

**BEDFORD BOROUGH COUNCIL**

**DECISION NO.** 1161

**RECORD OF EXECUTIVE DECISION TAKEN BY AN EXECUTIVE MEMBER OR OFFICER**

This form can be used for any decision but **MUST** be used to record:

- any decision taken by the Elected Mayor or an individual Councillor
- a key decision taken by a Council Officer

In these circumstances the form must be completed and passed to the Head of Members' 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 days have passed and the Head of Members' Services has confirmed the decision has not been called in.

**1. Description of decision**

To approve the Issues and Options paper (**Appendix A**) for public consultation as part of the process of preparing the Bedford Borough Local Plan 2032.

To approve the Bedford Town Centre Discussion paper (**Appendix B**) for focussed consultation with key stakeholders.

**2. Date of decision**

**23rd** December 2013

**3. Reasons for decision**

In order to progress the preparation of the Bedford Borough Local Plan 2032 in accordance with the timetable set out in the revised Local Development Scheme.

**4. Alternatives considered and rejected**

There are no alternatives that allow progress in accordance with the requirements of the Planning Acts and the Localism Act.

**5. How decision is to be funded**

It is anticipated that the costs of preparing the plan will be met from existing budgets and from a call on the Plans and Strategies Reserve. There will be a need to top-up reserve funding by approximately £70,000 and this will be considered as part of the 2014/15 budget process. As the plan progresses and detailed proposals become apparent consideration will need to be given to whether or not the Plan will lead to further expenditure for the Council or potential risk of expenditure.

**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)

The Mayor has been consulted on this decision

Signed DM Hodgson Date 23rd December 2013

Name of Decision Taker MAYOR DAVE HODGSON

**This is a public document. A copy of it must be given to the Head of Members' Services as soon as it is completed.**

Date decision published: 24.12.13

Date decision can be implemented if not called in: 7.1.14

**Bedford Borough Council – Report to the Mayor**

December 2013

**Report by:** Assistant Director Planning, Strategic Transport & Housing

**Subject:** BEDFORD BOROUGH LOCAL PLAN 2032

**1. Executive Summary**

Work has now commenced on the preparation of a new Local Plan for the borough to identify and meet future needs for new homes, jobs and other uses up to 2032. The first stage in the plan making process is the identification of issues facing the borough and options to deal with these. An Issues and Options paper is included as **Appendix A** and it is proposed that this is made available for public consultation in the New Year. A Town Centre Discussion paper has also been produced (**Appendix B**) to explore the particular issues facing the town centre and it is intended that this will be the subject of a separate focussed consultation with key stakeholders.

**2. Recommendations**

**2.1 That the Mayor considers, and if satisfied:**

**(a) Approves the Issues and Options paper set out at Appendix A for public consultation;**

**(b) Approves the Bedford Town Centre Discussion paper set out at Appendix B for focussed consultation with key stakeholders.**

**(c) Authorise the Assistant Director (Planning, Strategic Transport & Housing) to make minor editorial textual changes to the Issues and Options paper and the Bedford Town Centre Discussion paper.**

**3. Reasons For Recommendations**

**3.1 In order to progress the preparation of the Bedford Borough Local Plan 2032 in accordance with the timetable set out in the Local Development Scheme.**

## 4. Key Implications

### Legal Issues

- 4.1 The Government's National Planning Policy Framework (NPPF) was published in March 2012. One of the core planning principles set out in that document is that planning should be genuinely plan-led and that plans should be kept up to date. Plan preparation will need to be undertaken in the context of the NPPF, supporting guidance and the new Local Plan system introduced by the Localism Act.

### Policy Issues

- 4.2 In the planning context, the starting point for decision making is the need to have regard to the provisions of the development plan. In the Borough's case, the 'development plan' comprises a number of documents. These include:-

- The Bedford Borough Local Plan (adopted 2002) – This contains a number of 'saved' policies which are in need of review. Many of these are development management policies which were originally intended to be reviewed in a separate development plan document. The new Local Plan now provides the conduit for that review.
- The Core Strategy and Rural Issues Plan (adopted 2008).
- The Bedford Town Centre Area Action Plan (adopted 2008).
- The Allocations and Designations Local Plan (adopted 2013).

The last three of these documents meet the Borough's needs up to 2021 and have just over seven years left to run. Consideration will need to be given to which parts of those documents will need to be reviewed as part of the new Local Plan process. Given that the Allocations and Designations Local Plan has only recently undergone examination, it is anticipated that the majority of that plan's policies and proposals will not be reviewed at this time.

- 4.3 At the heart of the NPPF is a presumption in favour of sustainable development. For 'plan-making' the NPPF states that this means that local planning authorities should positively seek opportunities to meet the development needs of their area. Local Plans should meet these objectively assessed needs, with sufficient flexibility to adapt to rapid change. Plans which are found not to have met the local needs of their area could be found to be unsound at examination.

- 4.4 Having identified what the needs are, the NPPF says that Local Plans should:-

- i) Plan positively for the development and infrastructure needed in an area.
- ii) Be drawn up over an appropriate timescale, preferably a 15 year time horizon.
- iii) Be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations.
- iv) Indicate broad locations for strategic development, allocate sites and identify land where development would be inappropriate.

### Resource Implications

- 4.5 It is anticipated that the costs of preparing the plan will be met from existing budgets and from a call on the Plans and Strategies Reserve. There will be a need to top-up reserve funding by approximately £70,000 and this will be considered as part of the 2014/15 budget process. As the plan progresses and detailed proposals become apparent consideration will need to be given to whether or not the Plan will lead to further expenditure for the Council or potential risk of expenditure.

### Risk Implications

- 4.6 Failure to progress a new Local Plan will mean that planning policies would not be reviewed and kept up to date and the Council would be seen as failing to meet its objectively assessed needs. This would undermine efforts to encourage growth in jobs and economic development, weaken the Council's position at planning appeals and could result in unplanned speculative development in non-preferred locations. It would also contradict the commitment given by Officers at the Allocations and Designations Plan Examination that the Council will progress the new Local Plan as soon as possible.

### Environmental Implications

- 4.7 A Sustainability Appraisal of the new Local Plan will be carried out at each stage of the plan making process. An initial scoping consultation had been carried out with the Strategic Environmental assessment (SEA) bodies in advance of preparing the Issues and Options paper. The Issues and Options paper has also been subject to Sustainability Appraisal. This can be viewed at [www.bedford.gov.uk/localplan2032](http://www.bedford.gov.uk/localplan2032). The plan will also need to be in accordance with relevant planning and environmental regulations.

### Equalities Impact

- 4.8 The report has been compiled with consideration to the Bedford Borough Council's statutory Equality Duty to eliminate unlawful discrimination, advance equality of opportunity and foster good relations, as set out in Section 149(1) of the Equality Act 2010.
- 4.9 Recommendations (a) and (b) have been subject to a Level 1 equality analysis. In summary this states that a range of potential impacts both positive and negative have been identified. Negative effects on equality groups relate primarily to the environmental impacts of development, such as poor air quality, traffic and congestion or noise. These can be mitigated through the inclusion of appropriate policy criteria, where necessary, and proposals for mitigation are being developed as part of the sustainability appraisal of the Local Plan.

