assets.</p>	Noted and support welcomed
	<p>Para 2.9 We appreciate the important caveat that where tall buildings exist that are harmful to the significance of heritage assets, their replacement with another tall building is not a given.</p>	Noted and support welcomed

Appendix A

	Para 2.23 We welcome the clarification that and landmark building doesn't necessarily have to be tall.	Noted and support welcomed
Important local views and vistas	The draft SPD does not include sufficient information to identify key local views and vistas and explore their significance.	Paragraph 2.24 states that <i>"Identifying a definitive list of local views is clearly dependent on the location and scale of a proposed tall building. As such, it is not possible to produce an exhaustive list. Local views must be considered on a case-by-case basis"</i> .
	We continue to recommend that a tall buildings study/guidance should include a map of key views/viewpoints summarising these in one place. This is currently missing from the guidance.	A single mapped summary of key views and viewpoints has not been included, as visual impact is inherently site-specific and cannot be accurately captured through a fixed or definitive plan.
	In addition, it would be helpful to include photographs of key views.	Fixed photographic viewpoints within the SPD could risk oversimplifying or pre-determining visual impacts that need to be assessed on a proposal-led basis. Instead, the document includes Google image extracts to provide indicative context and assist understanding of the general locations and characteristics of key views. These are intended for illustrative purposes only. Applicants are expected to undertake proportionate, site-specific visual analysis, including verified photography and visualisations where appropriate, as part of the planning application process.
	Reference should also be made to any key views to and from the town. This should include views from the Greensand Ridge, including any designed views.	<p>The Greensand Ridge sits outside the urban area to which the SPD applies and, for the most part, lies beyond the borough boundary. However, tall buildings should nevertheless take account of the cumulative impact of development on longer-distance views across the largely flat surrounding landscape, including views from the Greensand Ridge.</p> <p>Add under paragraph 2.26: Views from other parts of the urban area and beyond are also important, particularly where they relate to identifiable historic skyline features and designated viewpoints across the predominantly flat surrounding</p>

		landscape, including locations such as the Greensand Ridge, in accordance with policy NE1 of the Bedford Borough Local Plan 2030.
Assessment criteria	We welcome criterion 4.	Support welcomed
Conclusions	Paragraph 4.5 refers to the need to evidence suitability through robust visual testing. Either in this paragraph or ideally earlier in the document, the guidance should say that Planning Applications need to be supported by LVIA, HIA, Visualisations including photomontages, wirelines etc, informed by Zone of Theoretical Visibility etc.	Amend paragraph 4.5: <i>The level of supporting information required in relation to tall building proposals will depend on site-specific circumstances and potential impacts, and no fixed list of assessments is prescribed. Where significant townscape, visual, or heritage effects may arise, applications should include proportionate supporting material, such as visual or heritage assessments and verified visual representations. Visibility assessments, including a zone of theoretical visibility, may be required to inform viewpoint selection. The scope of assessment should be agreed through early pre-application engagement and remain proportionate to the proposal</i> ”.
Appendices	Para 5.1: This should be amended from four to three urban area case studies.	Yes, amend accordingly
	Para 5.2: This should be amended from four to three urban area case studies	
	It would be helpful to include policy wording from Local Plan in an appendix.	While the suggestion to include relevant Local Plan policy wording in an appendix is noted, it is not considered necessary to amend the document in this way. The guidance draws on a wide range of existing Local Plan policies, and reproducing policy text would add length without material benefit. The SPD is intended to complement, rather than duplicate, the development plan, and users are expected to have regard to

		the full range of relevant policies when preparing or determining applications.
Design Code - Large Urban Extensions and New Settlements		
Page 2: Garden city principles	We welcome reference to the garden city principles. Whilst these principles are useful and do embody a number of modern town planning concepts, they do not address the historic environment. Therefore, in drafting your design code it is particularly important to ensure that appropriate reference is made to the need to conserve and enhance the historic environment. We therefore welcome the many references to heritage and the historic environment throughout the document.	Noted and support welcomed
Section 3: Context and character – pages 5 and 6	Page 5: We particularly welcome the focus on context and character.	Support welcomed
	Page 6: We advise that the section on heritage assets should be amended to read ‘designated and non-designated heritage sites assets and features’.	Text has been amended to refer to “ <i>Designated and non-designated heritage sites assets and features</i> ”
	You should also add reference to their settings. We recommend that you also add the following text to the section on heritage assets: For sites where there may be an impact on heritage (either on site or nearby), a heritage impact assessment/statement may be required to assess the impacts and how they can be minimised/what potential enhancements could be achieved.	Add: “ <i>Where a proposed urban extension or new settlement has the potential to affect heritage assets, either on the site itself or within the surrounding area, a heritage impact assessment may be required, consistent with policy 41S of the Local Plan 2030. This assessment will be required to:</i> <ul style="list-style-type: none"> • <i>identify the nature and extent of potential impacts on heritage assets.</i> • <i>evaluate how any harm can be avoided or minimized.</i> • <i>explore opportunities to secure benefits or enhancements to heritage assets as part of the development proposal</i>”.
	We advise that there should be more reference to local building vernacular (i.e. in terms of local building style and form, rather than just local materials) throughout the code.	Add as a sub section on built form: <i>Local vernacular and place structure</i>

		<p><i>“Urban extensions and new settlements should respond positively to local building vernacular, reflecting established patterns of built form, layout and scale across the borough. This includes the perimeter blocks, continuous building lines and strong street enclosure characteristic of Bedford and historic villages such as Bromham, Turvey and Great Barford, as well as the structured layouts of newer developments like Great Denham and Wixams. Typical local features (appropriate to the typology of the development) should inform the creation of legible streets, well-defined public spaces and coherent neighbourhoods. In urban typologies, this may include narrow plot rhythms, clear vertical proportions, articulated roofscapes and graduated height transitions. In suburban typologies, generous green infrastructure, less formal road layouts and varied housing types may be appropriate. This approach will ensure that contemporary design sits comfortably within the borough’s evolving character and sense of place.</i></p>
	<p>We welcome reference to historic field boundaries, views ridge and furrow etc.</p>	<p>Comment noted</p>
<p>Page 8: Local character</p>	<p>We welcome the section on local character. This should be expanded to include built environment and settlement grain, historical pattern of development, landscape character, designations local heritage, local views to and from the site.</p>	<p>Add to the section on local character: <i>“Local character analysis should reflect established settlement patterns and townscape, including the urban grain of Bedford town centre, the historic form of surrounding villages such as Bromham, Turvey, and Great Barford, and the transition to the wider Great Ouse landscape. Consideration should include historic development patterns, landscape character, heritage assets and locally important views, such as church spires, river corridors, farmsteads and open countryside. These factors should guide the layout, scale, and form of urban extensions and new settlements</i></p>

to ensure a positive response to context and a strong sense of place”.



Add photos of farmsteads in the local vernacular


We welcome the use of ‘must’ and ‘should’ in the draft SPD. However, these are sometimes a little buried in the narrative text. We recommend that these are perhaps marked in bold or separated out into checklists to summarise and draw out the key

The comment is noted. However, it is not proposed to highlight “must” and “should” wording through additional formatting or checklists. The guidance deliberately uses narrative text to convey requirements and recommendations in context,

	<p>requirements set out in the code. We recommend that you ensure these terms are used appropriately and consistently to convey the correct degree of requirement or recommendation throughout the document.</p>	<p>providing examples of how new development should be coded. The documents are not meant to act as a list of considerations but provide context and ensure the right questions are asked in the early stages of design and layout.</p>
<p>General</p>	<p>Section 4 appears to be missing Streets for All</p> <p>We would encourage you to reference to Streets for All in the Section 5 Movement and /or Section 7 Creating multi functional streets and spaces. Streets for All – East of England is a manual that offers guidance on the way our streets are managed. Specifically, it includes advice on traffic management, signage, lighting, ground surfaces and verges etc.</p>	<p>Section 5: Movement</p> <p>“Street layout, hierarchy and public realm design should have regard to Streets for All: East of England principles, demonstrating how movement infrastructure responds to local character and supports coherent, legible streets”.</p> <p>Section 7: Creating multifunctional streets and spaces</p> <p>“Multifunctional streets and spaces should also have regard to Sport England’s Streets for All: East of England principles, coordinating highway elements to reduce clutter, reinforce local character and support accessible, legible placemaking”.</p>
<p>Section 6 Nature and blue-green infrastructure</p>	<p>Synergies with the historic environment and conservation and enhancement of the natural environment is an important facet of sustainable development. There is an important synergy between the historic and natural environment.</p> <p>Countryside, landscape parks and the open spaces in our cities, towns and villages often have heritage interest, and we recommend to highlighting this in this section of the code. For example, green Infrastructure should not only be considered in terms of the natural environment, health and recreation but also the role it can play in conserving and enhancing the historic environment. It can be used to:</p> <ul style="list-style-type: none"> • conserve and enhance heritage assets • improve setting of heritage assets 	<p>New paragraph under heading “Network of spaces”</p> <p>“Blue-green infrastructure provision within large urban extensions and new settlements should respond positively to, and seamlessly integrate with the natural and historic environment, where possible, enhancing the setting of heritage assets and linking present historic features with wider networks such as river corridors and country parks. New provision should respond to existing historic landscapes and townscape, including river corridors, parkland and settlement patterns, and be supported through appropriate long-term management to maintain quality and distinctiveness. Examples include the restored quarry landscapes and lakes at Stewartby and Wixams,</p>

	<ul style="list-style-type: none"> • improve access to heritage assets • create a sense of place and tangible link with local history • create linkages between heritage assets and other green infrastructure <p>Likewise, the historic environment can help contribute to the quality, character and distinctiveness of green spaces by helping to create a sense of place and a tangible link with local history. Opportunities can be taken to link new GI networks into already existing green spaces in town or existing historic spaces such as church yards to improve the setting of historic buildings or historic townscape. Maintenance of GI networks and spaces should also be considered so that they continue to serve as high quality places which remain beneficial in the long term.</p> <p>We recommend that Section 6 Nature and blue-green infrastructure is strengthened by adding in reference to the linkages and synergies between green infrastructure and the historic environment.</p>	<p><i>plantation woodlands and green corridors within the Forest of Marston Vale, tributary watercourses including Elstow Brook and floodplain landscapes associated with the River Great Ouse”.</i></p>
<p>Page 21 Water management</p>	<p>Historic England welcomes the use of sustainable drainage systems in new development with the important caveat that SuDS should be designed so that they do not impact on archaeology. Impacts can be caused by draining waterlogged archaeology or introducing surplus water and pollution from surface runoff into archaeological sediments via soakaways. Consideration should be given to the most appropriate course of action to protect buried waterlogged archaeology through the design of SuDS. We therefore recommend including reference to highlight that SuDS should be designed to avoid impacts on archaeology’.</p>	<p>Amend water management paragraph on p 21:</p> <p><i>As Bedford borough is a water stressed area, new development should aim to achieve higher standards of water efficiency, in accordance with building regulations, using water efficient devices, rainwater harvesting and grey water recycling. The adopted Sustainable Drainage Systems Supplementary Planning Document provides guidance on incorporating sustainable drainage into developments to manage surface water and river flooding. Developments must be appropriately designed to both function correctly and fit with the character of the development. The most appropriate solutions will depend on various factors specific to the site and the proposed development.</i></p>

<p>Case studies</p>	<p>We welcome the use of case studies/worked examples in the design guide. We appreciate the use of illustrations, particularly those local to the area and also note the use of examples of best practice from the region including Eddington, Cambridge. We recommend including some heritage examples. This might include an example of how landscaping or set back can be used to both protect the setting of a heritage asset whilst at the same time providing open space for the development.</p>	<p>Add the case study alongside the Wootton example:</p> <p><i>“Trumpington Meadows, Cambridge is a landscape-led urban extension showing how green buffers, meadowland, and building setbacks can protect historic settlement patterns and landscape features while delivering high-quality development, with river corridors seamlessly integrating new homes into the surrounding countryside”.</i></p> <p><i>“The incorporation of river corridors and accessible open spaces forms a robust green infrastructure network that links new neighborhoods to the surrounding countryside, promoting biodiversity, recreation, and a strong sense of place”.</i></p> <p>https://hdawards.org/scheme/trumpington-meadows</p> <p>Add a photo:</p>
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	<p>Finally we recommend that more focus is given in the code to ensure that each new settlement or urban extension harnesses the power of heritage to inform sensitive design and positive placemaking, grounded in the local context and creating an important, distinct sense of place.</p>	<p>Noted -add the following paragraph at the end of chapter 2:</p> <p><i>The code does not seek to promote a particular approach but to demonstrate the scope of the considerations needed. Context is key and each development will need to identify the key areas and issues that need addressing in any new development.</i></p>
<p>Design code - urban and suburban areas</p>		
<p>Page 10</p>	<p>We welcome the many references to heritage and the historic environment throughout the document. We particularly welcome the contextual approach to site analysis on page 10.</p>	<p>Noted and support welcomed</p>

	<p>We advise that the section on heritage assets on page 10 should be expanded to specifically reference designated and non-designated heritage assets and their settings.</p>	<p>Add to page 10: <i>“For sites where a development has the potential to affect heritage assets, either on the site itself or within the surrounding area, a heritage impact assessment may be required under policy 41S of the Local Plan 2030. The assessment should identify impacts, demonstrate harm avoidance or minimisation, and secure opportunities to deliver heritage benefits or enhancement”.</i></p>
	<p>We recommend that you also add the following text to the section on heritage assets: We advise that there should be more reference to local building vernacular (i.e. in terms of local building style and form, rather than just local materials) throughout the Code.</p>	<p>Replace: <i>“Development should take account of heritage assets on or near the site, as defined in the National Planning Policy Framework, recognising that local character derives from the cumulative evolution of buildings, spaces, scale, form, grain and their relationship to streets and landscapes. In Bedford, this is reflected in established building traditions, historic street patterns, building heights, materials and architectural forms (including terraces, detached villas, riverside warehouses and civic buildings, often articulated through pitched roofs, articulated façades, vertical window proportions and strong street enclosure) that together create a coherent and legible townscape. Proposals should treat historic character as an opportunity, drawing on local scale, form, layout, materials and detailing to reinforce local distinctiveness and contribute positively to the ongoing evolution of the area”.</i></p>
<p>Page 11: Local character</p>	<p>We welcome the section on local character. The helpfully includes factors such as era of development, streetscape, street layout, green infrastructure and building heights.</p>	<p>Support welcomed</p>

Appendix A

	<p>We recommend that you also add the following factors: built environment and settlement grain, historical pattern of development, landscape character, designations local heritage, local views to and from the site.</p>	<p>Replace with: <i>“The Bedford Borough Design Guide analyses the character of the borough’s urban and suburban areas, identifying how built form, settlement grain, landscape and heritage shape local distinctiveness.</i></p> <p><i>Within each local distinctiveness area, a representative street has been analysed to identify prevailing characteristics such as scale, massing, enclosure, rhythm and relationships with surrounding spaces and views, which underpin the 16 design principles set out in the guide.</i></p> <p><i>The guide also provides a structured process to analyse local context -considering townscape, landscape, heritage and key views - to ensure new development responds positively to its setting and reinforces local distinctiveness”.</i></p>
<p>General comments</p>	<p>We welcome the use of ‘must’ and ‘should’ in the draft SPD.</p>	<p>Support welcomed</p>
	<p>We recommend that you ensure these terms are used appropriately and consistently to convey the correct degree of requirement or recommendation throughout the document.</p>	<p>No change. The draft SPD already applies the terms “must” and “should” in a clear and consistent manner, reflecting established planning practice and the intended distinction between mandatory requirements and advisory guidance.</p>
	<p>We would encourage you to reference to Streets for All - East of England in the following sections</p> <p>2.4: Movement 2.6: Public space.</p>	<p>2.4: Movement</p> <p><i>The best examples of street networks in Bedford reflect principles set out in Streets for All – East of England, demonstrate-demonstrating a clear and legible hierarchy of with primary, secondary and tertiary routes that support accessibility, legibility and a strong sense of place.</i></p> <p>2.6: Public space.</p>

		<p>i) Streets</p> <p><i>The design of streets should be based on their role place in the street hierarchy and their surrounding context, in line with the principles set out in Sport England’s Streets for All – East of England. Analysis of the area will show how the street network is set out and how they interact with the buildings, spaces and uses around them.</i></p>
	<p>Natural environment and synergies with the historic environment. Conservation and enhancement of the natural environment is an important facet of sustainable development. There is an important synergy between the historic and natural environment. Countryside, landscape parks and the open spaces in our cities, towns and villages often have heritage interest, and we recommend to highlighting this in this section of the code. For example, Green Infrastructure should not only be considered in terms of the natural environment, health and recreation but also the role it can play in conserving and enhancing the historic environment. It can be used to:</p> <ul style="list-style-type: none"> • conserve and enhance heritage assets • improve setting of heritage assets • improve access to heritage assets • create a sense of place and tangible link with local history • create linkages between heritage assets and other green infrastructure <p>Likewise, the historic environment can help contribute to the quality, character and distinctiveness of green spaces by helping to create a sense of place and a tangible link with local history. Opportunities can be taken to link new GI networks into already existing green spaces in town or existing historic spaces such as church yards to improve the setting of historic buildings or historic townscape.</p>	<p><i>Add to introductory paragraph in section 2.5:</i></p> <p><i>Bedford has a wealth of natural assets including country parks, local nature reserves, sites of special scientific interest and local green spaces. It has large areas of countryside as well as the River Great Ouse and other waterways. Historic landscapes, parks and churchyards can form integral elements of green infrastructure networks.</i></p>

	<p>Maintenance of GI networks and spaces should also be considered so that they continue to serve as high quality places which remain beneficial in the long term. We recommend that section 2.5 Nature is strengthened by adding in reference to the linkages and synergies between green infrastructure and the historic environment.</p>	
	<p>Historic England welcomes the use of Sustainable Drainage Systems SuDs in new development with the important caveat that SuDS should be designed so that they do not impact on archaeology. Impacts can be caused by draining waterlogged archaeology or introducing surplus water and pollution from surface runoff into archaeological sediments via soakaways. Consideration should be given to the most appropriate course of action to protect buried waterlogged archaeology through the design of SuDS. We therefore recommend including reference in the SuDS section on page 29 to highlight that SuDs should be designed to avoid impacts on archaeology’.</p>	<p>Page 29: The adopted Sustainable Drainage Systems SPD provides guidance on incorporating sustainable drainage into developments to manage surface water and river flooding. Developments must be appropriately designed to both function correctly and fit with the character of the development. The most appropriate solutions will depend on various factors specific to the site and the proposed development <i>such as ground conditions, site layout, the presence of archaeological remains or areas of potential archaeological interest. Appropriate early assessments will need to be prepared to ensure suitable placement and potential mitigation of sustainable drainage locations.</i></p>

	<p>We welcome the use of case studies/worked examples in the design guide. We appreciate the use of illustrations, particularly those local to the area. We recommend including some heritage examples. This might include an example of how landscaping or set back can be used to both protect the setting of a heritage asset whilst at the same time providing open space for the development.</p>	<p>2.6 Public space</p> <p>Add the following words:</p> <p><i>A strong public-realm approach, rooted in heritage, design quality and accessible civic space, should underpin the redevelopment in sensitive historic settings. For example, redevelopment around Lincoln Castle, Cathedral views and historic wharves uses building set-backs and waterside public space to protect key vistas while delivering mixed-use development. Open space along the waterfront reinforces the historic relationship between the city, water and industry, similar in character to opportunities along the River Great Ouse</i></p>
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Kempston Town Council’s Planning Committee

Topic or reference	Comment	Topic or reference
All	<p>We welcome the opportunity to comment on the three draft Supplementary Planning Documents currently out for consultation. The committee commends the significant amount of work that has clearly gone into preparing these documents. They provide a</p>	Noted – no change

	<p>well-structured and comprehensive framework, setting out high-level principles that will help guide future development across the borough. The emphasis on design quality, placemaking, and coherent urban form is particularly valued, and the clarity of the guidance will support both applicants and decision-makers in achieving consistent and well-considered outcomes. We appreciate the thoughtful approach taken in developing these documents and look forward to seeing how they will shape future planning and development within Bedford and Kempston.</p>	
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Liberal Democrats

Topic or reference	Comment	Response
<p>General</p>	<p>Some links do not open e.g. Page 4 of the Tall Buildings - the policies map : https://edrms.bedford.gov.uk/OpenDocument.aspx?id=vISwaox7XReaXogfVY6q5A%3d%3d&name=Tall%20Buildings%20Guide%20Urban%20Area%20SPD%20-%20final%20for%20consultation%20March%202026.pdf</p>	<p>Amend. The correct links will be added to the document.</p>
<p>Consultation</p>	<p>Consultation dates are not clear. The website says: "The consultation will run from 6 March 2026 to 17 April 2026." The Council's email has a different end date, and the documents themselves had a third set of dates... There is a risk that this becomes challengeable and this needs to be addressed in the consultation response.</p>	<p>Four weeks is the statutory consultation period applicable to Supplementary Planning Documents and also the time period as set out in the Statement of Community Involvement. The consultation period was extended a further two weeks, closing on 17 April enabling additional engagement to take place. However, it is acknowledged that inconsistent dates appeared across the website, email communications and some consultation documents. This lack of clarity is regrettable, and it was an oversight that consultees were not made aware of the additional consultation period.</p>