- 4.10 Seeking local views and input on a range of issues and setting out options for growth, the Issues and Options Paper and Town Centre Discussion paper have a wide range of potential positive effects on all equality groups. Significantly, they contribute to social equality in promoting inclusiveness and accessibility to provisions such as community centres, open spaces, employment and training opportunities, and in particular affordable housing. The groups that are likely to particularly benefit are those concentrated in or near the urban area and locations for growth. These are age groups, race and religious groups, mothers and mothers-to-be groups and those suffering deprivation.
- 4.11 Whilst the analysis has found that development resulting from the new Local Plan may potentially produce decreased environmental opportunity, particularly in growth locations, the range of positive effects and opportunities (social, economic and environmental) afforded to equality groups through growth orientated development are considered to substantially outweigh the negative impacts.
- 4.12 The analysis demonstrated that the Issues and Options paper and the Bedford Town Centre Discussion paper have taken all appropriate opportunities to advance equality and foster good relations between groups. Potential negative environmental effects on equality groups resulting from new development and growth should be appropriately mitigated. A copy of the Equality Analysis can be viewed at [http://www.bedford.gov.uk/community\\_and\\_living/equality\\_and\\_diversity/equality\\_analysis/env\\_sustainable\\_communities.aspx](http://www.bedford.gov.uk/community_and_living/equality_and_diversity/equality_analysis/env_sustainable_communities.aspx)

## 5. Details

- 5.1 There is now a need for the Council to prepare a new Local Plan to look beyond 2021. Consideration needs to be given to the time period the new Local Plan should cover and assess what the local needs will be in terms of housing and job growth over that period. Obviously the longer the plan period, the higher the housing and job growth targets will be. The reliability of forecasts also decreases as the forecasting period is extended. Providing a plan up to 2032 would satisfy the need for a 15 year plan without having to accommodate much larger growth targets associated with longer plan periods.
- 5.2 The first stage of the plan making process is the preparation of an Issues and Options paper and this is included as **Appendix A**. This sets out the key issues that the plan needs to address based around nine different themes. Whilst the policies in the Local Plan 2032 will only relate to the area within the borough's boundary, the issues to which these policies relate will in some cases have cross boundary or strategic significance. The document draws together a list of the strategic issues which may be ones to consider in relation to some or all of our neighbours. These include the overall level of housing and employment provision, the impact of additional development on the highways within and beyond the borough boundary and other infrastructure issues. Under the Localism Act the Council has a duty to cooperate with a range of different bodies including neighbouring local authorities.

### **Housing and Jobs growth forecasts.**

- 5.3 In accordance with the National Planning Policy Framework, the Council must make provision for at least its own objectively assessed need for new homes and jobs over the plan period. There are three stages to determining what that need may comprise. Growth targets are no longer directed through the regional planning process and the Council is now able to derive these locally. The first stage is the identification

of the 'starting point' derived from looking at forecasts based on a range of factors including population change, household formation and migration. The second stage is to consider whether 'market signals' require the initial figures to be adjusted. These include information on house prices, rents, affordability and development rates.

- 5.4 The local plan must show how the Council can make provision for the final housing and jobs numbers that come out of step two (in other words the starting point numbers adjusted to take account of local market signals). However, the results from step two are likely to give a range for the amount of growth that is appropriate for Bedford Borough and the Council must decide within that range how much growth (new jobs and houses and associated infrastructure) should be included in the local plan. In other words should the amount of growth be at the lower end of the range, towards the higher end of the range or somewhere in the middle? This is step three.
- 5.5 Sufficient forecasting has been carried out to complete stage one of this process. When the number of new houses completed and already planned to 2021 is taken into account this shows a requirement ranging from 940-3,860 new houses. In terms of new jobs, around 11,000 new jobs are likely to be needed to 2032. Initial work suggests that the land for jobs which has already been identified in existing plans should provide for around 8,000 of those jobs so more land will need to be identified.
- 5.6 Further technical work will be carried out in order to complete stages two and three prior to the drafting of the plan. The housing and jobs figures will therefore be subject to change once the outcome of that work is known. The stage one figures do however provide a basis for engaging with local communities, key stakeholders and infrastructure providers to seek views on the level of housing and jobs growth the borough may need to plan for. The results of the consultation will also help to decide the final level of growth that the plan promotes.
- 5.7 As part of the process of identifying the borough's housing needs, consideration will need to be given to the needs of Gypsies and Travellers and Travelling Showpeople. Revised needs assessments are to be carried out and these will be the subject of a separate consultation during early 2014.

### **The Spatial Strategy**

- 5.8 The current spatial strategy comprises the Growth Area (Bedford, Kempston and the Northern Marston Vale) where the majority of development is to be located and the Rural Policy Area where there is a policy of restraint.
- 5.9 To date this spatial strategy has been successful in channelling development into the Growth Area. By way of example, of the 654 dwellings completed in 2012/13, 613 (93.7%) were located in the Growth Area.
- 5.10 The current strategy identifies Growth Area Key Service Centres (Stewartby, Wootton and Wixams) and Rural Key Service Centres (Bromham, Clapham, Great Barford, Harrold, Sharnbrook and Wilstead) which will be the focus of development outside of the urban area of Bedford and Kempston. In villages which are not key service centres, existing policies allow only very limited development.

- 5.11 One of the purposes of the Issues and Options paper is to consider what the best locations for future new development are. These need not follow the current spatial strategy although continuation of that general approach could be one option. Alternative options could include allocating a higher proportion of development in the rural area either through the expansion of existing villages or through the identification of new rural growth points. The paper highlights five potential options whilst recognising that elements of each can be combined together to create further options.

### **The Town Centre**

- 5.12 The paper recognises that as with centres nationally, the town centre is facing significant pressures for change in retailing whilst there is still pressure to locate new retail floorspace in out of town centre locations. The Issues and Options paper seeks views on how the town centre should adapt to those changing circumstances and what role the town centre should play in the future. A separate Bedford Town Centre Discussion paper has been prepared and this is included as **Appendix B**. In accordance with national guidance it is proposed that this is made available for a focussed consultation with key stakeholders in the town centre in order to assist in devising a strategy for the town centre.

### **Review of existing policies**

- 5.13 As stated above the new Local Plan provides an opportunity to review existing policies especially those development management policies used in the determination of planning applications. The Issues and Options paper seeks views on the subject areas that these policies should cover.

### **What happens next?**

- 5.14 The Mayor is recommended to approve the Issues and Options paper (**Appendix A**) for public consultation which will take place for a six week period in the New Year. Key stakeholders including Parish and Local Councils will be consulted along with the general public. At the same time, a 'call for sites' will be undertaken inviting landowners and their agents to submit potential development sites for consideration by the Council. The Issues and Options paper asks a number of questions and the responses to these will help to guide the direction and content of the Local Plan. Further technical work will be carried out to refine the housing and job targets and to provide a comprehensive evidence base to support the plan.
- 5.15 In order to explore the particular issues facing the town centre in more detail, and consider the approach that the local plan should take, a Discussion Paper has been produced. It is intended that this will be the subject of focussed consultation with town centre organisations. The Mayor is recommended to approve the Bedford Town Centre Discussion paper (**Appendix B**) for consultation with key town centre stakeholders.

5.16 Following consultation, the Council will need to consider any responses received both to the two papers and to the call for sites prior to preparing a draft plan for submission.

## 6. **Summary of Consultations and Outcome**

6.1 The following Council units or Officers and/or other organisations have been consulted in preparing this report:

Executive Director Environment and Sustainable Communities  
Management Group

6.2 No adverse comments have been received.

## 7. **Ward Councillor Views**

7.1 This report relates to corporate and borough-wide interests and is not therefore relevant to an individual ward. No ward Member consultation has taken place.

*Report Contact Officer:* Ronald McKay, Head of Planning Policy and Housing Strategy  
[Ronald.McKay@bedford.gov.uk](mailto:Ronald.McKay@bedford.gov.uk)

*File Reference:*

*Previous Relevant Minutes:* None

*Background Papers:*

*Appendices:*

*Appendix A – Issues and Options Paper*  
*Appendix B – Bedford Town Centre Discussion paper*

(Fw0666da)

## Bedford Borough Council Local Plan 2032 Issues and Options

### 1. Introduction – what is this consultation about?

#### What is the purpose of this consultation? What will happen to my comments?

1.1 The purpose of this consultation is to let you know that we have started to think about how we should plan for Bedford Borough after 2021, the date that current development plans run to. The information in this document explains why we are preparing a new local plan, what it will cover and some of the detail of how we intend to go about the process of writing the plan.

1.2 Importantly it asks you some questions about that process as well as about some of the main issues that Bedford Borough faces in coming years. For example, how much growth we should have and in general terms where it should be located. It also includes options for how those issues might be addressed. Your input is needed at this early stage so that the plan sets off in the right direction; we want to know what you think.

1.3 This consultation also invites you to submit details of possible development sites so that we can see where land is available to develop. This is known as a 'call for sites'. Of course not all the land that is made known to us will be needed but we will be able to make the best selection from those sites put forward. There is more about the 'call for sites' in section 10.