Appendix A

	There is some misnumbering in reports.	The documents will be reviewed to ensure numbering is correct prior to finalisation.
	LDA 3GU is an area designation in the Design Guide: https://edrms.bedford.gov.uk/OpenDocument.aspx?id=8Y1bAmK01b3mFv%2bioP%2bEaA%3d%3d&name=Bedford%20Borough%20Design%20Guide%20reduced%20size.pdf but isn't clearly explained in the document.	No change is proposed in response to this comment. DA 3GU is an area designation defined within the adopted Bedford Borough Design Guide, and the design code sits alongside this document rather than duplicating or re-explaining existing classifications. The design codes and the tall buildings guide should be read alongside the design guide for the detailed explanation of area designations and their characteristics.
	It should be explicit that the Design Guide principles override any exemptions that are implied in these subsequent Design Codes.	No change is proposed. The Bedford Borough Design Guide and the subsequent design codes are Supplementary Planning Documents that are intended to operate in a complementary and consistent manner. The design codes do not create exemptions from the Bedford Borough Design Guide, nor do they override its principles; both SPDs should be read together and applied alongside the Local Plan as part of the overall design framework.
Urban and suburban areas design code		
Page 6	Page 6 is inaccurate as a depiction of what is going on. There are three sub-design codes being developed within the Design Guide created in 2023. These all "sit within the same design framework". There already is a design guide, and these SPDs provide helpful additional guidance.	No change is proposed. The Bedford Borough Design Guide and the subsequent design codes are Supplementary Planning Documents that are intended to operate in a complementary and consistent manner. And should be read together and applied alongside the Local Plan as part of the overall design framework.
Pages 7 and 8	P7 and P8 in the pink box it says that orange is 18 th century development. This is not the case.	Amend: Orange (<i>nineteenth</i> century): Urban neighbourhood typology
Page 7	Urban areas are not predominately 19 th century.	The colour coding is intended to broadly indicate the predominant period of development within each area. It should be noted that none of the areas are exclusively

		<p>defined by development from a single era. As noted above the text box, these local distinctiveness areas are taken from the Bedford Borough Design Guide</p> <p>Replace wording in the text box as follows:</p> <p><i>Light blue denotes the town centre and conservation area, which contains development from multiple periods.</i></p> <p><i>Orange denotes areas where nineteenth and early twentieth century development is a significant characteristic.</i></p> <p><i>Yellow denotes areas of primarily mid to late twentieth century development</i></p>
<p>4) p19</p>	<p>The photo on the right (Brickhill) is given as an area which is less permeable – but only for drivers. It is highly permeable for active travel, and is a useful road hierarchy in action for motor vehicles. Personal safety is not enhanced by unlit paths and cycle paths out of sight of roads and dwellings, often hidden by greenery.</p>	<p>Noted. Amend descriptions of photos to read:</p> <p><i>More permeable road network: a connected network of Bedford streets</i></p> <p><i>Less permeable road network: a predominance of cul-de-sacs in Bedford</i></p>
<p>5) p23</p>	<p>We need separation of bicycles and pedestrians. Currently cars/vans/lorries dominate the roads, and cyclists dominate the pavements, meaning that pedestrians lose out.</p>	<p>Noted. The National Model Design Code states that cycles should be separated from vehicles where possible (graphic from this code is reproduced on page 23).</p>
<p>6) p29</p>	<p>Can BBC make SUDs a requirement?</p>	<p>Noted – sustainable urban drainage is a Local Plan policy requirement. There is also an adopted supplementary planning document setting out how sustainable urban drainage systems should be considered in development.</p>

7)	Public amenity green space (urban or rural) must be protected and highlight similarities in developments in urban and rural areas [e.g. p28]. Green spaces also function as meeting places [e.g. Bowhill in Putnoe, p 39].	Noted
Page 44 & section 3.0	Referring to all orange-shaded areas as 'urban' seems simplistic. The orange-shaded areas in Goldington, Riverfield, some of Castle-Newnham and Queens Park have more in common with the yellow suburban areas – this allocation should be reviewed. Also, these areas listed are not 18 th century. These areas listed are not addressed in section 3, further emphasising that they have been mis-classified.	Noted – the text box on page 7 will be amended to reflect this Noted. The local distinctiveness areas shown on the map demonstrate areas of broad similarity in characteristics, categorised largely by the period of development (the text box stating orange areas are largely eighteenth century will be amended to largely nineteenth century). They are not allocations or policy designations, but a guide to predominant development features that can form part of a design code. The map is taken from the Bedford Borough Design Guide 2023. The design codes are not intended to review or revise these distinctiveness areas, but to present a consistent point of reference with the design guide. Any new development is encouraged throughout the code to take account of its immediate surroundings and characteristics in the early stages of design process.
Page 51 -	Ground floor should explicitly mention the protection of active frontage where possible.	Agreed. Amend paragraph on ground floor (page 51) to include: <i>Active frontages should be maintained where possible, especially in the primary shopping area and, where possible, along other key streets in the town centre</i>
Page 73:	This line: "especially in deprived wards such as Cauldwell, Castle, Goldington and Harpur" needs to reference Greyfriars, Kingsbrook and Queen's Park as well. And in subsequent sections (e.g. p83).	Amend:

Appendix A

		<i>Public space: New developments should prioritise the provision of accessible open space (especially in deprived wards such as Cauldwell, Castle, Goldington, Harpur, Greyfriars, Kingsbrook and Queen's Park to address deficiencies.</i>
	Additionally, small public spaces such as seating (benches) have been traditionally removed, as they can be a focus for anti-social behaviour.	Noted
Page 77	There is reference to 'a church', in Putnoe, but there is more than one.	<i>Amend: The neighbourhood is punctuated with generous green areas, schools, shopping parades and other amenities like bus stops, cafes, a library and churches.</i>
Page 78	Regarding parking, 'As car ownership increased, many of these front areas were converted into driveways, resulting in limited on-street parking across much of the area' fails to take acknowledge that there are many streets that were not designed for the current level of car ownership and on-street parking becomes congested. This should be acknowledged in p78. Off road parking in some of these areas (e.g. Harvey Road) is a problem as the front gardens are not long enough. Lack of parking, whether on-road or off- road, leads to parking on verges, which ruins the verges and the streetscape.	Noted. On page78, amend first bullet point in the section on challenges created to read: <i>Loss of front gardens to parking and in some scenarios with increased car ownership leading to parking congestion on streets not designed to accommodate current demand. In some cases, limited off-street provision in areas such as Harvey Road has forced vehicles onto verges and footways, harming street quality and safety.</i>
Page 80	Gostwick Road is in Cauldwell Ward, not Kempston as stated.	Amend page80 photo description to read: Gostwick Road, Bedford
	Boundary treatment – in reality, boundary treatment should allow for off-road parking, not 2m of planting.	It is noted in the text that the boundary treatments form an important part of how the private and public realms interact and that the treatments listed should be considered. There may be several options in considering parking in new developments that do not rely on it being a feature of boundary treatments.

<p>Page 88</p>	<p>Housing density: Opportunities to introduce higher densities in suburban areas "provided they do not compromise the character and identity of the neighbourhood" or "risk creating harm to neighbouring residents." This 'harm' needs to be recognised as insufficient parking and damage to the street scene. The suburban area's success can partially be measured by its density, and introducing higher densities may be harmful.</p>	<p><i>On page 88, the housing density paragraph will be amended to read:</i></p> <p><i>Generally, suburban development is lower density than urban or town centre development, However, there may be opportunities to introduce higher densities in suburban areas provided they do not compromise the character and identity of the neighbourhood or risk creating harm to neighbouring residents such as damage to the streetscene, loss of landscape features, increased parking pressure, reduced visual coherence, overlooking and loss of daylight.</i></p>
<p>Page 80</p>	<p>Regarding Putnoe, "New development will be predominantly two and three storey terraced houses" – new builds being terraced will be out of keeping with much of the current housing.</p>	<p>Noted. Terraced dwellings are present throughout Putnoe, however a mix of housing types will provide appropriate development and opportunity.</p> <p>Remove word 'terraced' from first paragraph on page 81.</p>
	<p>Examples used as illustration and then to develop principles do not apply across whole areas identified; this risks inconsistency with the design guide. Distinctiveness could be lost by applying case studies to the whole area leading to errors.</p>	<p>Noted. Examples and illustrations are used to demonstrate how characteristics and features can be identified when planning new development. They are not meant as a template to guide all new proposed development..</p>
<p>Large Urban Extensions and New Settlements Design Code</p>		
	<p>There should be a significant consideration of protecting green space, ensuring transport links are prepared in advance and well lit. Cycle paths need to be clearly marked and maintainable. They should not function as additional parking for domestic or commercial vehicles.</p>	<p>Amend the paragraph about legibility on page 10 to read:</p> <p><i>Any new settlement or urban extension should be clearly legible, allowing residents, workers and visitors to move around with confidence. Clearly marked pathways and sustainable travel routes (protected from use as additional parking), street</i></p>

		<i>hierarchy and landmark features will assist in orientation and help people understand their location within the settlement.</i>
	Whilst it may fall out of the purview of a planning department, marketing materials should reflect planning applications and approvals and not mislead residents. In some development in Bedford Borough, marketing materials showing housing where eventually business units were built is a source of ongoing lack of confidence in planning functions.	Noted. This is not within the scope of these documents.
Page 2	Under ‘Nurtured’ – ‘Community ownership of land and long-term stewardship of assets’ could mean the Borough Council, not Open Space Management companies.	This graphic is reproduced from the TCPA website. It is not within the scope of this document to amend it.
Pages 5, 13 and 20	Personal safety – personal safety is not enhanced by unlit paths and cycle paths out of sight of roads and dwellings, often hidden by greenery.	Noted
Page 9	"Active travel links connect the local centre with residential areas and local and strategic open space." Should also recognise connections to employment sites and the town centres and other travel links. Additionally, safe cycle storage must be provided.	Amend numeral 2 in image description to read: <i>Active travel links should connect the local centre with residential areas, employment sites, town centres, local and strategic open space, and wider transport networks. Safe and secure cycle storage should also be provided</i> "
Page 20	6) Again, whilst not falling within the purview of planning, we should explicitly oppose management charges.	This is not within the scope of these documents.
	7) p21 Is SUDS required?	Amend paragraph on page 21 to read: <i>As Bedford borough is a water stressed area, new development should aim to achieve higher standards of water efficiency, in accordance with building regulations, using water efficient devices, rainwater harvesting and grey water recycling. The adopted</i>

		<p><i>Sustainable Drainage Systems SPD provides guidance on incorporating sustainable drainage into developments to manage surface water and river flooding. Developments must be appropriately designed to both function correctly and fit with the character of the development. The most appropriate solutions will depend on various factors specific to the site and the proposed development.</i></p>
	<p>8) p23 'New settlements should incorporate various meeting places...'In new developments such as Wixams, village and community hall space has been lacking, stifling growth of community groups, youth pursuits and religious/cultural activities. Whilst school gyms are available for hire, they never have space allocated for storage by outside hirers, and valuable specialist equipment needs to be transported around by car instead.</p>	<p>Noted. Amend paragraph under heading 'Meeting Places' on page 23 to read:</p> <p><i>New settlements should incorporate a range of meeting places to facilitate both formal and informal gatherings and social interactions. These should include built facilities such as village or community halls, gyms and cafes/restaurants capable of supporting community groups, youth activities and religious or cultural uses. Formally planned play areas, greens and parks should serve as destinations that promote social cohesion and healthy lifestyle activities. Informal meeting points such as green spaces in street scenes or 'nexus' points where multiple routes intersect can strengthen community cohesion, provide active surveillance and aid wayfinding.</i></p>
<p>Page 25</p>	<p>In new developments such as Wootton, the dwellings may be built so that they can be signed off as net zero, but the air tightness and isolation balance mean that many residents have installed air conditioning to cool their homes.</p>	<p>Noted.</p>

	Bus and public transport connectivity should be considered in all developments. This also includes frequent and reliable connections to other employment sites in the BLMK area, such as Milton Keynes and Luton.	Noted. Page 13 contains commentary on public transport. Amend page 13 to read: <i>Streets should be designed to support and encourage the use of public transport. The layout of the street network must consider appropriate distances to bus stops, bus routes (both within the borough and to other key centres in the wider region) and rail stations, creating a coherent and circuitous movement pattern that radiates from key transport hubs. Bus stops should be near direct and reliable active travel routes.</i>
Tall Buildings Guide - Bedford Urban Area		
Page 15	Problems of overlooking and inappropriate window siting must be avoided.	Noted
p19, 3.28, criterion 3	There should be some threshold for requiring an assessment (probably numerical/appropriate) of the impacts of the building, in combination with the surrounding structures, channelling the wind and increasing turbulence.	Noted and this can be investigated through the new Local Plan
	Agree with the examples given in Appendix 2, and particularly in the case of Greyfriars, have serious concerns about "high-rise slums" with some developers trying to build flats with light-wells where bathrooms are overlooking and overlooked by bedrooms and social spaces.	Noted

Natural England

Topic or reference	Comment	Response
	While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment. We therefore do not wish to provide specific comments.	Support welcomed

Appendix A

<p>Green infrastructure</p>	<p>This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with the National Planning Policy Framework and any GI strategy covering your area. Natural England’s Green Infrastructure Framework provides evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI). Development should be designed to meet the 15 Green Infrastructure Principles. The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan.</p> <p>GI mapping resources are available here and here. These can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.</p> <p>Further information is set out in the Planning Practice Guidance on Green Infrastructure.</p>	<p>Noted. These documents make reference to the need to consider green infrastructure as part of any early design code process. The Design Code - Urban Area contains section relating to nature and green infrastructure and the Design Code - Large Urban Extensions and New Settlements contains a section on nature and blue-green infrastructure.</p>
	<p>Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement.</p> <p>Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities.</p>	<p>Noted.</p>

	<p>There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p> <ul style="list-style-type: none"> • green roof systems and roof gardens; • green walls to provide insulation or shading and cooling; • new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). <p>You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.</p>	<p>Page19 of the Large Urban Extensions and New Settlements Design Code references green technologies and techniques.</p>
<p>Biodiversity enhancement</p>	<p>Housing development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Major development must deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement is due to be extended to smaller scale development in spring 2024.</p> <p>Further information on biodiversity net gain, including planning practice guidance, can be found here. Local Nature Recovery Strategies will also set out biodiversity opportunities.</p>	<p>The design codes both contain information on the requirement for biodiversity net gain.</p>
<p>Local Nature Recovery Strategies</p>	<p>The SPD may provide opportunities to enhance the biodiversity value of urban spaces through the use of native species in planting and where possible allowing natural recruitment of plants from the site native soil seedbank and natural colonisation; this fosters native genetic diversity, generates authentic communities and avoids biosecurity issues. The Local Nature Recovery Strategy should be consulted for local species recommendations and Priorities and Measures relevant to the urban environment.</p>	<p>Noted. These documents provide information on green spaces and infrastructure. Site specific considerations such as planting schemes would be addressed in site specific codes.</p>

Appendix A

	<p>Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188, 192 and 193).</p> <p>Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.</p> <p>Natural England’s Environmental Benefits from Nature Tool may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. There is further information in Planning Practice Guidance for the natural environment.</p>	
Protected species	<p>Natural England has produced Standing Advice to help local planning authorities assess the impact of particular developments on protected or priority species.</p>	Noted
Landscape enhancement	<p>The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature.</p> <p>Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.</p> <p>For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for</p>	<p>Noted</p> <p>These documents provide information on green spaces and infrastructure. Site specific considerations such as planting schemes would be addressed in site specific codes.</p>

Appendix A

	<p>succession planting so that new trees will be well established by the time mature trees die.</p> <p>Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 places a duty on planning authorities to seek to further the statutory purposes of protected landscapes.</p> <p>Landscape Character Assessments and National Park and AONB Management Plans may set out relevant enhancement measures.</p>	
Other design considerations	The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (paragraph 191). The National Design Guide and National Model Design Code set out further detail on designing for nature.	Noted. These documents should be read alongside national guidance.
Strategic Environmental Assessment/Habitats Regulations Assessment	A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.	Noted. Natural England were consulted on the scoping and sustainability appraisal screening and responded with no specific comments.

National Highways

Topic or reference	Comment	Response
	After reviewing the documents, National Highways are supportive of the focus on sustainable and active travel guidance can confirm we have no further comments to make.	Support welcomed.

Resident

Topic or reference	Comment	Response

Appendix A

	<p>Do these statements on the urban suburban design impact on the countryside? Most villages have a NDP setting out sense of place and a possible design guide. Have you done a countryside landscape review over the rural area or you taken the landscape review under the 2030 plan? Oakley NDP predicted on the landscape Plan and design features and a sense of place.</p>	<p>Preparation of the Local Plan 2050 has commenced. Until adoption, the Bedford Borough Landscape Character Assessment (2020) remains the current evidence base informing plan making and design guidance. The Design Code - Urban and Suburban Areas will provide guidance for development within the urban area as shown on the Policies Map. The Design Code - Large Urban Extensions and New Settlements will provide guidance on any larger new developments across the borough, alongside relevant rural evidence and guidance. These documents are supplementary planning documents that do not introduce new policy, but support policies adopted in the borough's development plan. . Neighbourhood Plans form part of the development plan.</p> <p>Countryside design and landscape matters continue to be guided through the Landscape Character Assessment, Local Plan policies and adopted Neighbourhood Plans until review through the Bedford Borough Local Plan 2050.</p>
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Renhold Parish Council

Topic or reference	Comment	Response
Consultation accessibility	The purpose of the consultation is for the local authority to better understand if these policies meet the needs of the borough, with one of the following objective of the consultation set out below: Do they suitably support the design policies in	Four weeks is the statutory consultation period applicable to Supplementary Planning Documents and also the time period as set out in the Statement of Community Involvement. The consultation period was

Appendix A

	<p>the development plan (Local Plan 2030 policies 28S to 30)? On clicking on the link on the consultation email there is an error message when trying to reach the page, it displays as: In addition, there are conflicting dates as to when this consultation closes, the consultation notification email states This consultation will run until 5pm on 3 April 2026. The Borough Council webpage Design Codes and Tall Buildings consultation Bedford Borough Council states: The actual Design Codes and Tall Buildings consultation document states closure information as: Having three very different consultation end dates is confusing, even more so given this consultation was relatively short, being only around 4 weeks, which means effective engagement for Parish Councils as the first tier of local government have been limited with being able to fully reflect and consider these important consultation documents.</p>	<p>extended a further two weeks, closing on 17 April enabling additional engagement to take place. However, it is acknowledged that inconsistent dates appeared across the website, email communications and some consultation documents. This lack of clarity is regrettable, and it was an oversight that consultees were not made aware of the additional consultation period.</p>
	<p>As a rural village community, Renhold Parish Council, are mindful that they are not part of the urban area, so have assumed as a rural parish this planning policy document does not apply to Renhold and its residents. However, on review of the document, there are illustrative maps on Pages 76, 86, and 101 of this document, which are very challenging to read accurately. Having tried various different methods and techniques to enlarge the map presented, to try and identify the areas within the purple colour coding, located in the north east part of the diagram, it has been impossible to determine where this area is in relation to Renhold and the Renhold parish boundary. The area is highlighted in red below: Renhold Parish Council would like to make it absolutely clear that no part of Renhold parish, so any area north of the brook that runs along Norse Road, is to be considered as urban. It is part of Renhold a rural village, and not to be inferred in any way to be part of the urban or suburban area in any way whatsoever. Given the maps</p>	<p>The illustrative maps within the design code do not define settlement status, alter parish boundaries, or imply that any part of Renhold parish is urban or suburban. Renhold remains recognised as a rural village and this position is unchanged.</p> <p>Comments regarding the legibility of maps on pages 76, 86, and 101 are noted. The document will be amended to clarify that the mapping is indicative only and does not confer urban or suburban designation.</p> <p>The Landscape Character Assessment remains the adopted evidence base supporting the current adopted Bedford Borough Local Plan and was not subject to consultation within this exercise. Engagement on landscape and growth matters affecting rural parishes</p>

Appendix A

	<p>are not clear or legible, if any part of Renhold parish has been included in any mapping that is coloured yellow or purple, the policy document MUST be amended to ensure the maps truly reflect that Renhold is a rural community. Large Urban Extensions and New Settlements Design Code policy comments The document for Large Urban Extensions and New Settlements Design Codes references the policy Landscape Character Assessment for the rural area on page 3, it reads that this assessment document sits alongside the LUE and NS policy, however there is no link to the Character Assessment document to view this document, so the two can be reviewed in parallel. Renhold Parish Council as a rural parish, that has historically like many villages, attracted a number of proposed areas as part of the Local Plan Call for Sites process, would have welcomed an opportunity at this stage of the emerging new Local Plan to have input to help shape both the Large Urban Extensions and New Settlements Design Codes and Landscape Character Assessment, so feel it is a missed opportunity for the Landscape Character Assessment policy document not to have been consulted on at this time.</p>	<p>will take place through future Local Plan consultation stages.</p> <p>These documents are meant to provide additional guidance on the application of policies found in the adopted development plan, particularly those relating to design. They set out the considerations expected to be made where new development has been proposed.</p>
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Resident