1.4 You will be able to tell us whether you support the sites that have been selected for development at a later stage of the plan's preparation.

#### Consultation dates

1.5 The consultation on the Issues and Options Paper runs from **(add dates)**. Please send your comments as early as you can as this helps us to keep to the timetable.

## How to get involved

- 1.6 A questionnaire is available for you to make comments at Appendix 1 and online at [www.bedford.gov.uk/localplan2032](http://www.bedford.gov.uk/localplan2032)
- 1.7 We would prefer to receive your comments by email. Once you have completed the questionnaire please send it to [planningpolicy@bedford.gov.uk](mailto:planningpolicy@bedford.gov.uk).
- 1.8 Alternatively you can complete a paper questionnaire (which can be requested by calling the Planning Policy Team on 01234 718070). When completed this should be sent to:

Bedford Borough Council  
Consulting Bedford  
Local Plan 2032  
FREEPOST ANG5840  
Bedford MK40 1ZD

- 1.9 This is a freepost address and no stamp is required. All responses (electronic and paper) must be received by 5 pm on **(add date)**.
- 1.10 The Issues and Options Paper may also be viewed in hardcopy at the council's Customer Service Centre at 2 Horne Lane, Bedford. MK40 1RA. It is also available in all libraries in the borough as well as Rushden, Flitwick and St Neots libraries during normal opening hours.
- 1.11 Responses received will be published on the council's web site and attributed to source (this may include your name and a reference number).

## The next steps

- 1.12 This consultation marks the first stage in the preparation of the new local plan.
- 1.13 We are starting to write the local plan and we will use the responses to this Issues and Options consultation to help us. There will be an opportunity to comment on a draft plan later this year so that we can gauge reaction to the draft policies and proposals and judge whether the plan is 'sound'. Provided no further changes are necessary, we will then submit the Local Plan to the Secretary of State for independent examination.
- 1.14 More information on publicity and consultation in the local plan process and guidance on how to make effective comments are contained in the Statement of Community Involvement 2013 ([www.bedford.gov.uk/SCI](http://www.bedford.gov.uk/SCI)).

## How long will it take to write the plan?

1.15 These are the key dates for the preparation of the Local Plan 2032.

- |   |   |                       |
|---|---|-----------------------|
| • Issues and Options Consultation                 | - | January-February 2014 |
| • Draft Plan consultation (Plan for Submission)   | - | Autumn 2014           |
| • Submit the plan to the Secretary of State       | - | Autumn 2015           |
| • Public Examination (including hearing sessions) | - | Spring/summer 2016    |
| • Adoption  | - | Autumn 2016           |

More information can be found in the Local Development Scheme

([http://www.bedford.gov.uk/environment\\_and\\_planning/planning\\_town\\_and\\_country/planning\\_policy\\_its\\_purpose/local\\_development\\_scheme.aspx](http://www.bedford.gov.uk/environment_and_planning/planning_town_and_country/planning_policy_its_purpose/local_development_scheme.aspx))

## Why is the Local Plan 2032 being prepared?

1.16 The main purpose of the plan will be to explain the amount and location of new housing, employment and other development that will be needed in the coming years. It will also contain planning policies that will be used to help make decisions on planning applications.

1.17 The policies and proposals in the local plan will need to address issues that are important in Bedford Borough. They will help the council to achieve its existing wider priorities. For example, by identifying sites for development that create jobs, policies will support the council's Growth Plan ([http://www.bedford.gov.uk/business/economic\\_development/strategies\\_plans\\_and\\_research.aspx](http://www.bedford.gov.uk/business/economic_development/strategies_plans_and_research.aspx)). The Growth Plan seeks to attract new businesses into the area as well as help existing businesses to expand. In turn new employment opportunities will bring jobs for residents and attract people to move into the borough. The money that those people spend will help to support local shops and services, resulting in a stronger and more prosperous local economy.

1.18 Many changes to the planning system have taken place in recent years. In particular the Localism Act 2011 has changed the way that the amount of development for an area is decided and also, through the introduction of neighbourhood planning, it has offered the opportunity for communities to have more of a say in what happens in their local area. Before the Localism Act local councils such as Bedford were given development targets that had been set in regional plans and in turn the regional targets had been fixed by the government of the day. This 'top down' approach has disappeared and for the first time Bedford can set its own local need and growth aspirations. It will do this in the new local plan.

1.19 In addition the current government is committed to simplifying the planning system. One of its priorities has been to cancel the many detailed government guidance documents that had been published over the years. These have now been largely replaced by the government's National Planning Policy Framework (NPPF - [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6077/2116950.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf))

1.20 The NPPF explains broad national planning principles that local plans must comply with. Importantly the NPPF explains that the local plan is the basis for making decisions on planning applications so it is important that the plan is up to date. Whereas at the moment Bedford has several individual documents that together are called 'The Bedford Development Framework', the NPPF favours having one plan for the area, and it explains that when the plan is finalised it should preferably look ahead for the next 15 years.

1.21 In the light of the changes that are described above, in particular the fact that current policies only look ahead to 2021 and are contained in more than one plan, the council must prepare a new plan if it is to be in a strong position to decide for itself where development will take place. When it is finished the plan should explain what type of development will happen in Bedford Borough, where we should expect it to be built, when it will be built and how it will be done. Your help is needed to make those decisions.

## **How does this affect me?**

1.22 The local plan will result in new development happening. This could be in Bedford and Kempston, on the outskirts of the urban area, in our villages or in other locations. The changes that take place may affect you in a variety of ways; you may be able to see new housing or employment development near to where you live or on your way to work; new facilities may be provided close to you such as new shops, schools or open spaces; new roads or cycle ways could be built to make journeys shorter or easier and new employers may provide new job opportunities. Planning affects many aspects of our lives and it is important that we get the balance right.

1.23 If you want to have a say in how much and what type of development takes place and where it goes then this is the time to get involved.

## **Why is 2032 the proposed end date of the plan?**

1.24 The government has set down a fair and transparent way of putting together a local plan. Local authorities must stick to the 'rules' otherwise plans can be found 'unsound' during their Public Examination or be challenged in the High Court. The process of preparing a plan provides opportunities for a wide range of people and organisations to have their say on the scope of the document, draft policies and proposals before the plan is finalised. The results of consultation exercises are important and really do help to shape the final document. Progress must be regularly reported to Bedford Borough Council's Executive which considers public reaction to draft policies and proposals and agrees changes that should be made before moving on to the next stage. More detail about consultation during the preparation of a local plan can be found in the council's published Statement of Community Involvement 2013 ([www.bedford.gov.uk/SCI](http://www.bedford.gov.uk/SCI)).

1.25 As a result, plans take a while to prepare. The broad timetable for this local plan is explained in paragraph 1.15 and in the Local Development Scheme. It is hoped that the plan can be finalised by the end of 2016 though this is a very challenging timetable. Progress will be regularly reviewed and the timetable updated if necessary. As explained above, the plan should preferably have 15 years of life from the date it is finished, which explains why the proposed end date is the financial year 2031/32.

1.26 Plans that try to look ahead further than 15 years are difficult to prepare with any level of confidence because it is hard to predict and make accurate judgements about what changes will take place and what development will be needed so far in the future. Although this plan will cover the period up to 2032, it will be reviewed before that date to move the horizon forward.

***Question 1. Do you agree or disagree with the suggested 2032 end date for the plan?  
If you prefer an alternative end date please explain why.***

## **What will happen if we don't find more development sites?**

1.27 Our population continues to change and grow and the government has given the responsibility for deciding local needs to local authorities. This means that we must use Census and other local information to decide what level of growth is right for Bedford Borough and where that growth should go. This will be growth in the number of houses, jobs and infrastructure such as school places, roads, open space and shops that together make sure our communities are good, sustainable places to live.

1.28 Preparing a robust plan that shows enough development sites to cater for the amount of growth that the area needs would give the council and local people the opportunity to bring their aspirations for a growing, vibrant prosperous community into reality. With a plan in place, if planning applications were made on 'unplanned' sites the council would be in a stronger position to refuse them and be able to make a good case for why appeal inspectors should not allow them. We would be able to show that other, better sites had been properly planned for.