Topic or reference	Comment	Response
Design codes	<p>Design Codes based on TVA should be utilised in preference to Design Guides.</p> <p>LAs should establish recurring partnerships with key Consultation Bodies, such as Create Streets and The King's Foundation, etc who specialise in getting through to a huge swathe of grassroots members of the public with tried and</p>	<p>The points raised are acknowledged. These matters are more appropriately considered through heritage strategies, conservation area appraisals and management plans, townscape improvement schemes, or other place-specific initiatives, rather than through plan-making policy or the design code.</p>

Appendix A

	<p>tested previous experience in Local Plans, such as Lichfield, etc.</p> <p>Non-demolition of historic buildings prior to the 1950s must be made policy or adhered to as part of LCC's commitment to combatting the Climate Crisis through sequestering carbon in its Old Builds.</p>	<p>The council frequently works with various external organisations across an array of subject matters.</p>
<p>SECTION 1:</p>	<p>LAs should adopt a Local List of Valued Buildings (Non-designated Heritage Assets), which have been a government requirement since the policy introduction through the NPPF in 2012.</p> <p>Historic England produced a guide to help Councils in May 2012. Bristol produced an exemplar list in 2015, which is well worth reviewing.</p>	<p>Noted. This is not within the scope of these documents.</p>
	<p>Option for people to provide feedback even if out of time for additional documents, such as SPDs or at the discretion of Councils where feedback may be particularly assistive or lead to additional academic and architect guidance. Option for public publishing of feedback should be encouraged with the consultee's consent to encourage wider consultation uptake moving forwards.</p>	<p>Four weeks is the statutory consultation period applicable to Supplementary Planning Documents and also the time period as set out in the Statement of Community Involvement. The consultation period was extended a further two weeks, closing on 17 April enabling additional engagement to take place. However, it is acknowledged that inconsistent dates appeared across the website, email communications and some consultation documents. This lack of clarity is regrettable, and it was an oversight that consultees were not made aware of the additional consultation period.</p>

Appendix A

	<p>Existing Action Plan if present for Designated and Non-designated Heritage Assets needs identifying and/ or establishing (I may support this if invited).</p>	<p>These matters are more appropriately considered through heritage strategies, conservation area appraisals and management plans, townscape improvement schemes, or other place-specific initiatives, rather than through plan-making policy or the design code.</p>
	<p>Era-style buildings, especially rows of Georgian, Victorian and Edwardian architecture must be faithfully restored, retained and recreated to complement surrounding historic streets that may or may not be classed in official Conservation Areas preventing harsh contrast with newer built housing estates from the 1950s onwards. Where demolition is proposed for 1950s style housing onwards- any new construction must be in the historic building style and local materials to ensure high carbon capacity, quality aesthetic and true blending of the interconnected conurbations of any one area, place or location.</p>	<p>These matters are more appropriately considered through heritage strategies, conservation area appraisals and management plans, townscape improvement schemes, or other place-specific initiatives, rather than through plan-making policy or the design code.</p> <p>These documents are meant to provide additional guidance on the application of policies found in the adopted development plan, particularly those relating to design. They set out the considerations expected to be made where new development has been proposed. They are not meant as a prescriptive tool for design, but to encourage analysis of the character and context of areas where new development is proposed.</p>
	<p>Concerted efforts to identify and locate core suppliers for raw materials and specific heritage skills should encourage new uptake of these limited artisan craft skills by new contractors locally based to support the local economy, provide employment, and reduce the cost of product and service in the long-term. Volunteer labouring assemblies should be fully encouraged and supported identifying key individual an group</p>	<p>Identifying and locating of materials and skills are beyond the scope of these documents.</p>

Appendix A

	<p>skillsets that can be utilised to protect historic buildings or areas at risk with a view to supporting the construction of new authentic style housing (as and where appropriate) and the reconstruction of demolished prized old buildings beloved by the community, such as community pubs, libraries and community centres.</p>	
	<p>Simplified streamlined Planning Process for key stakeholders either working to authentically restore buildings and/ or build new ones, such as observed with many civic buildings in Budapest Hungary and the Federal University Buildings in the US.</p>	<p>The process of applying for planning permission is set out in national legislation and regulations and beyond the scope of these documents.</p>
	<p>Where there have been evolving building styles over years, eg. Combination of one or more: Georgian, Edwardian and Victorian, the style that best promotes the area, ie. One that has the majority era structures left or capacity size requirements as examples should be utilised by house builders, especially where a streetscape may have been annihilated during the World Wars.</p>	<p>These documents set out the considerations expected to be made where new development has been proposed. They are not meant as a prescriptive tool for design, but to encourage analysis of the character and context of areas where new development is proposed.</p>
<p>SECTION 2: Designated & non-designated heritage assets</p>	<p>Enhancement of Historic Areas to remove modern street furniture with the integration of classical style timepieces should be encouraged and pursued wherever possible with clear preferred guides set out for each part of the city.</p>	<p>These documents set out the considerations expected to be made where new development has been proposed. They are not meant as a prescriptive tool for design, but to encourage analysis of the character and context of areas where new development is proposed.</p>
	<p>Enhancement of Setting with funding grants and financial incentives from all tiers of Government for Private Investors especially those contributing actively towards achieving Net Zero through Embodied Energy/ Carbon Capacity rich measures, i.e. Retention of Old Builds.</p>	<p>Grants and financial matters are beyond the scope of these documents.</p>
	<p>Archive Pooling of invaluable source material, such as Historic Photographs, Oil Paintings, such as “Memory Lane” featured on InYourArea Magazine to enrich existing material archives.</p>	<p>Archiving materials related to the historic environment is beyond the scope of these documents.</p>

Appendix A

	<p>New officialising of Non-Designated Heritage Assets must be actively supported even if informed by the (wider) community thereby providing some possibility of removing these from risk of demolition.</p>	<p>The designation of heritage assets is beyond the scope of these documents.</p>
	<p>Incentives must be provided to those dependable sincere third party investors that take on, maintain and protect said sites against their annihilation from the streetscape with rescue-packages actively promoted and supported once again with a trusted Directory creating goodwill amongst the local community.</p>	<p>Grants and financial matters are beyond the scope of these documents.</p>
	<p>Opportunity to meet or correspond on Zoom Conference Call regarding key areas, buildings and places at risk where key stakeholders, such as property owners may be better placed to engage in positive and constructive discussion through third parties, such as myself and a trusted panel of experts in their fields and sectors who could enable these people and organisations to maximise their civic heritage, whilst proactively striving to protect more historic buildings from decline and/ or demolition where a strategy package for raising the revenue to do this could be arranged and facilitated.</p>	<p>These documents relate to design considerations for new development. The opportunity to comment on specific proposals or proposals for specific areas are more appropriately made through the preparation of a local plan or a planning application.</p>
	<p>Defining Character Areas- zoning symmetrical parallel construction recommended where distinctive individualised properties remain as checked against authentic archive blueprints. This will ensure high-quality housing for everyone reducing the Page 10 of 18 societal divides between misperceived “good areas” where affluent people reside in historical style properties and less advantaged reside in contemporary ones</p>	<p>The Local Distinctiveness Areas are taken from the Bedford Borough Design Guide: Settlements and Streets, adopted in 2023. It is not within the scope of these documents to amend them.</p>
	<p>Industry should be conserved at former industrial complexes, such as Economic Docks with equivalent sites offering modern-day uses, alongside traditional uses such as export and import</p>	<p>‘Zoning’ areas for particular types of development is not withing the scope of these documents.</p>

Appendix A

	of raw materials at places such as Docks and Port encompassing: ICT sector, Green Research & Development, etc	
	Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of long-beloved buildings, especially those with demonstrable evidence of Holy Worship.	Reaching out to speculative developers is not the purposes of these documents.
	Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of landmark buildings, especially those with key links to an area's founding or history locally.	Reaching out to speculative developers is not the purposes of these documents.
	All Powers to monitor, collaborate with existing and/ or new property owners to conserve these buildings should become mandatory with appointed Community Champions for Civic Heritage that area direct link between Local Authorities and said wider key stakeholders to prevent demolition of structures that may be at risk of destruction from vandalism, urban exploration and demolition.	Reaching out to property owners is not the purposes of these documents.
	Reconstruction Programme harnessing existing limited crafts people's skillsets to be used as a fundraising vehicle to bring back buildings that may have been demolished to dissuade future demolition as a choice by property owners and by means of expanding these otherwise lost skillsets that are at live risk of becoming extinct from the UK. 13. Checklist of buildings at high risk must be expanded beyond the existing groups and organisations that are saturated with high caseloads, such as SAVE Britain's Heritage, etc so that dialogue channels can be created and fostered between Community Champions for Civic Heritage. 14. Bespoke-tailored funding packages for Properties at Risk of decline or demolition should be integrated with Local, Regional and Central Government-funding as a means of regional economic output through the return on investment that	Identifying and locating of materials and skills are beyond the scope of these documents.

Appendix A

	may support other key grant funding capital infrastructure projects, such as transportation and drainage improvements.	
SECTION 3: Conservation areas	Alterations for Listed Building Consent must be simplified with additional streamlined testing methodologies, such as proof of legitimate third party support, such as correspondence chains between applicant and Groups, such as The Victorian Society that can assist LAs complete workload much sooner allowing more attention for challenging cases, such as Non-Designated Heritage Assets at live or upcoming risk of demolition by Housebuilders, etc.	The process of applying for listed building consent is set out in national legislation and regulations and beyond the scope of these documents.
	Highways & Street Furniture should be duly supported across the whole of an area to enhance its historic appeal to the commercial community as much to its indigenous community; as this is supported greatly in equivalent Public Realm Strategy SPDs where any and all guidance and support must and should be provided, with key at risk projects being an exceptional anecdote that may be cited in future documents or versions of this and other consultations to stimulate economic construction and restoration across other designated Conservation Areas, etc or otherwise.	Considerations for specific features in any new development would be more appropriate in site specific design-codes.
	Provide incentives for the return of lost adornments and decorative features, such as roof fixtures like Chimney Stacks once again with an approved contractor directory to make Old Builds practical to own, live and work in the 2020s onwards. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of decorative features must be provided by the Local Council.	Grants and financial matters are beyond the scope of these documents.
	Permissions for authentic replica and more durable materials, such as reproduction sash windows must be supported to prevent exorbitant high costs through procuring these, limited longevity and economic climates being unstable. This must be	Considerations for specific features and materials in any new development would be more appropriate in site specific design-codes.

Appendix A

	assessed on a case by case basis. 5. No more deliberate manipulation and selective misinterpretation of using contemporary modern designs using old-style fabric raw materials, such as stone cladding for new housing where the design and shape clearly undermine the concept of blending within or around a Conservation Area.	
	Compendium of approved and recognised TVA Architects based across the UK with a view to supporting the training in time of more Northern counterparts to reduce cost associated with travel expenses, etc. This will actively reduce the level of demolition applications countering the purpose of this SPD and other live Policy. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of decorative features must be provided by the Local Council. 7	This is beyond the scope of these documents.
	New Conservation Areas should be established covering areas of surviving built historic environment to positively reverse fascia changes to more modern ones. 8.	Designating new conservation areas is beyond the scope of these documents.
	Blue Plaques should be fully supported across as many different Conurbations, especially if Applicants reach out for endorsements	Assigning blue plaques is beyond the scope of these documents.
	Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with collaborate fundraising models utilised from key stakeholders, such as property owners, undisclosed third party investors, Residents' Groups, etc. Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with authentic identical reproductions permitted where all options to secure finance have been fully exhausted and/or the existing streetscape is at imminent risk of receiving contemporary	Considerations for specific features and materials in any new development would be more appropriate in site specific design-codes.

	replacement street furniture on health and safety grounds, eg. Lap Posts.	
	Discretionary Rate Relief should be provided to those proactively support LAs with conserving their respective Conservation Areas through their own resources, skillsets and time as an incentive to others to work alongside the Council positively and constructively. Where long-lost prized buildings are reconstructed whether based in a Conservation Area or not this should confer discretionary financial support, e.g. Rate Relief for the length of time taken to produce this outcome acknowledging the embodied carbon now contributing positively towards the LA's Climate Change Action Plan Targets	Grants and financial matters are beyond the scope of these documents.
SECTION 4: Climate change	Pleased to note that LAs broadly acknowledge and grasp this concept therefore the aim should be to increase the net number of carbon-rich Old Builds long-term through support packages that will combat the Climate Crisis, provide economic benefit and improve Conservation in a pioneering fashion that may draw wider funding opportunities for the area.	Specific requirements or measures to include technology to reduce carbon emissions are beyond the scope of these documents. The council declared a climate emergency in 2019 and has pledged to be carbon neutral by 2030.
	Retrofit Ventilation is a key point that should warrant future new construction utilising higher ceilings through the reconstruction of Old Builds outfitted for the modern day with retrofitted energy supplies, etc that will also serve to break down societal divides regarding perceived good and bad areas where streetscapes are harmonious yet distinctly unique in beauty like any one Conservation Area.	Considerations for specific features and materials in any new development would be more appropriate in site specific design-codes.
	Embodied energy and embodied carbon- must remain a central priority and so influence new construction to readopt TVA principles as this will be pivotal towards the area's future green credentials as outlined in many existing auxiliary planning documents approved presently with Carbon Studies taken of existing architecture, notably buildings saved from demolition.	Noted.

Appendix A

	<p>A brick by brick case study of as many buildings as possible may warrant invitation of national and international academic institutions to undertake a regional or national Carbon Study further justifying the retention of prized Old Builds elsewhere across the area, region and the UK.</p>	<p>An in-depth case study is beyond the scope and resource of these documents.</p>
	<p>Sustainable Materials- an approved contractor directory that could readily advise and source the necessary raw materials with realistically reduced costs substantially Page 13 of 18 again deterring potential demolition-driven applicants from consuming workload time of the Planning Department. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of sustainable materials must be provided by the Local Council.</p>	<p>A contractor directory is beyond the scope of these documents. Specific development proposals are more appropriately presented in site specific design codes and considered at planning application or local plan site allocation stages.</p>
	<p>Biodiversity- maximise greenery along all arterial roads and commuter routes with dense tree planting and the introduction of hedgerows and wherever possible financial incentives to get more private property owners on side.</p>	<p>The design code documents contain sections on blue/green infrastructure and open spaces.</p>
	<p>Flooding Defences- existing and prospective hotspot areas should be clearly identified for emergency grant funding whereby Local Authorities, especially across a region may agree with the respective Government Department to distribute emergency flooding to prevent costly consequential recurrent repairs.</p>	<p>Grants and financial matters are beyond the scope of these documents.</p>

Appendix A

	<p>Transportation using arterial roads and commuter routes (Motorways and Railways) should prioritise linking each end of a Local Government sphere with the surrounding Local Government spheres, such as Southport at the very northern tip of Merseyside where transportation links are much weaker with Lancashire in the north and east than with the rest of Merseyside to the south.</p>	<p>This does not refer to Bedford borough.</p>
	<p>Coastlines should be reclassified as SSSIs, especially where the economic potential is not being fully realised, such as Coastal Towns with underused Beaches, such as Southport in Sefton as one example for other LAs.</p>	<p>Bedford borough does not contain any coastline.</p>
	<p>Financial Incentives for the demolition of Carbon-poor Glass Towers and contemporary construction should be utilised to restore the skylines across any one area whilst providing better mathematical application of the space for residential and commercial use, such as larger tenement buildings or the original streetscape reinstated yet designated specifically for housing where there may be a deficit.</p>	<p>Grants and financial matters are beyond the scope of these documents.</p>
<p>SECTION 5: Historic buildings</p>	<p>Create a Designated AND a Non-Designated Heritage Asset List, such as AHV whereby existing buildings and those that may yet return can be logged and recorded to combat the Climate Crisis whilst making heritage work for LAs in modern day with attractive locations timeless for everyone to appreciate enhancing the investor appeal, all-round interest and acknowledging the industrial pioneering legacy of the City.</p>	<p>Heritage asset lists are beyond the scope of these documents.</p>
	<p>Clearance of vegetation along the Railway Lines alongside other equivalent parts of the Line to eradicate the perceived neglected aesthetic.</p>	<p>Maintenance of railway lines is beyond the scope of these documents.</p>

Appendix A

	<p>Exception Areas, such as those at risk or recently restored have the real potential for wider grant funding for ambitious projects out of the realm necessarily of undisclosed third party investors supporting Property Owners, therefore all and any support in reaching these person(s) will greatly contribute to all possible tangible success in the interim period.</p>	<p>Grants and financial matters are beyond the scope of these documents.</p>
	<p>Providing key guidance, such as agreed in-keeping historic street furniture, such as Cast Iron Lamp Posts, Bins, Planters approved upon inspection of historic photographs, agreed installation and where appropriate maintenance by the LA will ensure the iterative success of this transferring to other Conservation Areas, etc.</p>	<p>Considerations for specific features and materials in any new development would be more appropriate in site specific design-codes.</p>
	<p>Scheme to rebuild and reconstruct long-lost buildings, prioritising vacant sites that could adapt some mixed use with residential accommodation and commercial application thereby supporting Climate Action, creating employment and recordable success through placing of necessary economic drivers, such as offices for Technology Sector if original use cannot be sourced in sufficient time simultaneously meeting housing targets.</p>	<p>Considerations for specific features and materials in any new development would be more appropriate in site specific design-codes.</p>
	<p>Archive Blueprints for historic conurbations that have suffered architecturally over time through building conversions, demolitions, etc should be provided to key stakeholders, if necessary with a printing charge available for official spiral hard copy version to view detailed historic plans covering layouts, etc.</p>	<p>Archiving materials related to the historic environment is beyond the scope of these documents.</p>
	<p>Those people and organisations that have either/ both maintained their properties well over the years or may wish to provide additional support to others, such as restorative support, archive blueprint guidance, etc should be eligible for discretionary reductions by the Council across various property</p>	<p>Grants and financial matters are beyond the scope of these documents.</p>

Appendix A

	taxes where they may be suffering hardship or through personal circumstances.	
	Newer” style housing with true authentic rhythm, such as Suburban style faux Tudor fascia frontages with red clay tile pitched roofs and terracotta design windows (tile hung walls) are a good compromise whereupon finance and scheduling may otherwise adversely impact on housing settlements.	Considerations for specific features and materials in any new development would be more appropriate in site specific design-codes.
	Fascia Frontage details should be reinstated whether in a Conservation Area or not, especially where approval has been granted to rebuild an entire house using breeze block to produce a stereotypical black, white and grey dwelling out of plac	Considerations for specific features and materials in any new development would be more appropriate in site specific design-codes.
	LAs should work closely with Foundries to procure raw materials and building services in the event of harnessing their own Contractor Firm(s) in-house that could work cross-authority to make net savings whilst ensuring particular new housing neighbourhoods conform to an appropriate style.	Identifying and locating of materials and skills are beyond the scope of these documents.
	Modern “Carbuncle” extensions should not be permitted at any one area- instead an authentic style addition may be used to retain blending.	Noted. The purposes of these documents is to provide guidance on analysis of context and character of an area any new development is proposed.
	Discretionary financial support packages to assist House Builders choosing the traditional vernacular route should be considered and utilised where it can be proven that this third party will restore the historic streetscape yet making it applicable or modern day requirements- residential or commercial. This may be especially so where they are able to help others prevent the demolition of a prized Old Build built before the 1950s.	Grants and financial matters are beyond the scope of these documents.
SECTION 6: Traditional Vernacular Architecture	Provide a directory of approved and trusted Conservation Specialist Contractors- this will be key for repairs and maintenance reducing costs for all parties, expediting the physical process of regeneration and smoothen planning work	A contractor directory is beyond the scope of these documents. Specific development proposals are more appropriately appropriate presented in site specific

Appendix A

	schedules so that finer detail may be considered on priority cases or those that may be at risk of consequential repair, such as Places of Worship and detached Buildings with flat roofs, etc at higher risk of damage than customary dwellings.	design codes and considered at planning application or local plan site allocation stages.
	These same people should be readily contactable for new construction 3. Encourage smart building methods and use of TVA as meticulously explained in this SPD outlining “Breathing” Solid Wall Construction using older style materials thereby reducing maintenance cost which combined with the approved contractor directory will further drive down costs, time and effort for everyone. 4	A contractor directory is beyond the scope of these documents. Specific development proposals are more appropriately presented in site specific design codes and considered at planning application or local plan site allocation stages.
	Alterations- must introduce a simplified listed building consent form and application process that is streamlined encouraging better maintenance of Old Builds and reducing the rising propensity of builders to allow buildings to deteriorate, such as the Historic Pub that had to be rebuilt in Kilburn, London post 2015.	The process of applying for listed building consent is set out in national legislation and regulations and beyond the scope of these documents.
	Provide specialist Heritage Arts & Craft Skills Programmes that anyone can learn and use so that these high cost tasks can eventually stabilise in price making them more affordable and available to those that don’t have the time to do this themselves or may be risk averse even.	The provision of skills programmes is beyond the scope of these documents.
	Extensions- there must be a proactive emphasis on in-keeping structural fabric to prevent future errors, such as the Municipal Building depicted in the SPD being replicated again thereby harming the Conservation value. 7. New Housing Estates should adopt historical archival blueprints, ie. A Georgian, Victorian or Edwardian layout with the likeliest period architecture utilised where this area remained greenbelt until the 1950s.	The purposes of these documents are to provide guidance on analysis of context and character of an area any new development is proposed.
	Area Expansion of housing must revert to traditional timeless designs that confer many practical advantages over modern styles that are harder to maintain are timeless with regard to	Considerations for specific features and materials in any new development would be more appropriate in site specific design-codes.