1.29 If we don't produce a local plan explaining what our local needs are along with development sites to show how those needs will be met, we will have less of a say in what development is allowed to go ahead in the future. With no up to date policies or plan in place to explain where development to cater for local needs is planned, the council would find it difficult to resist building that might be proposed in unwelcome locations. Furthermore businesses might look to invest in communities and economies elsewhere because they offer a more certain context for business decisions and growth.

## **Some planning policies are relatively new; will all existing planning policies be reviewed as part of the Local Plan 2032?**

1.30 Over recent years the council has been busy preparing the Bedford Development Framework. This framework is a group of documents that together contain planning policies for the borough. The idea of having more than one document was introduced by the government in 2004; the intention was that each document would be quite brief, quick to prepare and easier to understand than some of the old style local plans (pre 2004) that often ran into hundreds of pages. Consequently documents prepared as part of the Bedford Development Framework have gradually replaced many but not all policies in the Local Plan 2002.

1.31 In Bedford Borough we have prepared and adopted two new-style policy plans as part of the Bedford Development Framework:

- The Core Strategy and Rural Issues Plan (2008). This contains broad, strategic policies.
- The Bedford Town Centre Area Action Plan (2008). This looks in detail at town centre regeneration.

1.32 The recent Localism Act and the NPPF have changed this approach. The preference is once again for all policies to be together within one document that will be known as a local plan.

1.33 We prepared most of the recent Allocations and Designations Plan under the 2004 system but as it was adopted in 2013 after the publication of the Localism Act (2011) and the NPPF (2012), it is known as the Allocations and Designations Local Plan. However, it is not the type of comprehensive plan that the NPPF describes; it is intended to be read alongside the Core Strategy and Rural Issues Plan and the Bedford Town Centre Area Action Plan. Indeed, it must also be read alongside some policies that still remain 'saved' from the Bedford Borough Local Plan adopted in 2002.

1.34 In addition account must also be taken of 'saved' minerals and waste policies from the Bedfordshire Minerals and Waste Local Plan adopted in 2005. Other minerals and waste policies are within the recently adopted Minerals and Waste Local Plan: Strategic Sites and Policies (2014).

1.35 As a result the current situation is quite complicated and the preparation of the Local Plan 2032 offers the opportunity to once again bring all policies, apart from Minerals and Waste policies, together.

1.36 However, this does not mean that all our policies need to be updated right now.

1.37 The policies from the Allocations and Designations Local Plan have only recently been adopted (July 2013) and are unlikely to need amending so soon. We think they can be carried forward without change. The same approach could be taken for any policies in the Core Strategy and Rural Issues Plan and the Bedford Town Centre Area Action Plan that do not need to be changed. Policies that fall into this category include Settlement Policy Areas, Village Open Spaces and Urban Open Spaces. However we would welcome your views on this approach. The idea is that we would bring all the remaining parts of earlier plans together with the Local Plan 2032 in one folder to make our policies easier to use. We would need to explain clearly when each of the policies within the folder had been adopted.

***Question 2. Do you agree with this general approach, in other words that the council should not seek to review or replace recently adopted policies and those from earlier plans that are still relevant?***

## What information will be available to inform the plan?

1.38 It is important that we have up to date information available on which to base new policies and proposals. As a result, a number of new and updated technical studies are being prepared. Some have already been undertaken because they are needed in order to decide which options to include in this consultation paper. Others are still being produced and will inform the drafting of the plan in due course. The following list explains the range of evidence that we have or intend to prepare.

- Assessment of infrastructure needs including highway infrastructure and assessment of cumulative impact
- Assessment of leisure facilities (sport and non-sport)
- Assessment of settlement hierarchy in the borough.
- Economy and Employment Land Study
- Factual updates of existing designations e.g. proposed cycle routes that have been delivered (notational changes will be needed)
- Gypsy and Traveller Accommodation Assessment update
- Hotel and visitor accommodation needs update
- Landscape Character Assessment update
- Objective assessment of local housing and jobs need
- Review of saved Local Plan 2002 policies, Core Strategy and Rural Issues Plan Policies and Bedford Town Centre Area Action Plan Policies to identify those that will be replaced by policies in the local plan.
- Strategic Flood Risk Assessment update
- Strategic Housing Land Availability Assessment
- Strategic Housing Market Assessment
- Town centre study (retail and other uses)
- Travelling Showpeople Accommodation Assessment
- Viability appraisal of sites and of the plan

1.39 Completed studies will be available on the council's web site.

***Question 3. Do you agree with the scope of the evidence base?  
If not, what do you think should be added or deleted?***

## 2. Sustainability Appraisal / Strategic Environmental Assessment

### What is Sustainability Appraisal and why is it important for the plan?

2.1 A sustainability appraisal (SA) is a statutory requirement that integrates the requirements of the Strategic Environmental Assessment (SEA) Directive with plan making. It makes sure that the environmental, social and economic effects of a plan and reasonable alternatives to the plan are being considered.

2.2 As a first step, a Sustainability Appraisal Scoping Report [\(add link\)](#) was prepared in consultation with English Heritage, Natural England and the Environment Agency to establish the range of issues to be covered in the sustainability appraisal, develop the sustainability appraisal framework and identify the key sustainability issues that are relevant to the new local plan.

2.3 Following the scoping stage, the next stage involved the appraisal of the plan options set out in this Issues and Options Paper against the sustainability objectives. This has highlighted the social, economic and environmental impacts that are likely to arise from each plan option. The findings will help to develop the most sustainable strategy for future development in the borough and recognise where measures are necessary to mitigate any negative effects that cannot be avoided. The Issues and Options Paper Sustainability Appraisal Report is subject to consultation alongside the Issues and Options Paper and can be found at [\[add link\]](#).

2.4 A sustainability appraisal of sites to consider the site-specific sustainability issues of the sites submitted through the call for sites will be carried out separately as part of the site selection process. This will help to determine the sites to be allocated for development in the new local plan.

## 3. Habitats Regulations Assessment

3.1 The Habitats Directive (an EU policy) establishes an ecological network of European Sites (Natura 2000 Network) and requires consideration of whether or not an Appropriate Assessment needs to be undertaken during the preparation of a local plan. The purpose is to assess what effects, if any, the plan might have on European sites, such as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), in view of the conservation objectives for these sites. Wetlands of international importance designated under the Ramsar Convention (Ramsar sites) are afforded the same level of protection and will therefore also be considered as part of the Habitats Regulations/Appropriate Assessment.

3.2 There are no European sites or Ramsar sites in Bedford Borough, but it will be necessary to carry out a screening exercise to assess whether the new local plan, in combination with other plans and programmes, is likely to have an adverse effect on other such sites beyond the plan area. The screening will be undertaken as part of the sustainability appraisal of the Plan for Submission and consultation will be carried out with Natural England.

## 4. Bedford Borough today and challenges for the future

4.1 Bedford Borough covers an area of 476 sq. km and is home to approximately 160,000 people that form around 65,000 households. Almost two thirds of the population live in the urban area of Bedford and Kempston and 35% in the surrounding rural area that is made up of 45 rural parishes. Total population numbers are forecast to grow to more than 170,000 by 2021. Within the sub-region Bedford's economic market is most affected by competition from Milton Keynes, Northamptonshire and Cambridgeshire. Located in what was formerly identified at regional level as a growth area, Bedford Borough has many strengths and opportunities, but is also a borough of contrast, diversity and challenge. Further key statistics about the Borough can be found at [http://www.bedford.gov.uk/council\\_and\\_democracy/statistics\\_and\\_census.aspx](http://www.bedford.gov.uk/council_and_democracy/statistics_and_census.aspx)

4.2 This section looks at the state of the Borough today and explores the key themes and issues that the new Local Plan 2032 will need to address. Draft objectives for the plan based on these themes can be found at Appendix 2.

### **Local Plan Theme 1: Housing**

In the last 10 years Bedford Borough has experienced significant demographic change. In particular the population is ageing. The number of people over 80 has increased by 29% creating a need for suitably specialised accommodation for the elderly.

Contrary to previous forecasts, the decline in household size has halted over the past decade; average household size has remained largely unchanged at 2.4 persons per household. The number of larger households has in fact increased as a result of housing affordability issues, the formation of large in-migrant households and demographic change. National housing policies such as the withdrawal of the spare room subsidy and other changes in housing benefit entitlements will have an impact on the type of homes required to 2032.

There continue to be significant pressures on affordability both for house purchase and renting. The gap between income and rents/house prices is increasing, making it more difficult for people to afford accommodation or access mortgages. Out of 65,000 households located in Bedford Borough, over 11,000 households rely on housing benefit and almost 13,000 households rely on council tax reduction to assist with their housing costs. Trends in housing tenure have also changed in the last 10 years; private renting has increased significantly with a corresponding fall in owner occupation.

### **Issue 1**

**How much new housing do we need to provide sites for, what type of housing should it be (size and tenure) and where should it be located in order to cater for the needs and aspirations of the borough's population over the lifetime of the plan.**

## **Local Plan Theme 2: The economy**

The council has secured significant new investment in economic development over the past years, such as the recently completed Castle Quay shops and flats, Premier Inn hotel, Brewers Fayre restaurant, the new Waitrose and Morrison's supermarkets and the B&Q store. Other major schemes are in the pipeline including the Riverside North development and Bedford bus station regeneration.

Recent policies have sought to retain sustainably located and viable employment sites in the urban area. We must consider whether changes in the market justify taking a different approach to the range of employment opportunities that should be encouraged on employment sites and whether any existing employment sites should be made available for other uses.

There has been a significant shift in consumer behaviour with an increasing tendency for people to shop on a 24 hour basis using technology such as computers, smart phones and tablets. This in combination with reduced consumer confidence and structural change in the retail industry has created a challenge for Bedford town centre. Although vacancies in the primary shopping area of Bedford town centre have increased in recent years, demand for new shops in Bedford is evident, particularly located out of the town centre where there is more space for large shops with adjacent free car parking. A larger population is likely to result in a demand for further shopping facilities and we need to consider where these should be located, balancing sustainability and viability considerations. The future role of the town centre will be an important consideration for the new local plan.

There are currently around 70,800 jobs in Bedford Borough. Although up to 2010 jobs growth was broadly in line with housing growth, in more recent years the economic recession has slowed the rate of job creation. 30.5% of residents have jobs in education, health and local government, and 17.1% work in wholesale and retail. 41.3% of residents fall into the managerial/professional and intermediate socio-economic groups. 18% of the working age population (aged 16-64) are unemployed and seeking work or are economically inactive and not looking for work, this compares to 23% nationally and 20% in the East of England. Matching the skills of those who are seeking employment with existing and new employment opportunities continues to be a challenge.

### **Issue 2a**

**How to support a stronger local economy delivering higher levels of growth and employment for the benefit of the borough's existing and future residents, and address the current imbalance between housing and employment growth to deliver a more sustainable pattern of development.**

### **Issue 2b**

**Recognising that the role of the town centre is changing, how to create an attractive, safe, successful town centre, and provide a distinctive range of activities and facilities which can be enjoyed by all.**

### **Local Plan Theme 3: Health and well-being**

In general the state of public health in Bedford Borough is similar to the rest of England. Whilst overall life expectancy is rising both at birth and at the age of 65, there are inequalities within the Borough and an increasing burden of poor health towards the end of life. Some of the most deprived areas nationally are located in Bedford Borough, including in Castle, Harpur, Cauldwell, Kingsbrook, Kempston North and Goldington wards. Life expectancy in these areas is significantly lower than in the rest of the borough, with a difference of 9.1 years life expectancy (for women at birth) between the most and least deprived wards. In addition to poor health, these areas also experience the highest level of income deprivation, education and skills deprivation and unemployment. Almost 16% of pensioners in the borough are income deprived and 20% of children in the borough are raised in income deprived households. Although generally more affluent, two-thirds of the borough's rural residents live in areas which are among the 20% most deprived nationally in their access to essential services such as a GP, primary school, post office or supermarket. In addition, the significant rise in the number of births, which is largely attributable to mothers born outside the UK, is likely to result in a rise in preschool and younger school age populations and may place pressure on existing education facilities.

Up to 100 different black and minority ethnic groups make up 28.5 % of the total population and are largely concentrated in the urban area of Bedford and Kempston. There are particularly large black and minority ethnic communities in those wards that are amongst the most deprived nationally and locally.

#### **Issue 3**

**How to achieve a strong, vibrant and healthy community where everybody has access to high quality health, social care and everyday essential services when they need them and the help and infrastructure they need to lead healthy and independent lives.**

### **Local Plan Theme 4: Infrastructure**

The council is pro-actively working to deliver new infrastructure alongside growth in housing and jobs. We continue to liaise with infrastructure providers and others to understand the need for additional infrastructure, such as water infrastructure and broadband. By spring 2014 the Community Infrastructure Levy is likely to be in place, which will allow for levy funds to be directed towards the provision of general infrastructure across the borough.

#### **Issue 4**

**Through the implementation of the Community Infrastructure Levy and other means, how to help meet existing and future infrastructure needs in both the urban and rural areas of the borough.**

### **Local Plan Theme 5: Transport**

Around 60% of the borough's residents in employment travel to work by car. We recognise the importance of more sustainable alternatives and are working with local bus operators to ensure that rural bus services are maintained. We are doing this by providing financial assistance to support the viability of some rural routes and latest figures show that in certain areas passenger numbers are now rising. However there is still the potential for improvements to public transport accessibility between rural areas and Bedford particularly during peak times. Whilst public transport accessibility remains a key challenge for some rural residents traffic congestion, particularly in the town centre, and resulting poor air quality issues are the key challenges to be addressed in the urban area. The proportion of those cycling and walking to work has remained largely unchanged over the past decade at 3.8% and 9.7% respectively.

Key transport projects for the borough include the Bedford Western Bypass phase 2, Batts Ford bridge, the electrification of the Midland Mainline and East West Rail. These are major projects for the future of our borough and the council will continue to work with its partners to bring them forward at the earliest opportunity.

#### **Issue 5**

**How to improve the borough's transport infrastructure in order to support growth in the local economy and to make the borough more attractive as a place to live and do business. In particular how to reduce congestion in and around the town centre and make journeys by public transport, walking and cycling more attractive to encourage an increase in more sustainable modes of transport.**

### **Local Plan Theme 6: Natural environment**

Bedford is home to a range of significant habitats and protected species in addition to a valuable network of green infrastructure. We are supporting the implementation of key projects, such as the Bedford to Milton Keynes Waterway Park to link the Grand Union Canal with the River Great Ouse through a series of waterway parks, the continued creation of the Forest of Marston Vale and the Bedford River Valley Park.

#### **Issue 6**

**How to develop a strong and multifunctional urban and rural green infrastructure network through protecting, enhancing, extending and linking landscapes, biodiversity sites, heritage sites, green spaces and paths.**

### **Local Plan Theme 7: Built environment**

Historically centred on a medieval market town, Bedford today is home to a rich historic environment, including across the borough 1,328 listed buildings, 69 Scheduled Ancient Monuments, 5 registered parks and gardens and over 4,000 non-designated archaeological sites. We continue to work to improve the quality of the built environment within the Borough through flagship projects, such as the Castle Quay development and Townscape Heritage Initiative.

#### **Issue 7**

**How to best support a high quality, inclusive and safe built environment which values local heritage and is enjoyed by all.**

### **Local Plan Theme 8: Climate change**

The council is committed to working towards the delivery of the UK Climate Change Programme and reducing emissions in line with the Kyoto Protocol. We adopted a Carbon Management Plan in March 2011 and continue to work towards meeting our aspirational target of 40% carbon reduction by implementing projects to reduce energy consumption from buildings, business transport, fleet, street lighting and schools. Projects include the Archimedes Screw located on the River Great Ouse which generates electricity, and solar panels on the roof of Allhallows multi-storey car park. The council is now also a Lead Local Flood Authority and works with partners to reduce the risk and impact of flooding from all sources.