Appendix A

	dating and ensure a more evenly distributed community atmosphere in the long-term future.	
	Infrastructure should be appropriately considered for existing and new areas so that no one area is at risk of becoming congested through traffic for a particular commodity, such as Schools, Doctor Practice, Dental Practice, etc.	Noted.
	Site Layouts should complement the historic layout with a view to Post 1950s contemporary Architecture out of place being one day demolished to reinstate Longlost beloved buildings from before the World Wars that could blossom economically today.	The purposes of these documents are to provide guidance on analysis of context and character of an area any new development is proposed, including street layout.
	Building Form shouldn't permit for dated modern structures that delineate and essentially divide communities between the old and new parts of any one location.	The purposes of these documents are to provide guidance on analysis of context and character of an area any new development is proposed, including street layout.
	Façade Design mustn't be compromised for contemporary architecture, especially in view of coveted Heritage Status for any one area being at risk of being lost if said contemporary architecture is pursued.	The purposes of these documents are to provide guidance on analysis of context and character of an area any new development is proposed, including street layout.
SECTION 7: Making an application	Identify recurring applicants that are harming civic heritage, be this across Conservation Areas, Non-designated heritage assets or elsewhere with experience of demolition to date- this should be considered before granting permission to apply or acquire planning approval.	This is not within the scope of these documents.
	Enforcement Penalties for key stakeholders that purposely allow their properties to fall into decline and hoped eventual demolition through this tactic, which is more prevalent since 2020.	Issuing of enforcement notices is not within the scope of these documents.
	Create an Action Plan to deter persons or organisations from pursuing demolition, such as financial incentives, sincere investor network directory set by Central Government to offload for profit and enforced Design Codes that cannot be manipulated through semantics like Design Guides in isolation	Grants and financial matters are beyond the scope of these documents.

Appendix A

	as has happened elsewhere. This must be kept for emergency instances where there is an expected threat of decline or demolition.	
	Agreed that temporary alteration of heritage sites, such as stairs or ramps for wheelchairs should be utilised to prevent deleterious loss of historic surroundings and features alike.	Noted.
	Full Pre-Consultation publicised and utilised to ensure appropriate Design Codes for new housing alongside positioning and layout in case volunteer assemblies may assist property owners with restoration of historic buildings.	Requiring pre-consultation publication of any new potential development is not within the scope of these documents.
	Brick by brick Analysis undertaken of projects set for Traditional reconstruction so that these statistics may provide both the Council with evidence for green grant funding support for other key infrastructure projects, such as Transportation and Page 17 of 18 Drainage Defences and property owners may incur a discretionary reduction in associated reconstruction costs of heritage buildings and vistas.	An in-depth case study is beyond the scope and resource of these documents. Grants and financial matters are beyond the scope of these documents.
	Ability to lock feedback in for Consultation automatically unless the council can alert interested consultees in taking part again whether they are locally, regionally or nationally based.	Noted.
	Special partnerships with Property Owners of historic buildings at risk of decline/ demolition to discreetly support them with the option to publicise this accordingly to reach out to others in the same position to secure alternative use for these structures as opposed to demolition.	This is beyond the scope of these documents.
	Proactive effort to stop Breaking and Entering style of “Urban Explorers” who are coincidentally apparent whenever demolition is scheduled for buildings especially since 2020.	This is beyond the scope of these documents.
	LAs to proactively work closely alongside Community Champions and other leading Heritage Groups, such as English Heritage giving these organisations a voice on the frontlines, especially where so many buildings are presently being	Where required, the council consults a wide range of stakeholders including heritage groups at local and national level.

Appendix A

	overlooked for additional guidance and/ or support due to cost and time restraints facing these same groups and organisations (including the LA).	
SECTION 8: MISCELLAENOUS	Provide all possible support for the reconstruction of Old Builds as is happening elsewhere across Europe, especially Budapest, Hungary, North America, etc to significantly increase Embodied Energy/ Carbon storage.	Considerations for specific features and materials in any new development would be more appropriate in site specific design-codes. The purposes of these documents is to provide guidance and support on considering character and context of an area where new development is proposed.
	Establish a Plan to adopt Unadopted Roads or supply key services, such as carriageway resurfacing as disabled access and entry/ exit of Emergency Vehicles is presently a cause for concern.	The adoption of roads or services is beyond the scope of these documents.
	Provide Pre-Approval and agreement of specialist Conservation Area style Historic Street Furniture, such as Cast Iron Lamp Posts, Bins and Planters for this prime Conservation Area including installation, maintenance costs (where appropriate).	The process of applying for the appropriate permission or consent (where it is required) is set out in national legislation and regulations and beyond the scope of these documents.
	Provide full access to the Archive Resources (at no/minimal cost) as an invaluable incentive for existing and parallel undisclosed third Party Investors. Discretionary waivers may be appropriate for those third parties proactively working to prevent decline and demolition of historic buildings.	This is beyond the scope of these documents.
	Car Parking on and off street should be supported to ensure freedom of choice for everyone, accessibility and connectedness. Car Parking abodes should be tastefully designed like modern-day stables for vehicles that are in-keeping with the built historic environment.	Noted. These documents include reference to parking solutions and the council has published guidance through the Parking for Sustainable Communities SPD.
	Provide publicly published names of consultees willing to work alongside the Local authority and other key stakeholders, such as property owners and undisclosed third party investors, et.	This is not within the scope of these documents.

Appendix A

	Provide select tours for prospective investors and housebuilders of existing traditional architecture where Design Codes of this identical style would complement both old and new architecture bending the area better more cohesively, eg. the form and layout of Oxford City Centre which has changed minimally structurally since the 1800s.	This is not within the scope of these documents.
	Provide a focused effort on utilising people's skillsets on a meritocratic basis, ie. Procure specialists and volunteers that could work together on key emergency projects, such as Historic buildings at risk without layered bureaucracy on achieving positive outcomes, such as Community Assets where deadlines can be thwarted by separate third parties.	This is not within the scope of these documents.
	Create a Top Ten Historic Buildings at Risk Register where appropriate conditions, such as security against Urban Exploration, etc can be utilised safeguarding these structures, providing the respective property owners peace of mind whilst actual scope for revitalising these for solid economic gain.	This is not within the scope of these documents.
	Infrastructure assessments should be fully outlined, such as Air Quality risk from new construction at presently congested areas, hence the case for Traditional Architecture that will confer longevity benefits in the long-term with as much free car parking as possible.	Noted. Suitable studies to support prospective new development are required as part of the local plan preparation process and the planning application process.
	Free Car Parking may be monitored through expected proof of purchase when visiting, eg. minimal £1.00 at a shop encouraging partnerships between private businesses and Las.	This is not within the scope of these documents.

Sport England

Topic or reference	Comment	Response
Active design	Sport England recommends that the Council consider embedding Active Design further within the Design Codes by having clear references to Active Design, its principles and the	Support welcomed Page 28 of the Design Code: Urban and Suburban Areas:

	<p>Active Design Checklist. Sport England has a <i>Active Design Guidance within Design Codes</i> document which aims to assist Local Planning Authorities (and others) producing Design Codes to understand how they can embed and engage Sport England’s Active Design principles which hopefully would be of use to the Council, this can be found at https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design?section=design-code-guidance-section.</p> <p>There are also other Active Design material that could be of assistance as the Council develops the Design Code documents, for example a suite of ‘illustrative places’ that illustrate how Active Design could be embedded in a particular environment such as town centres, new towns and existing suburban neighbourhoods as well as case studies, which can be found at https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design?section=case-studies-section</p> <p>The Active Design guidance can be found at https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design?section=active-design-guidance-section</p>	<p>Open space provision</p> <p><i>New development should provide open space in line with the open space standards in the Allocations and Designations Local Plan and Open Space Supplementary Planning Document and identified needs.</i></p> <p><i>Natural England have prepared green infrastructure standards on a national level, which measure provision differently from local standards. Both national and local standards should be referenced and an analysis undertaken to ensure new development achieves appropriate compliance. This analysis should include considerations from Sport England’s Active Design principles and guidance (include links) to ensure that green infrastructure to supports health, activity and inclusive access alongside environmental objectives.</i></p>
<p>Open space/sport facility provision</p>	<p>Sport England notes that the documents refers to standards for playing pitches and built sports facilities. Sport England does not support a standards approach to providing new sport facilities as it is not based on local sporting needs nor addresses the nuances of sport facility provision, for example it does not indicate what type of playing pitch is required (e.g. Football, Cricket etc.) and the vital supporting infrastructure that is required for them to be sustainable. They could also</p>	<p>In the Design Code: Urban and Suburban Areas, on page 55:</p> <p><i>Open space provision: Within the town centre area type, there will be development proposals that require new public spaces or play provision in line with local identified needs.</i></p>

	<p>result in small sites and sites not in strategic locations that could be difficult to use and maintain. Sport England advises that the planning for sport facility provision should be informed by a robust assessment and strategy, such as the Council's Playing Pitch Strategy (although the Strategy does not appear to have been reviewed annually so is likely to soon be considered out of date).</p>	
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Resident

Topic or reference	Comment	Response
<p><i>Are the documents easy to follow and navigate?</i></p>	<p>I think the documents would benefit from being more concise. I don't know who the intended audience is of course but 114 pages is too long for most non-professional residents to want to read.</p> <p>There's quite a lot of jargon (what does 'legibility' mean?) and use of terms like 'green infrastructure' which can be confusing (I thought it referred to solar and wind energy generation and EV charging points).</p>	<p>Design codes are inherently detailed, providing comprehensive guidance across a wide range of users, and are structured so readers can focus on the sections most relevant to them rather than reading the document in full. The National Planning Policy Framework includes a glossary that explains many of the terms used across the three documents.</p>

<p><i>Does the commentary on the policy context appropriately set the scene for promoting design quality in the borough?</i></p>	<p>Yes but I think there’s too much emphasis on integration with the existing built environment and legacy assets. Again I’m thinking about green energy – there’s no guidance or recognition about how solar roof panels can ‘fit in’. None of the many images show solar roof panels apart from the negative aspects of panels being applied after development and spoiling the design. I think the guidance should be strongly promoting roof top solar instead of being concerned about gables and dormers.</p>	<p>Add to the Design Code - Urban Extensions and New Settlements SPD:</p> <p><i>“Large urban extensions and new settlements should set a high standard in the integration of renewable energy as a fundamental component of place-making. Development should incorporate appropriate and suitable technologies, such as roof-mounted solar photovoltaic panels, planned from the outset to maximise energy generation across the site, while responding sensitively to building form, layout and local character, particularly where development may affect heritage assets or important views. Where this cannot be achieved due to site-specific constraints, equivalent on-site renewable or low-carbon measures should be clearly demonstrated with installations designed to minimise visual impact while maintaining energy performance</i>”</p> <p>Add to the Design Code - Urban and Suburban Areas SPD:</p> <p><i>“Where heritage assets, their settings or important views are present, renewable energy installations should be sensitively designed and positioned to minimise visual impact without undermining overall energy performance aspirations”.</i></p>
<p><i>Are the analyses contained within each helpful to your understanding of the qualities and</i></p>	<p>Partly, but I’d like to understand how many people are affected by each of the three documents. The local plan talks about number of dwellings but none of the three documents tells me about the number and type of people (adults, children,</p>	<p>Noted.</p> <p>These documents provide guidance on design aspects of proposed new developments. They expand on design related policies in the development plan, particularly the</p>

Appendix A

<p><i>characteristics of the places and spaces they seek to provide guidance for?</i></p>	<p>employees, retired, residents, visitors etc.) who might be impacted and how.</p>	<p>Local Plan 2030, which was subject to an equality analysis and supported by evidence regarding housing mix.</p> <p>Detailed proposals and their impact are more appropriately considered at a site-specific stage, including any design code that may be required.</p>
<p><i>Are the advice and direction given in each appropriate, easy to understand and useable?</i></p>	<p>All a bit too vague for me and a bit too easy for NIMBY's to use in order to raise objections.</p>	<p>These documents provide guidance on design aspects of proposed new developments. They expand on design related policies in the development plan, particularly the Bedford Borough Local Plan 2030. More specific detail can be provided at other stages in the planning process that may require a site-specific design code, including site allocation in the local plan preparation process or through planning applications.</p>
<p><i>Do they suitably support the design policies in the development plan (Local Plan 2030 policies 28S to 30)?</i></p>	<p>I would have to agree that they do with a reservation about safety which doesn't seem to be fully addressed in documents themselves. Also, as stated previously, there's too little about green energy but then again apart from the 'green infrastructure' provision, there's nothing in the policies about this.</p>	<p>Noted. Safety is mentioned throughout the documents, with reference to secured by design principles.</p>
<p><i>Do you have any other comments.</i></p>	<p>1. I'd like to see more consideration given to how people use spaces differently at different times of day and in different seasons. Cycling to and from school is a different prospect when days are short or when the weather is bad.</p>	<p>Noted. These are valid points, but it is difficult to account for every scenario. The purpose of these documents is to provide general guidance on how design aspects should be considered in prospective new development. Site specific considerations would be more appropriate at other stages of the planning process such as site allocation or planning applications, which may require site specific design codes.</p>

Appendix A

	<p>2. Some guidance on safety lighting and shelter in public spaces would be useful (for example, bus shelters versus bus stops, low level lighting for public footpaths).</p>	<p>National guidance, including Manual for Streets and Inclusive Mobility (DfT), BS 5489 road lighting standards, secured by design principles, and local documents such as the Local Transport Plan and Bus Service Improvement Plan, cover lighting, shelter, visibility, and safety at bus stops and along pedestrian routes. These documents should be read alongside existing national and local guidance.</p>
	<p>3. ‘Swept pathways’ indicates a level of maintenance that may not be delivered without a commitment to dealing with litter, fly-tipping, dog mess, autumn leaves and snow and ice clearance. Small things like muddy patches and puddles can make pathways effectively impassable for vulnerable people and reduce accessibility. Recommendations for use of pathway materials would be helpful.</p>	<p>Insert into the Design Code – Urban and Suburban Areas:</p> <p><i>“Pathway and footway design should prioritise durability, ease of maintenance, and year-round accessibility, with materials used to prevent erosion and surface deterioration that can particularly affect vulnerable users”.</i></p>
	<p>I don’t think Ebenezer Howard is inspirational. The Garden City vision is a hundred years old and isn’t appropriate for 21st Century needs and challenges.</p>	<p>Noted.</p>
	<p>5. Community cohesion would be promoted by small scale community energy programs but there’s nothing in these documents to promote that as a design consideration for developers.</p>	<p>Noted. Add:</p> <p><i>“Large urban extensions and new settlements should set a high standard in the integration of renewable energy as a fundamental component of place-making. Development should incorporate appropriate and suitable technologies such as roof-mounted solar photovoltaic panels, planned from the outset to maximise energy generation across the site, while responding sensitively to building form, layout and local character, particularly where development may affect heritage assets or important views. Where this cannot be achieved due to site-specific constraints, equivalent on-site renewable or low-carbon should be</i></p>

Appendix A

		<p><i>clearly demonstrated with installations designed to minimise visual impact while maintaining energy performance”.</i></p>
	<p>None of these documents show how local employment opportunities can be incorporated into high quality design. I didn't see how commercial and industrial units can be integrated into large urban extensions. It seems to me that the approach is to separate offices, commercial units and warehouses and screen or hide the latter as much as possible. What if anything has been learned from Wixams? Again, no mention let alone promotion of rooftop solar giant warehouses and commercial buildings.</p>	<p>The design code supports mixed and balanced communities, including the integration of employment uses within large urban extensions. Guidance on layout, scale, movement, servicing and interfaces is intended to enable offices, commercial and light industrial uses to coexist with residential development through good design, rather than separation or concealment. Site specific proposals would be more appropriate at other stages of the planning process, including site allocations in local plan preparation and planning applications.</p> <p>See our previous response regarding renewable energy above</p>
	<p>Universal studios presents a unique challenge for Bedford. Does the tall buildings guidance apply to theme park rides? Is it OK to be able to see an (illuminated?) roller-coaster or Ferris Wheel from miles away across the Bedfordshire plain?</p>	<p>The tall buildings guide applies to development proposals in the urban area boundary as defined within the scope of the design codes and Local Plan policies. Development will be assessed on a case-by-case basis, having regard to height, scale, visual impact and effects on landscape character, heritage assets and key views. Any proposals associated with the Universal development site would be considered through the planning application process against the full range of relevant policies, including those relating to design, landscape, heritage and visual impact, rather than requiring bespoke amendments to this guidance.</p>
	<p>8. Where I live there is an issue with vehicles parking on grass verges beside the highway and turning the grass verges into rutted mud baths. There are problems too with vehicles</p>	<p>Add under green infrastructure section of the Design Code – Urban and Suburban Areas:</p>

	<p>including delivery vans parking with two wheels on the pedestrian pathway and blocking the path for buggies and causing problems for the partially sighted and others with disabilities. What does the design guidance offer to address this problem in urban and suburban places?</p>	<p><i>Green infrastructure should integrate with street and parking layouts, protect footways and maintain the quality of streets and public spaces.</i></p>
	<p>I don't want to sound too negative, overall, the documents are good; I'd rate them as a seven out of ten. I hope you find my comments helpful.</p>	<p>Noted.</p>

Wilstead Parish Council

Topic or reference	Comment	Response
	<p>Having three very different consultation end dates is confusing, even more so given this consultation was relatively short, being only around 4 weeks, which means effective engagement for Parish Councils as the first tier of local government have been limited with being able to fully reflect and consider these important consultation documents.</p>	<p>Four weeks is the statutory consultation period applicable to Supplementary Planning Documents and also the time period as set out in the Statement of Community Involvement. The consultation period was extended a further two weeks, closing on 17 April enabling additional engagement to take place. However, it is acknowledged that inconsistent dates appeared across the website, email communications and some consultation documents. This lack of clarity is regrettable, and it was an oversight that consultees were not made aware of the additional consultation period.</p>
<p>Urban Extensions and New Settlements Design Code</p>		
	<p>South of Bedford Framework document. This document is referenced on many occasions in the Urban Extensions and New Settlements Design Code policy document. As a Parish Council situated in the vicinity of this area and with Council representatives being active in all local authority consultations during the Local Plan 2030 and 2040 process</p>	<p>Delete references to South of Bedford Framework in the captions. The South of Bedford Framework was not taken forward as this related to a specific policy in the Bedford</p>

	<p>there is no knowledge of this document or where to locate it. There was very brief external consultant engagement with Wilstead which then dropped off with Parish Councillors invited to one meeting in November 2023 to discuss a topic paper document relating to the South of Bedford. The terms strategic placemaking were used but there is no awareness this document became a formal strategy or policy document as part of the Local Plan process or outside of the Local Plan process. Having tried to search the Local Plan 2030 examination library as well as the Local Plan 2040 examination library it is not possible to find a document titled 'South of Bedford Framework'. In light of there being no Local Plan 2030 planning policy supplementary document with this name and the Local Plan 2040 was withdrawn which lists a Topic Paper please can the Borough Council confirm where the referenced South of Bedford Framework document is to be found given it is clearly a highlighted future of the Urban Extensions and New Settlements Design Code policy across multiple points (pages 13).</p> <p>Can the Borough Council also confirm when the South of Bedford Strategy Framework document was formally adopted by Bedford Borough Council.</p>	<p>Borough Local Plan 2040, which was withdrawn in October 2025.</p>
	<p>It has been challenging to comment fully on this important planning policy document which so regularly references the South of Bedford Framework, without being able to access or view this associated planning policy document to read the two side by side, to fully understand the strategic direction the local authority is planning for the South of Bedford and any other urban extension or new settlements. If the local authority are relying on the South of Bedford Topic Paper listed in the Local Plan 2040 library dated 2022, as the document being referenced, then it seems illogical and short sighted on how this associated planning</p>	<p>Delete references to South of Bedford Framework in the captions and diagrams.</p>

	<p>policy/topic paper for a local plan deemed not to be sound is now being used to shape future developments in the South of Bedford and wider borough area.</p> <p>What is especially concerning is that there has been no local input given when a number of important items have moved on so much in this part of the Borough since 2022 and 2023. As well as given one of the main reasons the Local Plan 2040 was needed to be withdrawn was the lack of highways infrastructure to support the planned strategic growth through till 2040 with Highways England very clear during the examination process also included in the inspection report that the A421 was not able to manage the load for the development. Given this trunk road is the most key part of the highways infrastructure within the South of Bedford it does feel like there is not joined up thinking already taking place at this early stage of a new emerging Local Plan.</p>	
	<p>Images in the Design Code document reflect flats above retail units, the Parish Council feel that the local authority need to have a greater awareness of the challenges for local businesses to thrive in the local area, so there needs to be a careful balance to ensure there are not empty units in the current challenging climate.</p>	<p>Noted</p>
	<p>Page 13, as an example, there is reference here and then throughout the policy document to the emerging new Wixams settlement, however, there is no detail of what or where this emerging new Wixams settlement is. This really needs clarifying within the document, as the Parish Council are not sure if this relates to Wixams town emerging or new/additional sites such as the East of Wixams and South of Wixams areas which have both come forward as proposed allocation sites. A diagram or some text clarity within the policy document would be helpful to avoid misunderstanding from the community perspective and</p>	<p>East of Wixams and South of Wixams sites were identified in the Bedford Borough Local Plan 2040 as allocation sites. Wixams applies to the site allocated in the adopted plan and any subsequent planning applications, which have both come forward as proposed allocation sites.</p>

	developer perspective as it might differ to the Borough Council Officer interpretation.	
	The document references the policy Landscape Character Assessment for the rural area on page 3, it reads that this assessment document sits alongside the LUE and NS policy, however there is no link to the Character Assessment document to view this document, so the two can be reviewed in parallel. As the Character Assessment is referenced early on, and relates to the rural area, the Parish Council had been expecting to be signposted to the document and that this document would also be out for consultation at this time so the two could be reviewed together alongside one another. This again seems short sighted as it is a very key factor for new settlements or any large housing development whether as part of an urban growth area or new settlement in a rural area. The Parish Council were expecting if the two documents were so interlinked that they would be consulted on at the same time to enable a joined up approach going forwards.	We will include link to this document and other relevant evidence on our web pages.