#### **Issue 8a**

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

#### **Issue 8b**

**How to meet local targets for carbon reduction.**

### **Local Plan Theme 9: Viability and deliverability**

In rural areas housing completions have already reached the Core Strategy and Rural Issues Plan 2021 target and whilst housing completion rates have been below the target in Bedford, Kempston and the villages in the Marston Vale, the council has taken a proactive approach to housing delivery and major housing sites have achieved a steady rate of construction. Following the start of the economic downturn we have performed positively in comparison to our neighbours. Around 7,500 dwellings currently have planning permission and on top of this approximately 4000 dwellings are already planned for so we are well placed to take advantage of an upturn in market confidence. The majority of previously allocated employment sites have been implemented. There is significant interest in newly allocated employment sites and we anticipate that they will be delivered successfully. Progress is also being made in bringing forward town centre regeneration schemes at Bedford bus station and Riverside North.

#### **Issue 9a**

**How to ensure that the development strategy is viable and deliverable over the plan period to maintain a supply of development sites that are attractive to the market.**

#### **Issue 9b**

**How to provide more certainty for developers regarding the costs associated with developing sites.**

*Question 4. Do you agree that 1-9 above are the key themes that the Local Plan 2032 should address?  
If not, what do you think should be added to /deleted from the list of themes?  
Do you have specific comments on the themes or the objectives in Appendix 2?*

*Question 5. Do you have any comments on the issues that are identified for each theme? Should any issues be added /deleted?*

## **5. Looking beyond the Bedford Borough boundary**

5.1 Whilst the policies in the Bedford Borough Local Plan 2032 will only relate to the area within the Borough's boundary, the issues to which these policies relate will in some cases have cross boundary or strategic significance.

5.2 We need to identify these strategic issues and demonstrate that we have worked with neighbouring and other councils and strategic bodies to ensure that the planning of our area is properly coordinated with that of other authorities.

5.3 We have a duty to do this created in the recent Localism Act called “The Duty to Cooperate”. This follows the revocation of Regional Spatial Strategies which previously provided the means of undertaking strategic planning.

5.4 Bedford's main linkages by road connect the town to Milton Keynes to the west, Cambridge to the east, Northampton to the north west and Luton to the south. The Midland Mainline railway runs north-south through the Borough providing connections to London and the Midlands, First Capital Connect services link Bedford to London stations, Gatwick Airport and Brighton whilst the Marston Vale line provides local rail services to Bletchley. The Borough is thus part of a complex network of living, working and leisure activity.

5.5 The local authority areas which have a border with Bedford Borough Council are Huntingdonshire District Council, Cambridgeshire County Council, Central Bedfordshire Council, Milton Keynes Council, East Northamptonshire District Council, Wellingborough District Council and Northamptonshire County Council. Some of these authorities are members of the South East Midlands Local Economic Partnership (SEMLEP). SEMLEP provides a forum for coordinated working on cross boundary matters. The council will meet separately with authorities who are not members of SEMLEP to discuss strategic issues. This may include authorities that do not immediately adjoin the council's area.

5.6 We have started to draw together a list of the strategic issues which may be ones to consider in relation to some or all of our immediate and near neighbours.

### **1 Overall scale of new housing provision**

Planning for new housing needs to take account of local market areas. Previous research has shown the Bedford housing market area to be fairly well aligned with the Borough boundary but there are overlaps with the market areas for Central Bedfordshire, Northampton and Huntingdonshire. The Milton Keynes market area is also a significant area adjacent to the Borough.

### **2 Overall scale of new employment provision**

Like the housing market areas, economic areas also cross local authority boundaries. Milton Keynes and Cambridge are significant employment areas and planning for new jobs needs to take account of these interrelated markets.

### **3 New development adjacent to the boundaries with other authorities**

We would need to discuss with neighbouring authorities any proposed development sites that were located close to their boundaries.

### **4 Impact on the Highway network**

We need to work with our neighbouring authorities (and vice versa) to assess and plan for the impacts of new development on major roads such as the A421, M1 and A1 junctions in Central Bedfordshire, Huntingdonshire and Milton Keynes.

## **5 East - West Rail**

We are already working with partners to deliver the Oxford to Bedford section of the East-West Rail link. Work is also starting to determine a route for the Bedford to Cambridge section.

## **6 Midland Mainline Rail Electrification**

This is a strategic project with Network Rail which also involves joint working with Central Bedfordshire, Luton and Northamptonshire.

## **7 Travellers**

The approach to assessing future needs for Gypsies and Travellers and Travelling Showpeople.

## **8 Green infrastructure**

Green infrastructure provision is often a cross boundary issue. Projects including the Forest of Marston Vale and Milton Keynes to Bedford Waterway are ones where joint working is already taking place.

## **9 Town Centres**

Bedford is part of a network of retail centres. Neighbouring authorities need to work together to take account of impacts as these centres grow and change.

## **10 Infrastructure**

Proposals for an increase in housing or jobs can have implications for the supply of utilities including gas, electricity and water and drainage requirements, together with the capacity of education and health infrastructure. The implications of these may extend beyond the Borough's boundary.

*Question 6. Do you agree with the range of cross boundary and strategic issues?*

*Question 7. Are you aware of any others that you think should be added to the list?*

## 6. What level of growth is needed?

6.1 Following recent changes to the planning system which brought an end to regional plans, local councils are now responsible for setting their own local targets for new homes and jobs and identifying the future quantity of housing and employment land needed.

6.2 Our aim is to ensure that the right amount of new housing and employment land is provided in the best locations to meet local requirements and to help bring new jobs into the area.

6.3 We are undertaking an “objective assessment” of the housing and jobs required in the Borough for the period up to 2032 in accordance with the latest government guidance issued in August 2013.

6.4 Whilst the assessment is being undertaken for Bedford Borough Council it will also take into account the parts of the housing market area and wider economic area that lie beyond the borough boundary.

6.5 There are three steps to working out local targets for homes and jobs and these are outlined below. At this stage we have only completed step one; steps two and three are still in progress. Because of this the options that we are asking you to comment on at the end of this section represent possible growth scenarios. They are unlikely to be the final numbers that are included in the local plan when it is drafted but your comments on these options along with the numbers derived from the technical work when it is finished will help us to decide which number we think is the best for Bedford borough and should be included in the draft plan.

6.6 Government guidance explains that at this stage we should look at whether housing and employment growth in current plans have been delivered. In other words we need to see whether there is a backlog of development that needs to be taken account of in the Local Plan 2032. This is considered in the technical paper (see paragraph 6.10).

### Step one: Establishing the baseline “starting point” housing and jobs requirement

6.7 Government guidance explains that the starting point for the assessment of housing requirements should be the household projections published by the Department for Communities and Local Government applied to the population projections produced by the Office for National Statistics. These sources provide the basis for understanding the way that the Borough’s population will grow and change during the plan period.

6.8 Because the forecasts that are produced by this work are based on past trends we also need to look at the local factors which may affect future household formation rates. These include the likely level of future in and out-migration (the number of people moving into and out of Bedford Borough) and economic constraints on household formation (for example fewer new households forming due to the difficulty in getting mortgages). At the same time we have also looked at the likely number of jobs that will be needed, again using trend based information (what happened in the past) and the economic forecasts contained in a model called the East of England Forecasting Model.

6.9 This way of working out possible housing and job numbers doesn't give one answer. It gives a range of possible answers or forecasts.

6.10 The document 'Bedford Borough Demographic Forecasts 2012-2032' [\(add link\)](#) has been prepared for Bedford Borough Council by consultants Edge Analytics. It explains the range of possible forecasts and the difference between them. The consultants recommend that Bedford Borough Council considers its 'starting point' for the objective assessment of housing need within the range of 650-815 dwellings per year over the plan period (2012-2032). For the purpose of this consultation the mid point of this range has been chosen to illustrate possible options for growth at Step three. Once all technical work has been completed (explained further below) the most appropriate level of growth may be higher or lower than this mid point number.

6.11 The following table shows the mid point of the range, how many homes we have already planned for up to 2021 (in existing plans) and therefore how many new homes we would need to find space for in the Local Plan 2032.

**Table 1: 'Starting point' mid point**

Forecast	Average annual completions 2012-2032 (houses)	Number of houses required (2012-2032)	Number of new houses already planned (to 2021 inc 12/13 completions)	Number of new houses to be allocated in the Local Plan 2012-2032
Mid point	730	14,600 (20x730)	12,200	<b>2,400</b> (14,600-12,200)

6.12 We already need to provide around 3,000 jobs to help bring unemployment down to pre-recession rates. The growth in the Borough's population to 2032 will lead to an increase in the number of people living in the Borough who are of working age and will also need jobs; around 8,000. So in total around 11,000 new jobs are likely to be needed to 2032. Our initial thoughts are that the land for jobs that we have already identified in existing plans should provide for around 8,000 of those jobs so more land will need to be identified. The work that is to be undertaken will assist in clarifying the number of jobs that we need to provide for, how many jobs the land already allocated will provide for and consequently how much new employment land is needed. This work will include looking at market signals (see below).

## Step two: Taking account of market signals

6.13 Next, government guidance explains that the starting point (step one) should be adjusted to reflect local market signals. Government considers that where demand is high and local people are finding they cannot afford to buy a house, local planning authorities should increase their planned supply of housing to help bring house prices down. The idea is that this will improve housing affordability over the plan period, in other words more people will be able to afford to buy their own home.

6.14 So, in order to assess whether we should make such an adjustment we are undertaking local studies of market signals such as house prices, rents, affordability and development rates. We will also look at the impact of market signals on the economy and the number of jobs we need to plan for.

6.15 In step two we will consider the balance between the number of jobs and homes to be provided.

6.16 The local studies are not yet complete so at this stage we would like to take the opportunity to ask you some early questions about market signals and how we take them into account in reaching the final growth numbers (see question 10 below).

## Step three: Options for growth

6.17 The local plan must show how we can make provision for the final housing and jobs numbers that come out of step two (in other words the starting point numbers adjusted to take account of local market signals). However, the results from step two are likely to give a range for the amount of growth that is appropriate for Bedford Borough and we must decide within that range how much growth (new jobs and houses and associated infrastructure) should be included in the local plan. In other words should the amount of growth be at the lower end of the range, towards the higher end of the range or somewhere in the middle? This is step three.

6.18 For the purpose of this consultation five options are given in the table below which simply shows what would happen to the number of houses that would need to be allocated in the local plan if the level of growth varied by as much as 10% above and below the starting point number (mid point) given at step one.

**Table 2. Housing growth: options for comment**

		Average annual completions 2012-2032	Total over 20 years (2012-2032)	Number of new houses already planned (to 2021 including 12/13 completions)	Number of new houses to be allocated in the Local Plan 2012-2032
Option A	-10%	657	13,140	12,200	940
Option B	-5%	694	13,880	12,200	1680
Option C	730 (mid point)	730	14,600	12,200	2400
Option D	+5%	767	15,340	12,200	3140
Option E	+10%	803	16,060	12,200	3860

The following information may help you to put these numbers in context

- Sharnbrook has around 940 dwellings.
- Oakley has around 970 dwellings.
- Clapham has around 1930 dwellings.
- In the urban area the Britannia development on Kempston Rd opposite South Wing Hospital currently has around 370 flats.
- The urban extension north of Brickhill (Woodlands Park) has around 500 dwellings.
- Development west of Bedford (Great Denham and west of Kempston) when complete will be around 2750 dwellings.
- To the south of the borough, Wixams new settlement will grow to around 6000 dwellings (including planned expansion areas to the north and south).

**Step One**

**Question 8. Do you agree that the 'starting point' range for housing growth (650-815 dwellings completed per year) is appropriate as a basis for deciding the level of growth we should have in Bedford Borough to 2032? If you don't agree please explain why.**

**Question 9. Do you have any comments on the estimate of the number of jobs likely to be needed 2012-2032 (paragraph 6.12)?**

### **Step Two**

**Question 10. Do you have any comments on how the council should take account of market signals? What factors are important and why?**

### **Step Three**

**Question 11. The housing growth options illustrated in Table 2 are based on the mid point of the range recommended in the demographic forecasting report (730 dwellings completed per year). Which of the options A-E most closely fits with the scale of growth you would like to see in the plan?**

**If you prefer a completely different option to those in the table then please explain how much growth you think should be included in the local plan and why.**

## **7. Planning for travellers**

7.1 As part of the preparation of the local plan we must consider the needs of Gypsies and Travellers and Travelling Showpeople. To do this we will carry out two specific pieces of work; a Gypsy and Traveller Accommodation Assessment and a Travelling Showpeople Accommodation Assessment. The studies are very detailed and are not part of this consultation, however this consultation affords the opportunity to tell the council about any land that you may own that could be made available for Gypsy and Traveller and/or Travelling Showpeople needs to 2032. You can find out more about the call for sites in Section 10. There will be an opportunity to comment on any new policy proposals included in the draft local plan at a later date.

## **8. Where should the growth take place?**

### **Current growth strategy**

8.1 Bedford borough's population is largely concentrated in the urban area of Bedford and neighbouring Kempston. Almost two-thirds of the population lives in the urban area, yet this accounts for less than 10% of the land area of the borough as a whole. The remaining population lives in the rural area, generally in a few large villages and many more smaller settlements. Most of the borough's employment and services are located in or near to the urban area.

8.2 Current planning policy for the borough is to direct most new development to the urban area together with settlements in the northern Marston Vale to the south-west of Bedford and Kempston. Development in the remainder of the borough is restricted to what is required to meet local needs and should be located in the larger villages as a preference, while the open countryside is protected from development.

8.3 One of the purposes of this issues and options paper is to consider what would be the best locations for future new development. This need not follow the current strategy although continuation of that general approach could be one option.

### **What are the options for accommodating growth in the future?**

8.4 The amount of new development that needs to be planned for in the period up to 2032 is considered earlier in this document. The new local plan will include policies that guide where this growth should be located. There are five alternative approaches that we would like you to consider, however a combination of them or some other option may also be appropriate. In considering the alternatives, you may find it helpful to refer to the sustainability appraisal (contained in a separate document [add link](#)), which considers the impact of each option on environmental, economic and social conditions. To some extent the final choice of option will also depend on suitable sites being made available for development by landowners (see Section 10).

## Option 1 – Continue the current approach



8.5 Under this option the current strategy of concentrating development in a 'growth area' (Bedford, Kempston and the villages in the Marston Vale) would continue. There would be little development in the remainder of the borough, which would be mostly limited to infilling in existing villages. Development in the open countryside would be restricted in line with government policy.

### 8.6 What could this option mean for the borough?

- Bedford / Kempston and settlements to the south-west in the Marston Vale
  - This area would be the focus for new growth.
  - The economic strength of this area would be maintained and enhanced.
  - New homes, jobs and services would be created in this area.
  - Undeveloped land within this area would come under pressure for development.
  - There may be an increase in traffic congestion in certain locations.
- Rest of the borough
  - There would be little new growth in the rest of the borough.
  - There would be little change from the current pattern of development.
  - The extent of open countryside would be preserved.
  - The lack of growth may mean that rural services could decline.

## Option 2 – Expanded 'growth area'



8.7 This option is similar to Option 1 except that the current 'growth area' (Bedford, Kempston and the villages in the Marston Vale) would be allowed to expand. Development would still be concentrated in the expanded 'growth area' and there would be little development in the remainder of the borough, which would be mostly limited to infilling in existing villages. Development in the open countryside would be restricted in line with government policy.

### 8.8 What could this option mean for the borough?

- Bedford / Kempston and settlements to the south-west in the Marston Vale, together with expansion areas
  - The expanded 'growth area' would be the focus for new growth.
  - The economic strength of this area would be maintained and enhanced.
  - New homes, jobs and services would be created in this area.
  - Open land adjoining the current 'growth area' would come under pressure for development as built-up areas are allowed to expand into the countryside.
  - Undeveloped land within the area could come under pressure for development.
  - There may be an increase in traffic congestion in certain locations.
- Rest of the borough
  - There would be little new growth in the rest of the borough.
  - There would be little change from the current pattern of development.
  - The extent of open countryside would be preserved.
  - The lack of growth may mean that rural services could decline.