Wixams Town Council

Topic or reference	Comment	Response
General	However, the Council wishes to raise a number of serious concerns where the content and presentation of these documents may have implications for Wixams and its neighbouring rural communities, particularly Elstow Parish . Wixams Town Council does not support any approach which would enable further unmanaged expansion southwards or eastwards from Wixams, or which risks undermining the clear settlement boundaries between Wixams, Elstow, Wilstead and surrounding villages.	Noted

Design Code - Large Urban Extensions and New Settlements

<p>Lack of clarity around the “emerging Wixams settlement”</p>	<p>The repeatedly refers to an “emerging Wixams settlement”, yet provides no definition or mapping to clarify what land this term refers to. This omission creates significant uncertainty for both residents and local councils. It is not clear whether this phrase refers solely to the currently permitted Wixams development, or whether it is intended to imply further phases or outward growth, including areas previously proposed east or south of Wixams. This uncertainty is unacceptable in a strategic design document and risks misinterpretation by developers and decision-makers alike. Wixams Town Council requests that:</p> <ul style="list-style-type: none"> • Any references to Wixams clearly distinguish between existing permitted development and any future proposals. • No implication of further expansion beyond existing Wixams boundaries is included without explicit policy justification and full public consultation. 	<p>Wixams applies to the existing strategic allocation set out in the Local Plan and any subsequently implemented permissions. This will be clarified in the text.</p>
<p>Impact on neighbouring rural communities</p>	<p>Wixams Town Council strongly supports Elstow Parish Council’s position that Elstow is, and must remain, a rural village, with no part of the parish treated as urban or suburban in planning policy. Design Code mapping which appears to categorise areas of Elstow as suburban or modern suburban neighbourhoods is deeply concerning. Any further growth or densification associated with Wixams risks:</p> <ul style="list-style-type: none"> • Accelerating coalescence between settlements, • Undermining Elstow’s rural character and historic setting, • Increasing traffic pressures through village roads already used as informal diversion routes. <p>Wixams Town Council considers that maintaining clear physical and policy separation between Wixams and Elstow is essential to sustainable placemaking across the south of the borough.</p>	<p>The design code mapping is indicative and illustrative only. It does not define settlement status or treat any part of Elstow as urban or suburban. The code will be amended to make this explicit. We note concerns regarding coalescence, impacts on rural character, and traffic, and agrees that maintaining clear physical and policy separation between Wixams and Elstow is important to sustainable placemaking.</p>
<p>Reliance on an Unpublished</p>	<p>The consultation documents make frequent reference to a South of Bedford Framework, yet neither Wixams Town Council nor neighbouring parish councils can locate this document within:</p>	<p>Agreed. All references to the South of Bedford Framework will be removed.</p>

<p>“South of Bedford Framework”</p>	<ul style="list-style-type: none"> • The Local Plan 2030 evidence base; or • The withdrawn Local Plan 2040 documentation. <p>Strategic expectations for large urban extensions should not rely on a framework that has not been clearly published, consulted on, or formally adopted. Wixams Town Council shares Elstow Parish Council’s concern that reliance on such a document undermines transparency and trust in the plan-making process.</p>	
<p>Highways and infrastructure capacity</p>	<p>During the Local Plan 2040 examination process, a central issue identified was the limited capacity of the A421 and surrounding highway network to accommodate strategic growth. This constraint remains unresolved. Any implication that further development associated with Wixams could proceed without demonstrable, deliverable infrastructure solutions is concerning. Wixams Town Council is particularly mindful that:</p> <ul style="list-style-type: none"> • Additional growth would exacerbate congestion affecting both Wixams residents and neighbouring villages; • Incremental expansion risks eroding settlement boundaries without corresponding infrastructure upgrades. 	<p>Noted</p>
<p>Tall Buildings Guide - Urban Area</p>		
<p>Tall buildings and context</p>	<p>While Wixams is a planned settlement with defined character areas, they must not be used to justify higher density or taller development in locations where it would conflict with:</p> <ul style="list-style-type: none"> • Established relationships with surrounding rural and heritage assets; • The setting of Elstow Abbey and other sensitive landmarks; • Long-standing inspector findings requiring protection of views and landscape context. 	<p>Noted, however the document only applies to sites within the urban area boundary.</p>
<p>Conclusion</p>	<p>Wixams Town Council urges Bedford Borough Council to:</p> <ul style="list-style-type: none"> • Clarify all references to Wixams within these documents and remove ambiguity around “emerging” development. • Explicitly reaffirm settlement boundaries between Wixams and neighbouring rural parishes. 	<p>See above</p>

	<ul style="list-style-type: none">• Ensure no reliance is placed on unpublished or unadopted strategic frameworks.• Recognise cumulative infrastructure constraints and avoid policy signals that encourage premature expansion. <p>Wixams Town Council supports well planned, policy compliant development within defined limits, but does not support any approach that risks unmanaged expansion towards Elstow or the erosion of distinct village identities.</p>	
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Tall Buildings Guide: Bedford Urban Area Supplementary Planning Document

June 2026



Contents

Page number

1 Introduction	3
2 Current situation	4
3 Assessment criteria	15
4 Conclusions	22
5 Appendices	24

Appendix 1 (covered separately)

Appendix 2 (covered separately)



1 Introduction

Background

- 1.1 This supplementary planning document provides detailed guidance in relation to the design and layout of tall buildings to inform future planning decisions in the Bedford urban area.
- 1.2 Relevant planning policies are contained in policies 28S, 29 and 30 of the adopted Bedford Local Plan 2030. While this document does not introduce new policies, it clarifies and assists in the interpretation and application of policies 28S, 29 and 30 when assessing the suitability of tall building proposals, including considerations like scale, microclimate and visual impact on the Bedford skyline.
- 1.3 The guidance is aimed at developers, site promoters, landowners, investors, statutory bodies and the general public and will be used to guide future investment decisions in the Bedford urban area. Once approved, it will be a material consideration in the assessment and determination of planning applications.
- 1.4 It should be noted that this guidance is not intended to promote tall buildings in Bedford urban area or provide details of where tall buildings will not be permitted. Instead, it provides an understanding of the existing skyline and a robust set of criteria to assess applications, helping to preserve or enhance the distinct character of the urban area.

Aims and objectives

- 1.5 The aims of the document are to:
 - respond to and where possible improve the character and quality of the Bedford skyline;
 - ensure that tall buildings contribute positively to important local views and vistas;
 - ensure that proposals for tall buildings are well-considered and appropriate to their context; and
 - provide clarity to the public and developers about our expectations when considering tall building proposals.
- 1.6 The objectives of the document are to:
 - provide a definition of 'tall building' in the Bedford context;
 - outline the characteristics of the Bedford skyline and its townscape character;
 - identify important local views and vistas; and
 - explain how adopted policy will be applied to tall buildings.

Definition of tall buildings

For the purposes of this guide, a tall building is defined as one which 'breaks the skyline' and is significantly taller than the prevailing heights of buildings in the area.

- 1.7** Bedford's town centre - as defined on the adopted Bedford Borough Local Plan [Policies Map](#) - includes a range of building heights, mostly between three and five storeys high. There are several taller commercial buildings and some residential towers on the fringes of the town centre. Across the rest of the urban area, overall building heights tend to be two storeys, with limited areas of three storey buildings and only occasional taller buildings, particularly in some employment areas (as shown on the Policies Map).
- 1.8** Tall buildings should be primarily located in suitable locations within the urban area. They will generally be unsuitable in locations outside the urban area, where development is predominantly low-rise, unless there is a specific operational need to be in a rural location. At this stage, no detailed assessment has been undertaken to identify specific sites within the urban area that may be suitable as tall building locations. Because long views are often available across rural landscapes, tall buildings in these settings can appear visually prominent and intrusive. In exceptional cases, where robust evidence demonstrates that a tall building is justified, proposals should be assessed against the principles set out in this guide.
- 1.9** Tall and higher-density development must prioritise public safety through building form, layout and density that enable safe and effective emergency access from the outset, particularly in constrained urban and town-centre locations, in accordance with the standards in the Bedford Borough Design Guide and this guide.



Bedford College from the river path (top) and from Cauldwell Street (bottom). Source: Google maps

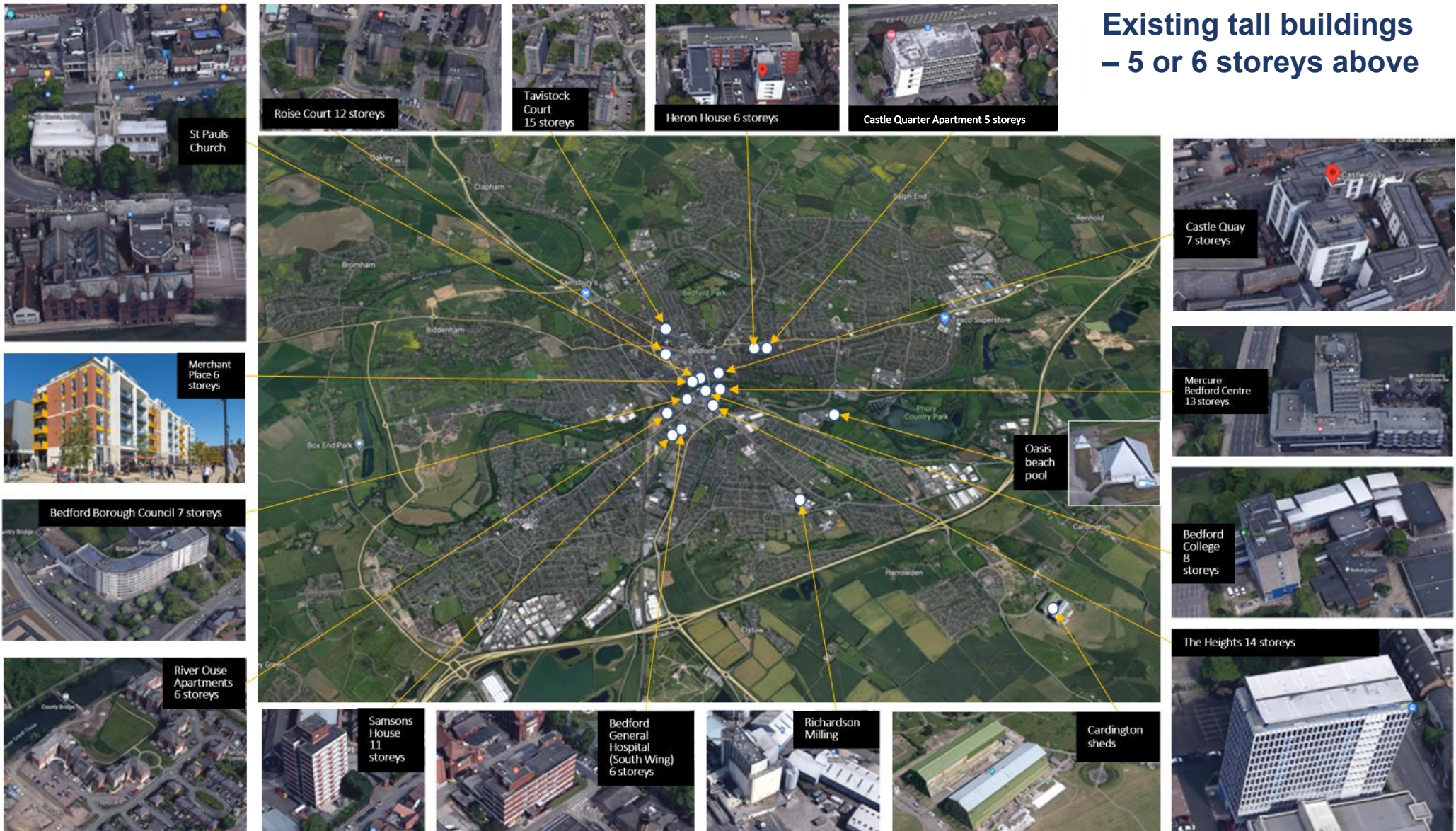
2 Current situation

Introduction

- 2.1 An understanding of the existing characteristics of the Bedford urban area is essential to ensuring its diverse and valued qualities are preserved. This section summarises the character, urban structure, skyline features and key views of the Bedford urban area. It draws on the conservation area character appraisals and management plans in the urban area (Bedford, Elstow and Biddenham) available from our website at www.bedford.gov.uk/planning-and-building-control/conservation-and-heritage/historic-areas-and-buildings



Existing tall buildings – 5 or 6 storeys above



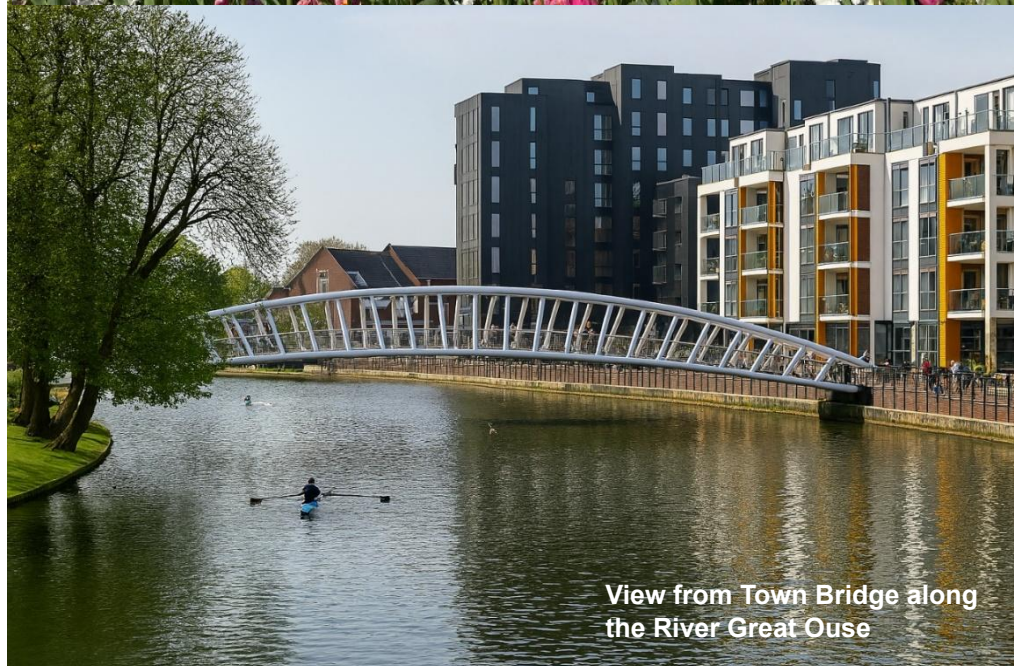
River corridor and open spaces

- 2.2** The River Great Ouse and the open spaces that are associated with it are particularly important to the character of Bedford. These riverside areas enrich the appearance of the town and provide important amenity space and pedestrian routes to and from the town centre. Views along the river, particularly towards the town bridge and St Paul's Church spire, are particularly noteworthy.
- 2.3** Other large parks and open spaces embedded in the urban area include Bedford Park and the adjoining Bedford Cemetery (both grade II listed registered park and gardens), Russell Park, Goldington Green, Addison Howard Park, Jubilee Park, the fields adjoining Elstow Abbey and around Biddenham, and various areas of sports playing fields and allotments. These provide attractive breathing spaces that enhance the setting of surrounding development and serve as vital amenities that benefit the whole community. Views from the open spaces are highly sensitive to change.

Heritage assets

- 2.4** Conservation areas exist to manage and protect the special architectural and historic interest of a place - in other words, the features that make it unique. Change within a conservation area is inevitable and often beneficial.

Suspension bridge on 'The Embankment'



View from Town Bridge along the River Great Ouse

- 2.5** Every conservation area has its own unique character, derived from aspects such as the way buildings look, how the spaces are arranged, views and visual appearance of buildings, spatial arrangement, views and the natural features. The wider setting and surroundings also play an important part in shaping how the area looks and feels overall.
- 2.6** Within the Bedford urban area, four conservation areas have been designated.
- Bedford is a large and varied conservation area centred on the town's historic core. The area exhibits evidence of Bedford's long history as a market town with buildings of different periods and styles and several distinctive character areas that reflects how the town has developed over time.
 - Elstow conservation area lies in the south of the urban area and focusses on the core of the historic settlement of Elstow, including its abbey church, associated buildings and adjoining pasture fields. Its special character comes from its numerous listed buildings (including several of high grade) and its green and open spaces, and views of the parish church, church tower and mansion ruins from various points throughout and from outside the historic settlement.
 - Biddenham conservation area is located to the west of the urban area and includes the historic village centre as well as some properties to the east. Its special interest lies in the preservation of its rural village character despite its proximity to Bedford, the large number of listed buildings, the numerous cottages, farm buildings and links to the arts and crafts movement. Lush greenery

characterises the village with fields to the south and west and its wide grass verges - especially in the centre - add to the sense of openness and tranquil atmosphere. The village is laid out along an east-west route and has several views out to the surrounding countryside, which reinforce its open rural feel.

- Kempston is a small conservation area located in the south-west of the urban area, encompassing the core of the historic settlement. Its special interest derives from the high concentration of listed buildings and the survival of historic structures spanning several periods, from post-medieval timber-framed buildings through to 19th-century development. "The area maintains a strong vernacular character, with local materials such as red brick and clay tiles contributing significantly to its distinct identity. Although the wider settlement of Kempston has grown significantly over time, the conservation area's setting is now largely enclosed within surrounding built development and mature planting, which together help to create a clearly defined and contained historic environment.

- 2.7** Across the urban area - and especially within the conservation areas - there is a concentration of listed buildings, scheduled monuments and areas of archaeological interest. Alongside conservation areas, these features are designated heritage assets and benefit from statutory protection. National planning policy also recognises that changes within the setting of these assets can influence their significance.
- 2.8** A tall building can affect a heritage asset in different ways. It might change important views to or from the asset, affect how it sits within the wider landscape, or alter how

prominent it appears. It can also change how the asset is experienced alongside nearby heritage features. For these reasons, tall building proposals within the setting of heritage assets must include a proportionate heritage impact assessment and views analysis and should refer to relevant conservation area appraisals and management plans.

- 2.9** Where tall buildings already exist and are harmful to the significance of heritage assets, their replacement with a building of a similar height is not automatically justified. Further guidance on the impact of tall buildings on heritage assets can be found at <https://historicengland.org.uk>.
- 2.10** Information relating to listed buildings and other heritage assets can be found on the Bedford Borough Historic Environment Record, which can be accessed from our website at <https://www.bedford.gov.uk/planning-and-building-control/conservation-and-heritage/bedford-borough-historic-environment-record>.

Urban structure and townscape

- 2.11** Townscape describes the visual coherence and organisation of buildings, streets and space that make up the urban environment. It is important to understand the way that these are arranged as they provide the framework to guide future changes.
- 2.12** In Bedford town centre, the broad pattern of roads reflects the historic street pattern. The principal north-south route on both north and south banks of the river, crossing the river at the Town Bridge (High Street / St John's Street) is largely unchanged since medieval times. On either side of this route development extends on consistently narrow frontages.

Beyond this is a large area of eighteenth and nineteenth century development which reflects the rapid outward expansion of the town, especially to the north and west. For the most part, the texture and layout of these areas is remarkably consistent and remains largely intact. This gives the core areas of the town their characteristic scale, styles and materials. Historic public and commercial buildings rarely deviate from this general 2-3 storey scale and style.

- 2.13** Urban renewal in the 1960's and 1970's resulted in the overlaying of, among other things, new shopping precincts, office blocks, a new bus station, multi-storey car parks, highway improvements and blocks of flats. In many cases, these additions do not sit comfortably with the texture and scale of the wider built environment, negatively affecting Bedford's townscape and eroding its distinctive character and sense of place.
- 2.14** Elstow is a village of exceptional historic and cultural significance, defined through Elstow Abbey, founded in the twelfth century, and its strong association with John Bunyan. The abbey formed the spiritual and economic focus of the settlement, with accommodation, shops and inns developing during the medieval period to serve religious life and visiting pilgrims.
- 2.15** Following the dissolution, Elstow continued to thrive as an agricultural village, benefitting from its location on the historic north-south route between Bedford and Luton. Today, the village retains an unusually rich concentration of heritage assets within a well-preserved conservation area. Its form reflects this layered history, combining expansive open spaces associated with the abbey and its setting with dispersed historic buildings, alongside a denser cluster

along the High Street. This depth of historic character remains central to Elstow's identity and sense of place.

2.16 Biddenham village first developed around its church but later expanded eastwards as an agricultural community. The village has a linear and dispersed layout running west-east, following the course of a single road (Church End / Main Road). Although it lacks a clear centre, it has two focal points toward the middle, where the principal road turns. One is the village green, at the junction of Main Road, Church End and Gold Lane, and the other is at Manor Farm and the junction of Church End and Manor Road. At the east end of the village the historic settlement has been extended until it almost merges into the suburban spread of Bedford.

2.17 Bedford expanded rapidly following the building of the Midland railway in 1873, linking the town with London, and associated industrialisation. Rapid house building in the late eighteenth and twentieth centuries created extensive estates of middle class and workers' housing, extending out from the older core. Major areas of public amenity space, shops and other facilities were also laid out, focussed on new suburban centres and particularly Kempston - originally a small town in its own right. An analysis of local distinctiveness areas is included in the Bedford Borough Design Guide.

Characteristics of the skyline

2.18 Skylines evolve and change over time in response to development. Bedford's skyline has undergone such a process in a relatively small scale and incremental way and over a long time period. The skyline of any town will vary depending on the location from which it is viewed. The

opportunities to experience wide, panoramic views of Bedford are limited by topography and the modest scale of buildings. These factors make the skyline highly vulnerable to change.

2.19 Within Bedford's historic core there is a great variety of rooflines. The predominantly narrow plot widths help give the historic core highly varied rooflines where the predominantly two and three storey buildings of varying roof heights and styles are viewed alongside four storey buildings. Around the fringes of the town centre emerge occasional taller buildings, including:

- the spires and towers of churches;
- the residential and office towers in the Greyfriars area;
- hotels; and
- Bedford College alongside the river.

2.20 Beyond the historic core, the prevailing height of residential buildings is generally two storeys with substantial areas of three storey Victorian and Edwardian buildings. The remainder of the urban area largely consists of low-density residential areas that generally lack any prominent focal buildings and lack inter-visibility with the historic cores. Trees, rather than the built form, generally define the skyline within this part of the town. There are, however, some exceptions, notably the tower of Elstow Abbey, the Guru Nanak Gurdwara in Queens Park, several industrial, commercial and leisure buildings, and a few, scattered residential towers.

Existing tall buildings

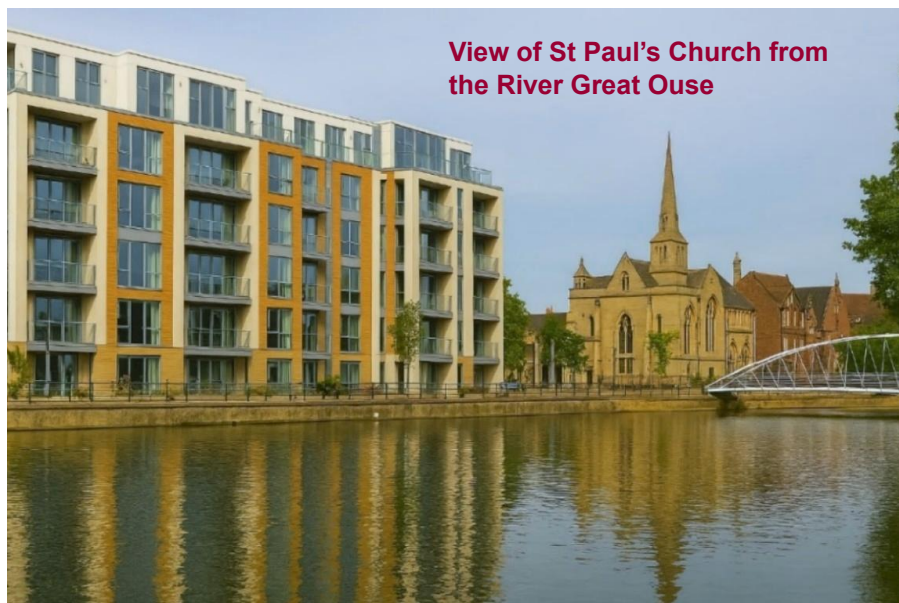
- 2.21** The map in appendix 1 shows the location of tall buildings in the Bedford urban area. Most of these buildings developed in an informal pattern, with only the residential clusters at Greyfriars and Queen Street in central Bedford laid out as formal groups. None of these buildings signal a significant concentration of commercial activity, nor do they produce a distinctive or 'signature' skyline. For the most part, they are residential high-rise buildings and form part of post-war social housing developments. Other tall buildings are hotels or offices.
- 2.22** The intrusion of modern tall buildings has departed from the essential characteristics of the historic townscape¹. This demonstrates the sensitivity of the townscape to development within the Bedford conservation area and its setting, as well as the fact that the setting may be extensive.
- 2.23** Appendix 2 sets out a series of case studies that analyse several existing tall buildings in Bedford using the assessment criteria from section 3 of this guide. From these case studies, several key lessons are highlighted as well as recurring challenges.
- 2.24** Many of the tall buildings in Bedford serve little purpose as way-finding devices and are of poor architectural quality. Few of them can be considered as landmark buildings. A landmark building is one that stands out from the background buildings and is a positive point of reference in the urban scene, however it does not necessarily have to be tall. Such buildings are important elements of the skyline

that contribute to the appearance and character of the area. Landmark buildings are a key consideration in the assessment of important local views and vistas.

2.25 Landmark buildings in Bedford include:

- the iconic spire of St Paul's Church - a prominent feature visible from many directions, particularly from viewpoints along the nearby River Great Ouse (see chapter 2). The spire, although a later nineteenth-century addition, makes a strong contribution to local character and reinforces the distinctiveness of Bedford's skyline. Most of the present church, however, dates from the fifteenth century, providing a rich historic anchor within the evolving townscape;
- Guru Nanak Gurdwara in Queens Park - featuring an intricately detailed white façade with several domed towers, opened in 2007. Its white painted and tiled façade makes it highly visible in this part of Bedford; and
- the grade 1 listed, 13th century bell tower and remaining church structures of Elstow Abbey - set on open land near Elstow Brook - which stand out due to their height and visibility across a wide area, forming an important landmark to the south of Bedford. The detached bell tower and remaining church structures are visible from nearby industrial areas and modern residential neighbourhoods, reinforcing its significance within the wider townscape.

¹ Bedford Conservation Area Character Appraisal



View of St Paul's Church from the River Great Ouse



Elstow Abbey and tower (Source - <https://www.elstow-abbey.org.uk>)



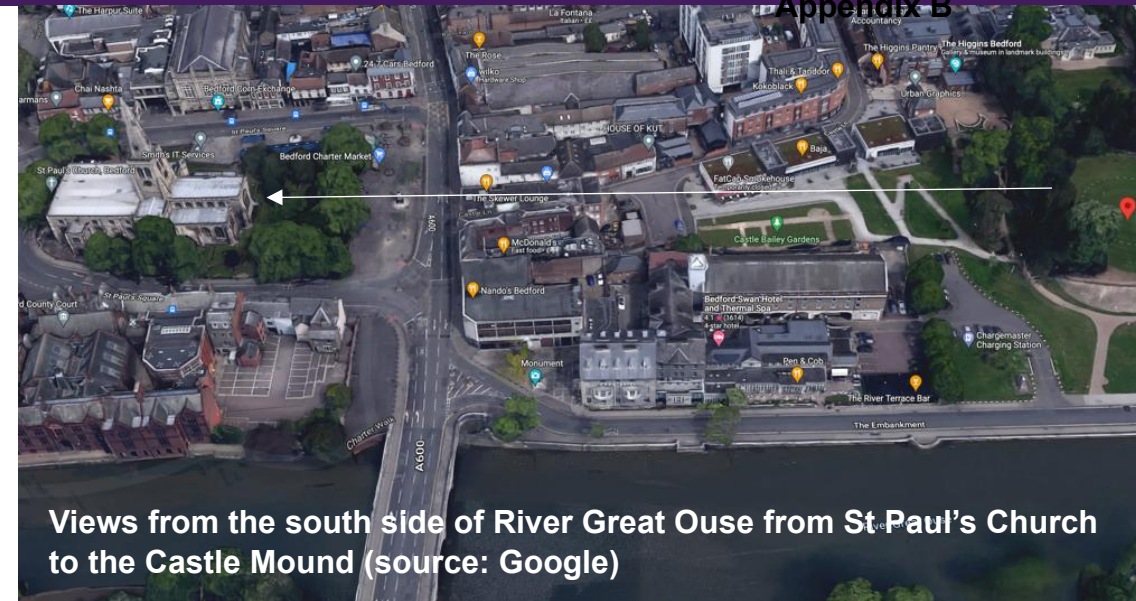
Guru Nanak Gurdwara, Queens Park (source: Google)

Important local views and vistas

- 2.26** Identifying a definitive list of local views is clearly dependent on the location and scale of a proposed tall building. As such, it is not possible to produce an exhaustive list. Local views must be considered on a case-by-case basis. Nevertheless, the conservation area character appraisals and management plans contain guidance on local views and vistas.
- 2.27** Views from other parts of the urban area and beyond are also important, particularly where they relate to identifiable historic skyline features and designated viewpoints across the predominantly flat surrounding landscape, including locations such as the Greensand Ridge, in accordance with policy NE1 of the Bedford Borough Local Plan 2030.

2.28 The Bedford Borough Design Guide (published in 2023) sets out an analysis and appraisal of local distinctiveness areas within the Bedford urban area which exhibit broad similarities in design. These areas are shown on the plan attached at appendix 2 to this document. The analysis sets out several precedents related to height and scale that can serve as reference points when evaluating new tall building proposals and their relationship to the character of the surrounding area. The Bedford Borough Design Guide can be viewed on our website at <https://www.bedford.gov.uk/planning-and-building-control/planning-policy/bedford-borough-design-guide>.

2.29 Tall building proposals must demonstrate that height, massing, and siting protect and, where possible, enhance heritage settings, key views and sightlines from all relevant directions, with evidence provided through robust visual impact and heritage assessments that consider the wider landscape context and longer-range views. The next section sets out criteria explaining how local views should be assessed.



3 Assessment criteria

Explanation of the assessment criteria

- 3.1** The assessment criteria outlined below provide a framework to inform a detailed, evidence-based process that addresses the requirements set out in policies 28S, 29 and 30 of the adopted Bedford Local Plan 2030 (see appendix 1). The criteria cover a broad range of matters relevant to the evaluation of tall building proposals with the intention of ensuring that tall building proposals are well-considered and of the highest quality.
- 3.2** Based on these policies, the design principles particularly relevant to tall buildings are summarised below.

Development proposals should:

1. *be of high-quality design in terms of scale, density, massing, height, materials and layout;*
2. *promote local distinctiveness and contribute to the townscape and landscape qualities of the area. They should have a positive relationship with the surrounding area, integrating well with and complementing the character of the area in which they are located;*
3. *promote a sense of place to include attractive streets, squares and other public spaces with a defined sense of enclosure, with multifunctional green spaces and corridors;*
4. *safeguard the significance of heritage assets and, where appropriate, enhance their qualities, acknowledging that development within their settings could potentially cause*

harm. Proposals should achieve a successful relationship with the historic environment and the established character of the area in which it sits; and

5. *use a design code to ensure that the aesthetic, structural and environmental aspects of the tall buildings meet local standards and community expectations, agreed with the local planning authority.*

- 3.3** Where proposals affect the setting of a conservation area or listed building, detailed planning applications rather than outline may be required. Tall building proposals within a conservation area or affecting highly graded assets will almost certainly require a detailed planning application.
- 3.4** These principles will be used to guide and inform the assessment of tall building proposals at the planning application stage, with detailed guidance on each criterion provided below. Promoters of tall buildings must work through the assessment criteria and ensure that they are fully addressed in their submissions.
- 3.5** Planning applications will need to include written and illustrative evidence to justify the tall building proposals, such as landscape visual impact assessments, heritage impact assessments and visualisations like photomontages or wirelines.

Criterion 1: Be of high-quality design in terms of scale, density, massing, height, materials and layout.

- 3.6** The appropriate scale and massing of tall buildings is an important consideration in achieving the good integration of new buildings and spaces within established urban areas and the wider landscape. An understanding of the

surrounding context is an important step in achieving appropriately scaled buildings.

- 3.7** Tall buildings are often designed to serve as memorable landmark features, making the silhouette of critical importance. Beyond the overall massing, the quality of a scheme can be strongly affected through the manner in which rooftop plant and telecommunications equipment are integrated.
- 3.8** The layout of the proposed development will need to be carefully designed to ensure that the tall building sits appropriately within its site and integrates well with its surroundings while maintaining good functionality and site efficiency to optimise land use, improve accessibility and deliver a coherent and well-designed urban environment. The relationship between the tall building and surrounding development beyond the site boundary should also be evaluated. Where new tall buildings are proposed near other existing or proposed tall buildings, an assessment should address potential cumulative effects.
- 3.9** New tall buildings should demonstrate a clear relationship with their context, drawing on the details and materials of surrounding buildings to ensure a cohesive design. Tall buildings and their materials should be of the highest quality and be sensitive to site context. Building choices should relate positively to their surroundings or provide contrast through thoughtful combination of materials. Special attention should be given to the selection of roofing materials to ensure harmony or effective contrast.
- 3.10** In line with policies 32 and 49 of the adopted Bedford Borough Local Plan, tall building proposals need well-designed internal storage areas that accommodate higher waste volumes, enable separation of recyclables and minimise odour, noise and visual impact. These spaces should be positioned where residents and collection teams can reach them easily. Vertical waste systems can support safe and efficient movement of waste within taller structures, reducing clutter and health risks in communal areas.
- 3.11** Sites must provide safe access routes that allow collection vehicles to enter, turn and load without disrupting pedestrian movement or the wider public realm. Emerging technologies and digital monitoring such as sensors, compactors and smart systems can optimise collection activity and reduce contamination, particularly in tall buildings and dense neighbourhoods. Layout, enclosure design, ventilation and separation distances must prevent odour, noise and litter issues, and waste areas should avoid dominating street frontages or undermining the character of the surrounding area.
- 3.12** Proposals should also demonstrate layouts, streets, public spaces and buildings that address crime prevention and community safety, consistent with ‘secured by design principles’ set out in the Bedford Borough Design Guide. Early engagement with Bedfordshire Police is encouraged.
- 3.13** Active on-site management teams or agents should oversee day-to-day waste storage, movement, maintenance and contamination control to ensure effective long-term operation. Further advice can be found in Bedford’s Technical Guidance: Waste Audits for New Developments (May 2021) which sits alongside policies 32 and 49.

Criterion 2: Promote local distinctiveness and contribute to the townscape and landscape qualities of the area. They should form a positive relationship with its surroundings, integrating well and complementing the character of the area.

- 3.14** The relationship of any proposed new tall building to the surrounding context needs to be carefully examined. A townscape, landscape and urban design appraisal should be prepared which analyses features such as:
- topography;
 - townscape and landscape types and character areas;
 - site history, movement and access patterns;
 - scale, height and massing of surrounding buildings and the setback of buildings;
 - urban grain – noting typical plot sizes and the rhythm of the street;
 - prevailing architectural language;
 - land use;
 - waste storage and recycling areas;
 - areas of open space;
 - listed buildings and conservation areas;
 - local and long-distance views and vistas and local landmarks; and
 - opportunities and constraints.
- 3.15** Urban centres frequently exhibit a tight urban grain, with closely spaced buildings, and this arrangement can lead to problems of overlooking.

- 3.16** Shading associated with tall buildings must be assessed to ensure neighbouring premises, especially those at lower levels, retain adequate light. Public and private outdoor spaces should also benefit from good daylight and sunlight.
- 3.17** Good public realm relies on well-designed spaces around buildings. Tall buildings must be sensitively sited, and mixed uses within larger buildings can help create activity and provide natural surveillance. Proposals must consider their visual impact from key local views, including adjacent streets and open spaces.

Local views include:

- **vistas** - a view from a specific viewpoint looking towards a proposed building;
- **panoramas** - a view from a specific viewpoint looking across a wide area at numerous buildings or structures within the setting of the proposed building; and
- **view corridors** - views from a variety of viewpoints looking at a proposed building set amongst other buildings or structures.

- 3.18** The location of viewpoints should be agreed with the case officer assessing the planning application before the townscape, landscape and urban design appraisal is prepared. Chapter 2 and appendix 2 illustrate several key viewpoints.
- 3.19** Buildings with large or bulky forms can create silhouettes that block views of positive landmark buildings or introduce unsympathetic backdrops. Breaking up the massing to

create more slender building forms can help to minimise such impacts.

3.20 Tall building proposals should also explain how local views and vistas have influenced the design, including how specific views are framed, preserved or enhanced.

3.21 An important example of a key view in Bedford is the sightline from Bedford Castle Mound towards St Paul's Church (shown below). This view must remain unobstructed, and additional comparable examples are provided in Appendix 2.



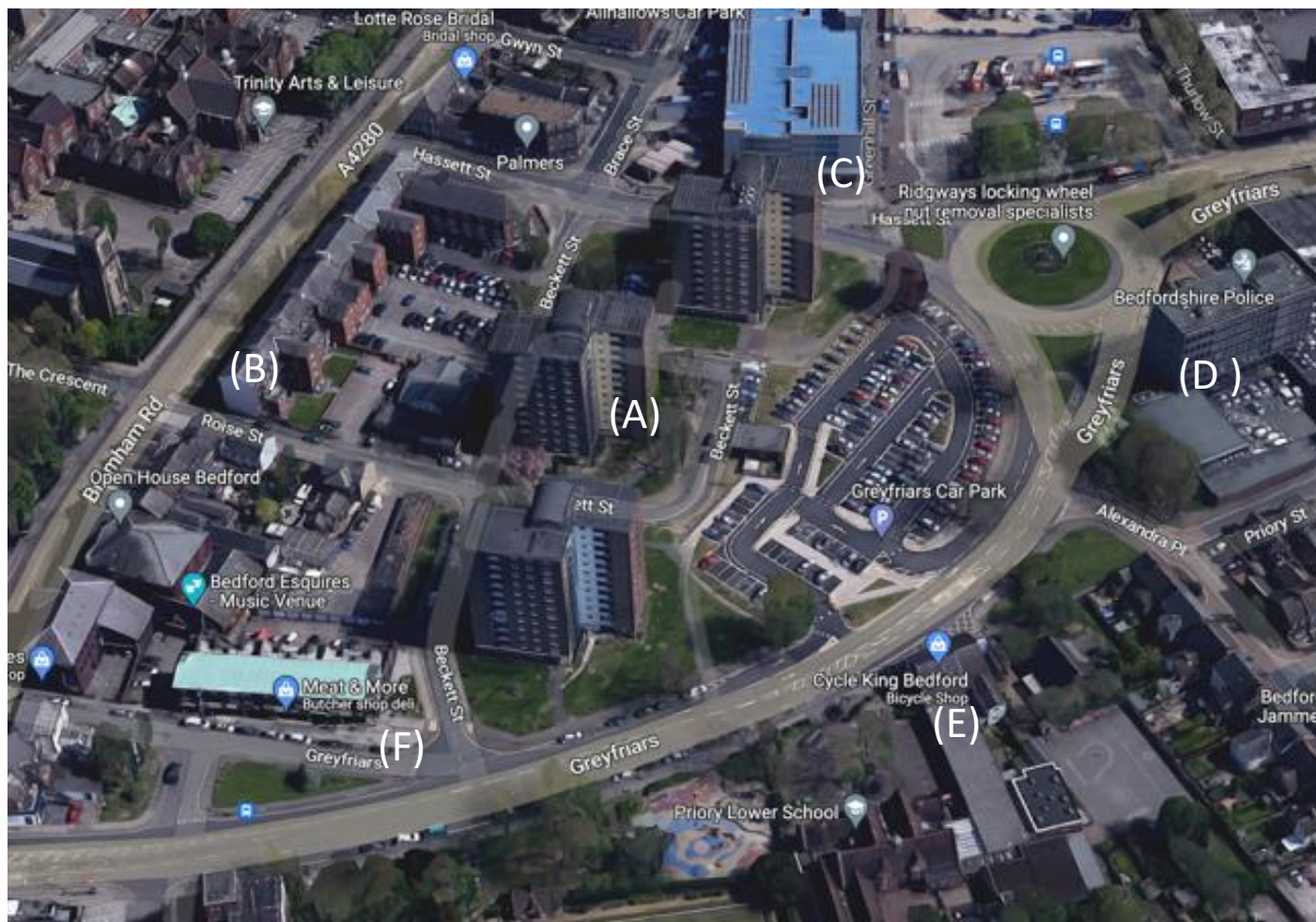
3.22 In assessing tall buildings, both storey height and floor-to-ceiling height will require careful consideration. The example shown below is a single storey building, but its large floor-to-ceiling height sets it apart from typical residential storey heights. Buildings must respond appropriately to scale, especially where buildings feature unusually tall internal spaces.



3.23 Building heights should also be harmonious. In the Bedford example below, the 12-storey tower blocks (A) sit alongside a range of other building types:

- historic buildings on Bromham Road, generally 3–4 storeys (B), including numerous listed buildings;
- a 6-storey car park including its roof level (C);
- the 6-storey police building (D);
- a 2-storey shop on Greyfriars (E); and
- 3-storey flats above shops (F).

3.24 These buildings exhibit a wide range of floor-to-ceiling heights across categories A-F.

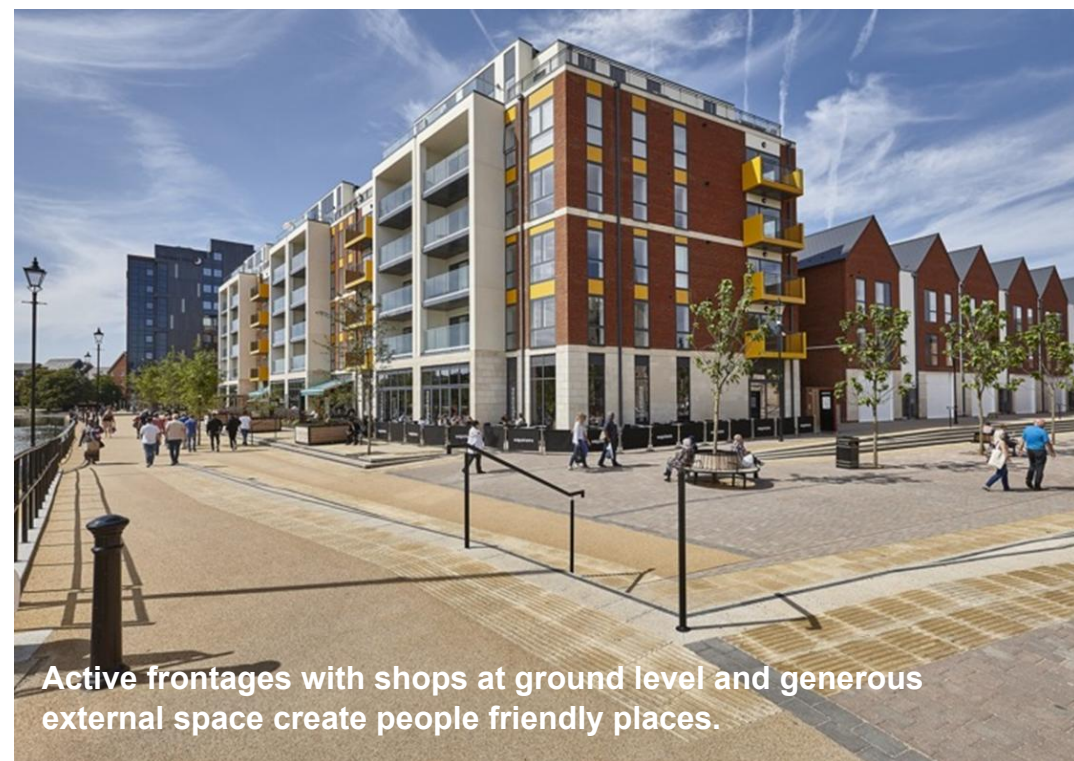


The example (A) illustrates a height variation from 2 to 12 storeys. Any new development in this area must acknowledge this diversity and respond sensitively to its context, delivering a scheme that is appropriate both to adjacent buildings and Bedford's character as an historic market town.

Criterion 3: Promote a sense of place to include attractive streets, squares and other public spaces with a defined sense of enclosure, with multifunctional green spaces and corridors.

- 3.25** The design of space around buildings is crucial in the creation of good public realm. Tall buildings need to be sensitively located so that they relate well to the space around them. Introducing a mix of uses within larger buildings can maintain activity throughout the day and into the evening, while also supporting natural surveillance of the public realm.
- 3.26** The public realm surrounding tall buildings should be proportionate to the building structure and designed to be attractive, safe, appropriately landscaped, well-lit and comfortable to sit in or move through, while connecting seamlessly with the wider public realm. Where appropriate, opportunities to create new public spaces and enhance local biodiversity should be explored as part of the development including through multifunctional green spaces and corridors. Public and private open spaces and amenity areas should not fall into shadow during significant parts of the day or year. Proposals must comply with the biodiversity net gain requirements set out in the Town and Country Planning Act 1990 (as amended). Consideration should also be given to the location and design of bin storage.
- 3.27** To function as good neighbours, tall buildings must be thoughtfully designed to minimise impacts on neighbouring properties, including loss of aspect, outlook or privacy (overlooking), loss of daylight and sunlight, overshadowing of gardens and noise.

- 3.28** Assessing the shading effects of tall buildings is crucial to ensure internal rooms, particularly at lower levels, receive adequate daylight, and that outdoor public spaces enjoy sufficient sunlight when weather permits. Public spaces should not be arranged in ways that leave them devoid of natural light; while not necessarily south-facing, they should still benefit from daylight and sunlight at appropriate times of the day to enhance their usability and comfort. It is important to understand the sun path around a site to create welcoming and accessible spaces where people can comfortably gather, relax and enjoy their environment.



Active frontages with shops at ground level and generous external space create people friendly places.

3.29 Tall buildings have the potential to influence the microclimate of the surrounding public realm through the diversion of wind. While tall buildings can offer shelter from prevailing winds, careful attention must be paid to prevent wind tunnelling effects, ensuring outdoor spaces remain comfortable and accessible.

Criterion 4: Safeguard the significance of heritage assets and, where appropriate, enhance their qualities, acknowledging that development within their settings could potentially cause harm. Proposals should achieve a successful relationship with the historic environment and the established character of the area in which it sits.

3.30 All tall building proposals must carefully consider how their height, scale and form may affect heritage assets. This requirement applies to statutory listed buildings, scheduled monuments, conservation areas and non-designated heritage assets. The scale and height of existing heritage assets should be fully considered when designing any new tall buildings within their setting.

3.31 Where tall buildings have the potential to affect the significance of heritage assets - through group value or through their relationship with the wider townscape and landscape - a proportionate heritage impact assessment and views analysis will be required in line with policy 41S of the Bedford Local Plan 2030.

3.32 Proposals must adhere to the requirements detailed in policy 41S in respect of the historic environment and heritage assets. Relevant Conservation Area Character Appraisals and Management Plans covering Bedford, Elstow and Biddenham should also inform the design process.

Criterion 5. Use a design code to ensure that the aesthetic, structural and environmental aspects of the tall buildings meet local standards and community expectations, agreed with the local planning authority.

3.33 Under policy 29 of Bedford Local Plan 2030, large-scale development should be guided through a design code. A design code is a set of simple, concise and illustrated design requirements (ideally expressed visually or numerically) to establish specific, detailed parameters that will shape the physical development of a site or area. It should be rooted in a clear shared vision, developed collaboratively with the local community during the engagement process to ensure new developments reflect local character, needs and preferences.

3.34 The design code should be prepared in advance of any planning application and agreed with the case officer from Bedford Borough Council during the pre-application process. For smaller scale development, instead of a design code, the design and access statement that accompanies the planning application should address the relevant criteria and existing national / local design codes.

3.35 Where a tall building may affect the setting of a conservation area or a listed building, the impact on the significance of those heritage assets must be understood to address statutory tests and national guidance. This will require a full understanding of the visual impact of the proposed development. A design code may not always be sufficient to assess the cumulative impacts of development to meet that requirement, so in some cases, a fully detailed scheme will be required.

Summary of the assessment criteria

Assessment criterion	Summary
<p>Criterion 1: Be of high-quality design in terms of scale, density, massing, height, materials and layout.</p>	<p>Planning applications should demonstrate through drawings, sections and models etc the design rationale of the building and how the form, materials and silhouette of the proposal will respond positively to the local context and skyline.</p>
<p>Criterion 2: Promote local distinctiveness and contribute to the townscape and landscape qualities of the area. They should have a positive relationship with the surrounding area, integrating well with and complementing the character of the area in which they are located.</p>	<p>Townscape, landscape and urban design appraisals required as part of a planning application should demonstrate by means of a visual assessment or appraisal with supporting visualisations and illustrations, how the proposal will sit within the existing landscape and townscape and describe the impact the development will have within the local and wider context.</p>
<p>Criterion 3: Promote a sense of place to include attractive streets, squares and other public spaces with a defined sense of enclosure, with multifunctional green spaces and corridors.</p>	<p>Planning applications should provide sufficient information to show how the new public realm relates to the wider streetscape and existing public realm. Applications should demonstrate the impacts of the proposal on neighbouring properties and open space, with designs that minimise any potential negative impacts.</p>
<p>Criterion 4: Safeguard the significance of heritage assets and, where appropriate, enhance their qualities, acknowledging that development within their settings could potentially cause harm. Proposals should achieve a successful relationship with the historic environment and the established character of the area in which it sits.</p>	<p>Planning applications with the potential to affect heritage assets must demonstrate a clear understanding of their significance and present a design that responds appropriately to the wider historic environment. This includes careful consideration of the building's location, form, height, scale, massing, relationship with surrounding buildings, views, impact on the urban grain and proposed materials.</p>
<p>Criterion 5: Use a design code to ensure that the aesthetic, structural and environmental aspects of the tall buildings meet local standards and community expectations, agreed with the local planning authority.</p>	<p>Planning applications relating to significant developments should follow a pre-established design code, created in collaboration with the local community and approved through Bedford Borough Council. In situations where a tall building could affect the significance of heritage assets, a comprehensive detailed scheme may be required to enable accurate assessment of the visual and cultural impacts of the scheme.</p>

Other considerations

- 3.36** Tall building proposals should comply with aviation and navigation operational requirements and not interfere to an unacceptable degree with telecommunication, television and radio transmission networks.
- 3.37** As well as the advice set out in this document, reference should be made to existing general design guidance, including design codes and guides. In particular, the Bedford Borough Design Guide (published in 2023) sets out several design principles to guide the scale and layout of development proposals and builds on the National Design Guide.

4 Conclusions

- 4.1** Bedford is a pre-dominantly low-lying town characterised by buildings of modest scale. There is, however, a scattering of taller buildings (as evident in the photographs presented in chapter 3) that punctuate the skyline in certain locations.
- 4.2** Development should favour low-to-mid-rise forms that reinforce Bedford's overall height context and its established character, while recognising that taller buildings may be appropriate where their siting, design quality and townscape impact are demonstrably positive.
- 4.3** The height and massing of any tall building proposal must be strongly informed through a clear understanding of the site's context and setting and must avoid harm to heritage assets. Development should also respond appropriately to existing site topography.
- 4.4** Where new development exceeds the height of neighbouring buildings, upper floors should ideally be set back to provide a gradual transition in height and relate more comfortably to existing frontages and parapet lines.
- 4.5** The level of supporting information required in relation to tall building proposals will depend on site-specific circumstances and potential impacts, and no fixed list of assessments is prescribed. Where significant townscape, visual, or heritage effects may arise, applications should include proportionate supporting material, such as visual or heritage assessments and verified visual representations. Visibility assessments, including a zone of theoretical visibility, may be required to inform viewpoint selection. The scope of assessment should be agreed through early pre-application engagement and remain proportionate to the proposal.



5 Appendices

5.1 Alongside this guide a set of appendices have been prepared, covering the following areas:

Appendix 1: Tall buildings locations in Bedford urban area.

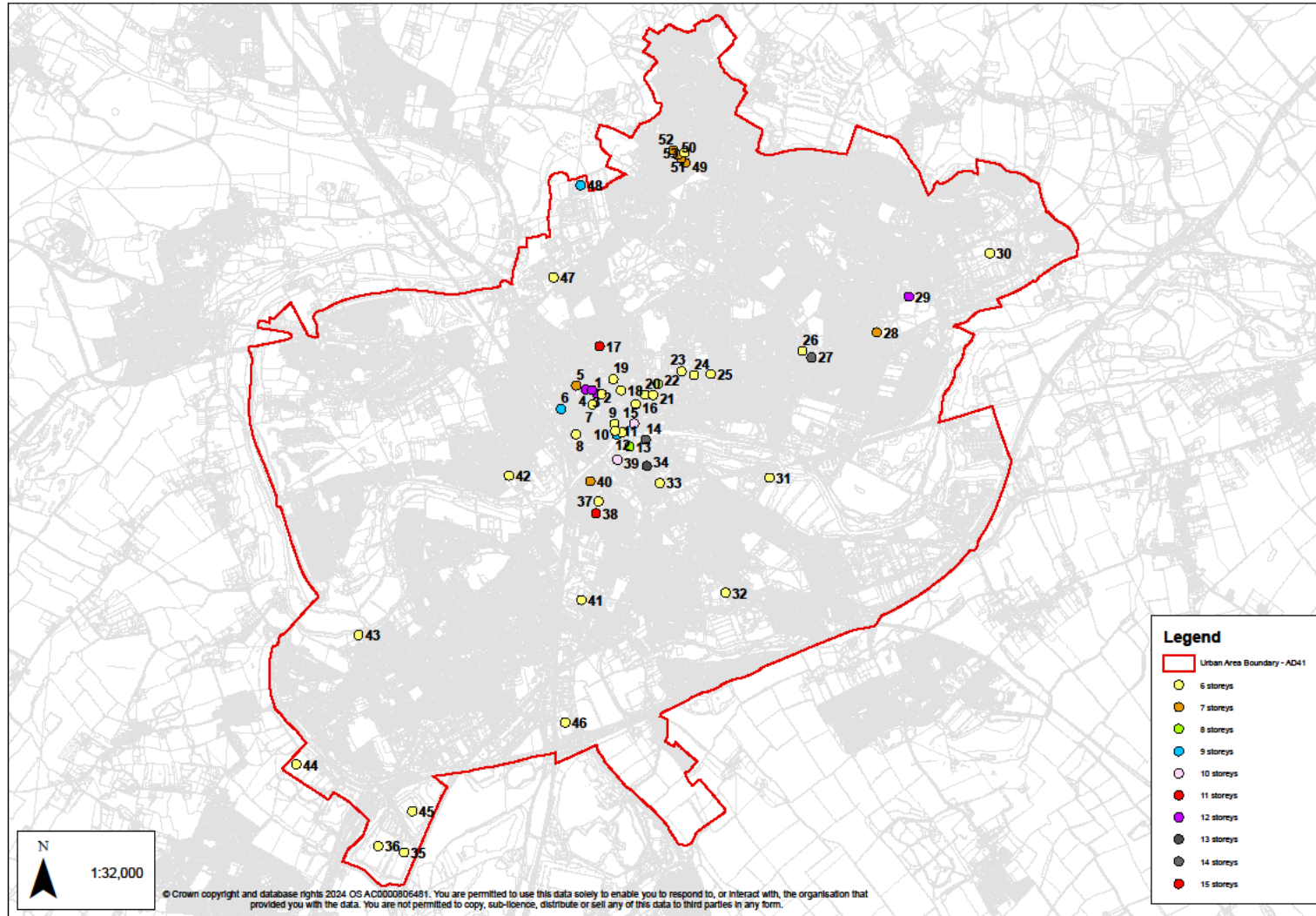
Appendix 2: A set of three urban area case studies assessed as follows:

- 1 Quality of external space at ground level - as building higher can provide the opportunity to provide additional ground level amenity space.
- 2 Quality of the built form and composition - how harmonious are external walls, windows and balconies and what is the quality of the materials used.
- 3 Skyline and relationship to existing built heritage - impact on the skyline is critical and how effectively it responds to local context and heritage.

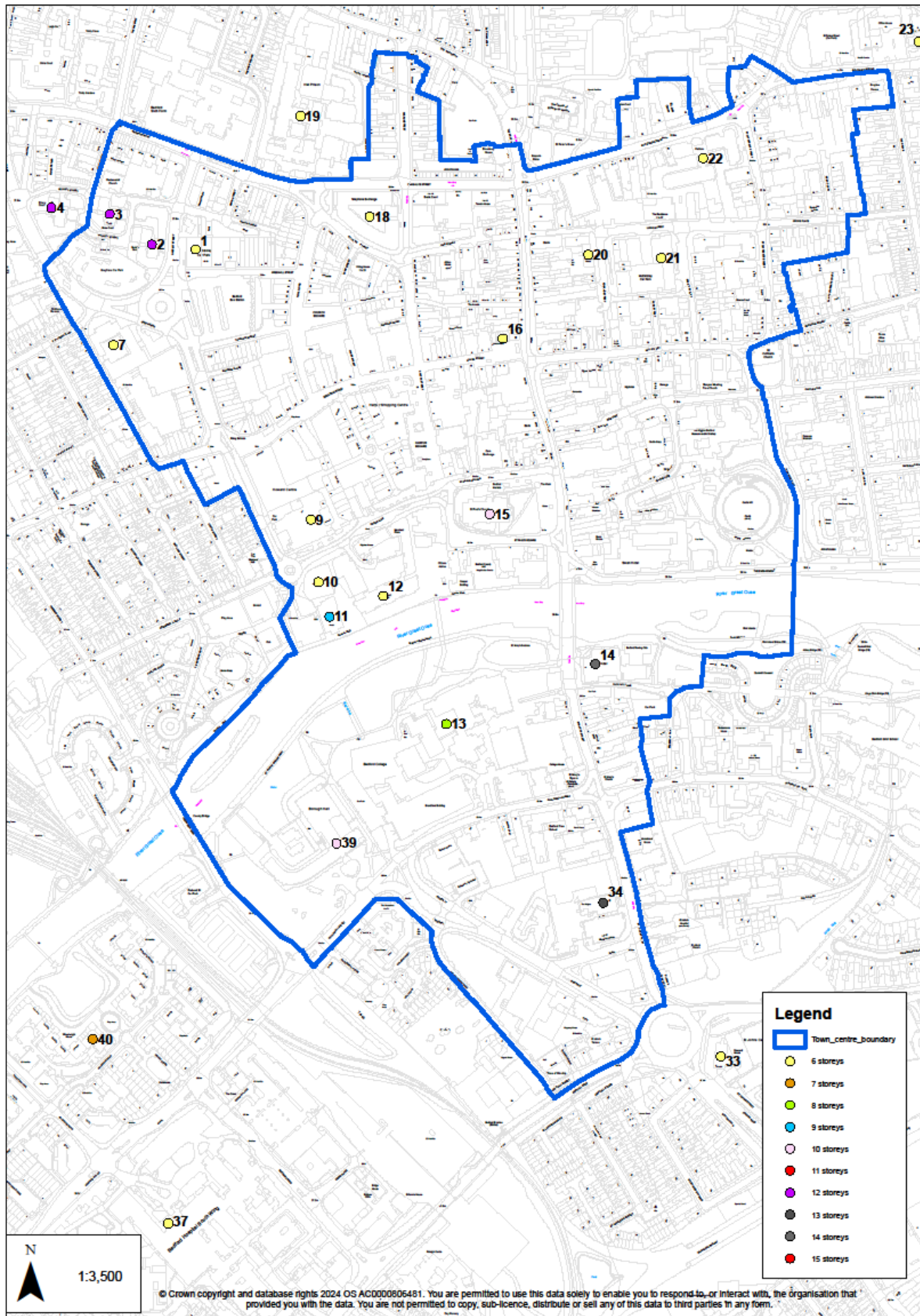
5.2 The three case studies highlight the poor quality of tall buildings in the Bedford urban area - providing visible evidence of the level of care required when designing structures that will be prominent on the skyline.



Map 1 - Tall building locations in the urban area of Bedford as at March 2025



Map 2 - Tall building locations in the town centre as at March 2025



List of tall buildings

Number	Address	Storeys
1	Allhallows car park	6
2	Beckett Court Greyfriars	12
3	Roise Court	12
4	Priory Court	12
5	Conduit Court, Greyfriars	7
6	Ashburnham Court, Ashburnham Road	9
7	Old Greyfriars Police Station	6
8	Royal Mail delivery centre	6
9	River St car park	6
10	Bedford Riverside cinema etc	6
11	Premier Inn, Horne Lane	9
12	Merchant Gate	6
13	Bedford College, Cauldwell Street	8
14	Mercure Hotel	14
15	St Paul's Church spire	10
16	Silver Street building	6
17	Boswell Court, Tavistock Court & Richbell Court	15
18	Telephone Exchange, St Loyes St	6
19	Bedford Prison	6
20	9 Howard St	6
21	Lurke Street multi storey car park	6
22	Platform St Peter's St	6
23	Zurich House, Goldington Road	6
24	Heron House, Goldington Road	6
25	Old Portman House, Goldington Road	6
26	University of Bedfordshire, Polhill Avenue	6
27	University of Bedfordshire	14
28	Heron Heights, Goldington Green	7
29	Bury Court, Church Lane	12
30	16 Edison Road	6
31	Oasis Beach Pool	6
32	Richardson Milling, London Road	6
33	St John's Street office building	6
34	BT Tower, Kingsway	13
35	Sainsburys Distribution Centre	6
36	Argos Distribution Centre	6
37	Bedford Hospital South Wing	6
38	Samsons House, Endsleigh Road	11
39	Borough Hall	10
40	Wheelright House	7
41	Technology House, Ampthill Road	6
42	Bedford Gurdwara	6

43	Mill Lane Apartments, Kempston	6
44	Bell Farm buildings	6
45	Asda Distribution Centre	6
46	Movianto, Progress Park	6
47	Woodlands, Manton Lane	6
48	Aircraft Research Association, Manton Lane	9
49	Frampton Court, Severn Way	7
50	Upton Court, Severn Way	7
51	Leighton Court, Severn Way	7
52	Westbury Court, Severn Way	7
53	Evesham Court, Avon Drive	6

Case studies

The following case studies have been undertaken using the assessment criteria from section 3 of the guide to analyse a number of existing tall buildings in the Bedford urban area. These are:

1. Greyfriars blocks
2. BT Tower (The Heights)
3. Mercure Hotel (former Park Inn)

The location of these is shown on the map below:



Existing tall buildings analysis: method

The analysis of tall buildings highlights their impact on the town and the lessons that can be drawn from them. Each case study is presented in a common format analysing:

- **quality of external space at ground level** as building higher can provide the opportunity to provide additional ground level amenity space.
- **quality of the built form** and composition - how harmonious are external walls, windows and balconies and what is the quality of the materials used.
- **skyline and relationship to existing built heritage:** Impact on the skyline is critical, together with how well the tall building responds to local context / heritage.

The analysis ends with the key lessons learned relating to each tall building, along with a summary organised around the five assessment criteria in section 3 of the guidance. These are:

Criterion 1: Be of high-quality design in terms of scale, density, massing, height, materials and layout.

Criterion 2: Promote local distinctiveness and contribute to the townscape and landscape qualities of the area. They should have a positive relationship with the surrounding area, integrating well with and complementing the character of the area in which they are located.

Criterion 3: Promote a sense of place to include attractive streets, squares and other public spaces with a defined sense of enclosure, with multifunctional green spaces and corridors.

Criterion 4: Safeguard the significance of heritage assets and, where appropriate, enhance their qualities, acknowledging that development within their settings could potentially cause harm. Proposals should achieve a successful relationship with the historic environment and the established character of the area in which it sits.

Criterion 5: Use a design code to ensure that the aesthetic, structural and environmental aspects of the tall buildings meet local standards and community expectations, agreed with the local planning authority.

The case studies conclude with an overall summary in section 4 which identifies common findings across the analyses. Images below include images from Google maps.

1. Greyfriars blocks

1.1 Quality of external space at ground level



Image 1: Greyfriars from the south looking north

One of the potential benefits of taller buildings is the opportunity to create more public space at ground level. This has proved to be the case at Greyfriars north where the three tower blocks (image 1) have considerable public space to the south at ground level.



Image 2: Greyfriars aerial view

As image 2 shows, the public space mainly comprises large areas of car parking (CP) with significant hardstanding and relatively little to break the monotony of the continuous parking bays. The area around the Greyfriars blocks does include significant green infrastructure (GI) but this is

relatively ill defined and does not serve to aid the legibility of the site – accepting that some of the trees might have been existing and their location fixed.

LESSON 1: If a justification for building taller is to increase the amount of public space at ground level, then this must be of the highest quality. A well defined, legible public space should be provided.

1.2 Quality of the built form



Image 3: Greyfriars block from ground level.



Image 4: side elevation

Building taller inevitably means that the new building will be more prominent. Repetitive elements such as windows and balconies offer the opportunity to provide harmony if done well but monotony if done badly. At Greyfriars there is an unusual approach to fenestration, comprising very small square windows at ground level, together with larger pairs of square windows to each flat. There are larger four-pane windows to each flat above the entrance area. Balconies provide some depth to the elevation but, being fully recessed with the outside edge aligning with the outside of the building, they create relatively dark recesses to the building. This, combined with an essentially flat brick façade, results in a weak overall composition.



Image 5: Typical Greyfriars block entrance

Small windows (SW) at ground level do not contribute to a welcoming approach to the blocks. This, coupled with a set back entrance area (EA) and bars on the doors, creates a poor impression overall.

LESSON 2: Consider the overall harmony of the tall building elevation(s). Ensure windows, doors (including balcony doors) and articulation of the façade work together to create a harmonious composition. Entrance areas should be welcoming. They may be set back but ensure the design

draws you in and doesn't create a feeling of 'no entry'. Door and window design in entrance areas should ideally give a glimpse of what is beyond, and good lighting can add warmth and depth.

1.3 Skyline and relationship to existing built heritage



Image 6: Greyfriars block from Bromham Road

The impact of the Greyfriars blocks is reduced due to the change in levels, distance and perspective from the heritage assets on Bromham Road - as illustrated in image 6 above. However, the scale is such that it still represents a significant imposition on the skyline, quite out of proportion with the scale of the heritage assets. The visual relationship to the characterful existing neighbouring / historic buildings in the foreground is generally poor and causes harm.

LESSON 3: The new skyline created by a tall building can serve to accentuate poor design scale and quality. Tall buildings must be of high-quality design and pay particular attention to scale, design and finishes to avoid harmful impacts on the significance of heritage assets.

1.4 Greyfriars assessment

Assessment criterion	Greyfriars Blocks
Criterion 1: Be of high-quality design in terms of scale, density, massing, height, materials and layout.	Quality of built form analysis highlights the overall lack of criterion 1 'high-quality design'.
Criterion 2: Promote local distinctiveness and contribute to the townscape and landscape qualities of the area. They should have a positive relationship with the surrounding area, integrating well with and complementing the character of the area in which they are located.	Skyline analysis indicates a poor response to the Greyfriars blocks relationship with the surrounding area. No meaningful response to local character.
Criterion 3: Promote a sense of place to include attractive streets, squares and other public spaces with a defined sense of enclosure, with multifunctional green spaces and corridors.	Quality of external space at ground level analysis highlights in particular a lack of clearly defined space and enclosure to the south of the three tall buildings.
Criterion 4: Safeguard the significance of heritage assets and, where appropriate, enhance their qualities, acknowledging that development within their settings could potentially cause harm. Proposals should achieve a successful relationship with the	Relationship to existing built heritage illustrates that the Greyfriars Blocks harms the setting and significance of the heritage assets in the area.

historic environment and the established character of the area in which it sits.	
Criterion 5: Use a design code to ensure that the aesthetic, structural and environmental aspects of the tall buildings meet local standards and community expectations, agreed with the local planning authority.	A new proposal to redevelop Greyfriars North is in the process of being finalised and a development brief including Design Code has been approved.

2. BT tower (The Heights)

2.1 Quality of external space at ground level



Image 7: View of railings, car park and 'The Heights' from Kingsway Link

External space adjacent to The Heights is primarily given over to car parking. The car park is screened by mature trees and bounded by railings.



Image 8: View of the car park entrance from Kingsway Link

The entrance area to The Heights car park comprises random car parking and a continuation of the railings with gated entrance. Mature trees line the western edge of the car park.

LESSON 4: There appears to be uncontrolled parking at the car park entrance to 'The Heights', which creates a very poor external space with visual clutter and associated poor sense of arrival. This is reinforced by the poor maintenance of the railings. Arrival points at tall buildings set the standard for all other external space and must be of the highest quality.

2.2 Quality of the built form



Image 9: End elevation 'The Heights'.

The end elevation of The Heights illustrates the use of pre-cast concrete panels with glazing infill. Repetition is evident with two identical vertical facades with continuous vertical glazing between.



Image 10: The Heights with Meridian House in the foreground

The south facing elevation shows the same repeated facade of the end elevation. In addition, part of the elevation has small square windows running continuously up the building and a set back top floor with roof canopy oversailing the external walls.

There is a degree of harmony between The Heights and Meridian House (in the foreground) in terms of the colour palette of materials chosen. Meridian House has distinctly less glazing and a different architectural form with grey and white pre-cast concrete panels. The immediate context is primarily 'modern' and in that sense The Heights shows a degree of alignment with its immediate neighbour.

LESSON 5: This is an out and out contemporary building and deploys modern building materials with high degrees of repetition. The top floor is set back with a roof that oversails the external walls. Whilst not 'high' design the building does have a consistency of appearance although the overall impression is of blandness.

2.3 Skyline and relationship to existing built heritage



Image 11: The Heights looking south along St Johns Street

The Heights creates a significant imposition on the Bedford skyline from St John's Street looking south. The north facing elevation does not significantly benefit from the top floor set back i.e it does little to add finesse to the building. The overall impression is of a bland box. Neighbouring buildings in the foreground are not of great architectural quality, comprising brick and tiled external finishes. These sit uneasily with The Heights.



Image 12: The Heights looking north along St Johns Street

Looking north along St John's Street towards the south facing elevation, The Heights has a slight variation from the north façade with smaller windows repeated vertically. The skyline imposition is significant. Meridian House has a degree of harmony with the colour palette of The Heights with white (and grey) pre-cast concrete panel horizontal banding. Further along St Johns Street heading south is a single storey brick building with slate tiled roof and metal windows. This sits uneasily with The Heights and Meridian House.

LESSON 6: A large 'box' of a building (such as The Heights) will never be a welcome addition to the skyline. Due to its height, form and massing, The Heights also detracts from views of the tower of St John's Church and diminishes its landmark value along St John's Street. Whilst contextually The Heights sits reasonably well with its immediate neighbour – Meridian House – other nearby buildings are predominantly brick. This makes The Heights an uneasy fit with the broader context. Designing a block in isolation without due regard and respect for the wider context has delivered an imposing building that does not sit well with the nearby historic character.

2.4 BT Tower (The Heights) assessment

Assessment criterion	BT Tower (The Heights)
Criterion 1: Be of high-quality design in terms of scale, density, massing, height, materials and layout.	Quality of built form analysis highlights a degree of consistency in the development block between The Heights and Meridian House in terms, for example, of the colour palette of materials used. However, its distinctly inappropriate scale, mass and height result in an unwelcome addition to this part of Bedford.
Criterion 2: Promote local distinctiveness and contribute to the townscape and landscape qualities of the area. They should have a positive relationship with the surrounding area, integrating well with and complementing the character of the area in which they are located.	Skyline analysis indicates a palette of modern materials that is at odds with the historic local distinctiveness of the area. A degree of complementarity with its immediate neighbour – Meridian House – belies the historical and more recently constructed building heights of 2, 3 and 4 storeys.
Criterion 3: Promote a sense of place to include attractive streets, squares and other public spaces with a defined sense of enclosure, with multifunctional green spaces and corridors.	Quality of external space at ground level analysis highlights a lack of good quality public space. The adjacent space is used as car parking, heavily screened with mature trees. Public space along St Johns Street consists mainly of pavement, and there is no meaningful or usable public space around The Heights.
Criterion 4: Safeguard the significance of heritage assets and, where appropriate, enhance their qualities, acknowledging that development within their settings could potentially cause harm. Proposals should achieve a successful relationship with the historic environment and the established character of the area in which it sits.	Relationship to existing built heritage illustrates a problem. Meridian House provides a modern immediate neighbour, while the wider context consists of modest 2–4 storey buildings and nearby historic churches. Against this backdrop, The Heights introduces harm to the setting and significance of surrounding heritage assets.”
Criterion 5: Use a design code to ensure that the aesthetic, structural and environmental aspects of the tall buildings meet local standards and community expectations, agreed with the local planning authority.	The building has been recently refurbished and there are no plans to redevelop this site, but some important lessons can be learned from the analysis (above).

3. Mercure Hotel (former Park Inn)

3.1 Quality of external space at ground level



Image 13: View of Mercure from Duck Mill Lane

Much of the external space adjacent to the Mercure is given over to guest parking (GP). There are several mature trees between the guest parking and Duck Mill Lane which serve to reduce the impact of large areas of hardstanding. Overall, the external space adjacent to the Mercure is functional and landscaped.



Image 14: Public space on the north side of the Mercure

On the River Great Ouse (north) side of the Mercure hotel the riverside restaurant and public walkway provide reasonably attractive urban spaces for walkers and cyclists. The quality of the hotel building in isolation and impact on the skyline is analysed below.



Image 15: External space adjacent to the Mercure (north side)

On the north elevation the Mercure is dominated by an uninviting and bland external appearance with white doors. There does not appear to be a significant effort at good place making external to the hotel (see image 15 left). This contrasts with the elegant and inviting external space to the neighbouring building (image 15 right) comprising balconies and colonnade with sheltered walkway in front of the building.



Image 16: View looking north from the public space in front of the Mercure

The view north from the front of the Mercure hotel north across the river is of very high quality. Church spire, river, bridge and some outstanding existing buildings and greenery make this an iconic view.

LESSON 7: When external space and views around buildings are analysed in isolation they can appear very positive. The Mercure is an example of this where external space at ground level, views and amenity space such as car parking appear reasonably well designed apart from the immediate vicinity of the hotel on the north side. It is important to balance out this analysis with the quality of built form and skyline and relationship to built heritage analysis (see below).

3.2 Quality of the built form



Image 17: North elevation of the Mercure hotel. Hotel entrance

This is undoubtedly a building utilising 'modern' material (above left) - cladding, pre-fabricated concrete panels, large spans. At ground level white doors are visible but do not provide a positive impression because they stand out uncomfortably from the rest of the elevation. Above that, two levels of highly glazed elevation will undoubtedly provide great views of the river for those looking out but sit uneasily with the surrounding context and the composition of the hotel façade above and below. Above that, pre-cast concrete panels and linear glazing dominate. The hotel entrance (image 17 right) on St Mary's Street has depth, functionality and formality but in a fairly banal materials setting.

LESSON 8: Analysed in isolation the choice of materials is poor. Pre-cast concrete panels lack finesse, have not aged well and provide a harsh framework for non-descript glazing. Very different floor to ceiling glazing at intermediate level looks incongruous with the glazing described above. At ground (river level) the building is uninviting. The overall composition is disharmonious and lacking any finesse.

3.3 Skyline and relationship to existing built heritage



Image 18: Mercure skyline

The buildings present a significant imposition on the Bedford skyline (see images 18 and 19). The prefabricated concrete panels portion of the hotel lacks any finesse, is very regular in form and provides an unwelcome addition to the Bedford skyline.



Image 19: View looking south of the Mercure from the north bank of the River Great Ouse showing built heritage context

Adjoining the Mercure is a good quality historic building occupied by Bedford Rowing Club (BRC) which includes a riverside bar. Three gable ends serve to break down the scale of the Rowing Club building. A balcony provides external amenity space and a degree of shelter beneath for rowing club users and walkers. Materials comprise render, timber fascias and detailing, steel columns and balustrading, timber balcony and a brick plinth at ground level. In contrast, none of the qualities of this historic building are reflected in the design of the Mercure, where concrete, glass and prefabricated panels dominate. The overall composition of the building lacks any harmony and in relation to its neighbours.

LESSON 9: A building that deploys modern materials with no apparent acknowledgement of its historic neighbours must be designed exceptionally well as it will inevitably stand out. The Mercure does not achieve this and has an uneasy mix of modern materials assembled in an unattractive riverside elevation with an associated perceived imposition on the Bedford skyline.

3.4 Mercure (former Park Inn) assessment

Assessment criterion	Mercure (former Park Inn)
Criterion 1: Be of high-quality design in terms of scale, density, massing, height, materials and layout.	Quality of built form analysis highlights a palette of modern materials that do not sit well with the hotel’s historic neighbours. Poor scale and massing sit uneasily on the Bedford skyline. Lack of apparent access at ground level with the Mercure entrance a level up.
Criterion 2: Promote local distinctiveness and contribute to the townscape and landscape qualities of the area. They should have a positive relationship with the surrounding area, integrating well with and complementing the character of the area in which they are located.	Skyline analysis indicates a very poor relationship with the neighbouring townscape and fails to make a positive relationship with the surrounding area. It disappointingly fails to acknowledge the local character illustrated by, for example the Bedford Rowing Club building next door, with its gables breaking down scale and harmonious palette of materials.
Criterion 3: Promote a sense of place to include attractive streets, squares and other public spaces with a defined sense of	Quality of external space at ground level analysis highlights that adjacent space is necessarily given over to car parking and this is set in a strong green infrastructure setting with

enclosure, with multifunctional green spaces and corridors.	a number of mature trees. The north side of the building looks on to the River Great Ouse and provides amenity space for walkers and cyclists.
Criterion 4: Safeguard the significance of heritage assets and, where appropriate, enhance their qualities, acknowledging that development within their settings could potentially cause harm. Proposals should achieve a successful relationship with the historic environment and the established character of the area in which it sits.	Relationship to existing built heritage illustrates a high-quality historic setting with a neighbouring historic building where the scale is broken down using three gable ends onto the river. A harmonious palette of materials includes timber, render and slate. The Mercure with its distinctly different and modern materials including pre-cast concrete and large areas of glazing does not integrate well with the historic environment and character and causes high levels of harm.
Criterion 5: Use a design code to ensure that the aesthetic, structural and environmental aspects of the tall buildings meet local standards and community expectations, agreed with the local planning authority.	There are no plans to redevelop this site, but some important lessons can be learned from the analysis (above). If this site were to be redeveloped a design code would be beneficial to acknowledge an outstanding existing setting and set parameters for a new building which would integrate well with its surroundings.

4.0 Summary

The shared findings across the three tall buildings analysed are outlined below.

Quality of external space at ground level

The different uses of the buildings: residential (Greyfriars Blocks and The Heights) and hotel guests (Mercure) predictably have car parking as the dominant external space at ground level. At Greyfriars the public car park comprises a large area of hardstanding with not enough breaking down of the space into more manageable areas and a lack of well-designed green infrastructure to break the monotony of hard standing. This is less apparent at The Heights and Mercure where green infrastructure provides a high level of screening of the car parks from public spaces beyond. However, at The Heights ill-defined car parking creates a poor impression on arrival. The overall lesson from this analysis is the importance of appropriate care being afforded to the design of external space comprising pure functionality such as car parking.

Quality of the built form

The elevations of the Greyfriars Blocks comprise high degrees of repetition vertically. On close inspection the fenestration has an uneasy variation in glazing sizes and a relatively unwelcoming entrance area. Balconies are fully recessed into the building and appear dark and uninviting from the outside. Both The Heights and the Mercure utilise pre-cast concrete panels externally and, at this scale and degree of repetition, amount to unattractive finishes. It is difficult to comment on their durability / quality without seeing materials up close and gaining access to the buildings to view material finishes from the inside. The overarching conclusion from the analysis of the three tall buildings is of architectural design, scale and materials that lack the quality of built form to provide appropriate additions to the Bedford urban area.

Skyline and relationship to existing built heritage

All three tall buildings constitute unwelcome additions to the Bedford skyline. Out of scale with neighbours and generally comprising unattractive material finishes they all lack the quality and finesse to justify inclusion at scale. Perhaps the most problematic part of the analysis is the relationship of the tall buildings to the existing built heritage. The Mercure adjoins the building that houses the Bedford Rowing Club and pays no apparent respect to its scale, high quality finishes and level of amenity including balconies.

The Heights has a more positive relationship to its immediate neighbour – Meridian House – but analysing the broader context suggests a very uneasy ‘fit’.

Within the broader context, existing development remains modest in height, largely comprising 2, 3 and 4-storey buildings, alongside several nearby historic churches. At the Greyfriars blocks, scale reduces through perspective in the view from Bromham Road, yet the impact on the Bedford skyline remains unmistakable.

Key analysis headings summarised



Greyfriars blocks

Quality of external space at ground level **POOR**

Quality of the built form **POOR**

Skyline and relationship to existing built heritage **POOR**



Mercure Hotel (former Park Inn)

Quality of external space at ground level **AVERAGE**

Quality of the built form **POOR**

Skyline and relationship to existing built heritage **POOR**



BT Tower (The Heights)

Quality of external space at ground level **AVERAGE**

Quality of the built form **POOR**

Skyline and relationship to existing built heritage **POOR**

Appendix 3

Bedford Borough Design Guide

Local distinctiveness areas

x4 light blue (1AU-1DU) – conservation areas

x19 orange (2AU-2SU) – 19th / early 20th century residential development

x16 yellow (3AU-3MU) – Suburban residential development: 1950 – 1980 (predominantly semi-detached / terraced)

x3 pink (4AU-4CU) – Residential development: 1950 – Present (Larger, detached dwellings on larger plots)

x25 purple (5AU-5WU) – Newer / recent residential development: 1980 – present (predominantly larger urban extensions)