### Option 3 – Expanded ‘growth area’ plus some rural growth



8.9 This option is similar to Option 2, with development concentrated in an expanded ‘growth area’, however there would be a greater amount of development directed to the rest of the borough. More growth would be allowed in larger villages than in small settlements. Development in the open countryside, away from the edges of villages and other settlements, would be restricted in line with government policy.

#### 8.10 What could this option mean for the borough?

- Bedford / Kempston and settlements to the south-west in the Marston Vale, together with expansion areas
  - The expanded ‘growth’ area would be the focus for new growth.
  - The economic strength of this area would be maintained and enhanced.
  - New homes, jobs and services would be created in this area.
  - Open land adjoining the current ‘growth area’ would come under pressure for development as built-up areas are allowed to expand into the countryside.
  - Undeveloped land in the area could come under pressure for development.
  - There may be an increase in traffic congestion in certain locations.
- Rest of the borough
  - There would be some new growth in the rest of the borough.
  - New homes and facilities would be created, particularly in and on the edges of the larger villages (subject to sites being available).
  - There would be some loss of open countryside around settlements as a result of development pressures.
  - Rural services, particularly in the larger villages, would benefit from the increased local population.

#### Option 4 – Existing ‘growth area’ plus new rural growth points



8.11 This option is similar to Option 1, although with less development concentrated in the existing ‘growth area’ as there would be some development focussed on a limited number of new rural growth points. There would be little development in the remainder of the borough, which would be mostly limited to infilling in existing villages. Development in the open countryside would be restricted in line with government policy.

8.12 What could this option mean for the borough?

- Bedford / Kempston and settlements to the south-west in the Marston Vale.
  - This area would be the focus for most new growth
  - The economic strength of this area would be maintained and enhanced.
  - New homes, jobs and services would be created in this area.
  - Undeveloped land within this area would come under pressure for development.
  - There may be an increase in traffic congestion in certain locations.
- New growth points in the rural area –
  - New growth in a limited number of locations (subject to appropriate sites being available) would contribute to meeting strategic needs.
  - New homes, jobs and other facilities would be created at these growth points.
  - There would be loss of open countryside as a result of developing the new growth points.
  - Growth points should be well located in relation to the highway network. New infrastructure e.g. new roads/junctions and other community infrastructure may be provided in association with new homes and jobs.
- Rest of the borough
  - There would be little new growth in the rest of the borough.
  - There would be little change from the current pattern of development.
  - The extent of open countryside would be preserved.
  - The lack of growth may mean that rural services could decline.

## Option 5 – Spread development around existing settlements



8.13 This option would abandon the current concentration of development in a 'growth area' and instead allocate development to existing settlements according to their size. Almost two-thirds of the population currently lives in the urban area, so this would mean that the Bedford / Kempston urban area would receive most new development. The remaining one third of new growth would be allocated to rural villages and settlements. Development in the open countryside, away from the edges of villages and other settlements, would be restricted in line with government policy.

8.14 What could this option mean for the borough?

- Bedford / Kempston
  - Approximately two-thirds of new growth would be focussed in and around the current urban area (in line with the current distribution of development).
  - The economic strength of Bedford / Kempston would be maintained.
  - New homes, jobs and services would be created in this area.
  - There would be some loss of open countryside adjoining the urban area as a result of development pressures.
  - Undeveloped land within the urban area would come under pressure for development.
  - There may be an increase in traffic congestion in certain locations.
- Rest of the borough
  - The remaining one third of new growth would be divided between villages and settlements according to their size (subject to sites being available and in line with the current distribution of development).
  - New homes, jobs and services would be created in rural villages.
  - Rural services would benefit from the increased local population.
  - There would be some loss of open countryside around settlements as a result of development pressures.

**Question 12. Which of these five options do you prefer for distributing the borough's growth to 2032?**

*Please explain your answer.*

*If you prefer option 4, can you suggest the location of potential growth points?*

**Question 13. If you do not agree with any of the five options, is there an alternative way of distributing the borough's growth to 2032?**

*Please explain what it is and why you support it. (This could be a combination or variation of the above options or a different approach altogether.)*

## **9. Bedford town centre**

9.1 There has been much discussion in the press in recent years about the future of town centres. Some are predicting the end of the "High Street" as we know it and think that there is too much retail floorspace. Others are saying that there should be more community uses and housing in town centres.

9.2 Town centres across the country have seen an increase in the number of vacant shop units. Although some of this increase is no doubt due to recent financial pressures in the national economy, it is also likely to reflect wider pressures for change in retailing such as competition from internet shopping and large supermarkets. In Bedford the earlier increase in vacancies has been stabilised and recent planning applications indicate that there still is a demand for new shops in Bedford, particularly located out of the town centre where there is more space for large shops with adjacent free car parking. This demand for more shopping floorspace will be further fuelled as population increases over the period of the local plan (as discussed earlier in this document). These various pressures for change appear to point towards a need to consolidate the retail core of the town centre so that there is sufficient space for retailers that need to locate in the town centre. However, at the same time there may be opportunities for surplus shop units on the fringes of the town centre to be occupied by other types of development such as community and leisure facilities or additional housing. By broadening the range of uses in and around the town centre its attractiveness will be enhanced and more people would be encouraged to visit.

9.3 These are complex issues and we are commissioning a study of the current state of the town centre and opportunities to support its viability and vitality. This work will help inform the local plan.

**Question 14. Do you think that the new local plan should encourage a greater variety of uses in the town centre in addition to traditional shopping?**

**Question 15. How should the town centre change to address changes in shopping patterns?**

*Question 16. What do you think the town centre's role should be in the future?*

*Question 17. If there is a demand for new retail floorspace, do you think that the local plan should find space for it in the town centre or should it be provided elsewhere?*

## **10. Call for sites**

10.1 The new local plan will identify land for new housing, including Gypsy and Traveller and Travelling Showpeople sites, employment and other uses, such as retail, leisure, recreation and community uses to meet the needs of the community up to 2032. As part of the Issues and Options stage, landowners and other interested parties are invited to propose sites to be considered by the council for inclusion in the new local plan.

### **How do I submit a site for consideration?**

10.2 If you are aware of any site that may have development potential or you are a landowner, developer or a business and have a site you would like to bring to our attention, please complete a site submission form and send it to us. A site submission form can be found in Appendix 3, or alternatively may be downloaded from the council's website at [www.bedford.gov.uk/localplan2032](http://www.bedford.gov.uk/localplan2032). Forms should be submitted electronically by email where possible, but may also be submitted by post to:

Bedford Borough Council  
Consulting Bedford  
Local Plan 2032  
FREEPOST ANG5840  
Bedford MK40 1ZD

10.3 This is a freepost address and no stamp is required. Potential housing sites should be capable of delivering five or more dwellings as we will not allocate sites for fewer than 5 dwellings in the local plan. Sites for business development should be a minimum of 0.25ha (or if smaller, capable of providing at least 500m<sup>2</sup> of floor space). Your site submission form must be accompanied by a detailed site plan at an appropriate scale identifying the precise site boundaries and highway access. Please make sure you provide all the information required as without it we will not be able to fully consider and assess the site.

## How will the Call for Sites information be used?

10.4 The Call for Sites will help us to:

1. Identify a future supply of land which is deliverable for a range of uses over the plan period as part of the council's evidence base.
2. Gather sufficient information for the Strategic Housing Land Availability Assessment (SHLAA) that we will carry out in order to show that our supply of housing land is sufficient to meet local need to 2032.
3. Inform the preparation of the new local plan.

## What happens next?

10.5 All site submissions received will be published on the council's website in due course. We will review all the sites but it is likely that not all of them will be needed. The process of selecting sites for inclusion in the new local plan will involve a robust assessment of the suitability, availability and deliverability of land for particular uses and a sustainability appraisal of the sites submitted. Furthermore, the selection of sites for inclusion in the new local plan will depend on the spatial option chosen for accommodating growth (Section 8 above) and the findings of various other evidence base studies (paragraph 1.38 above).

## How will submitted sites be assessed?

10.6 National planning policy requires that sites allocated for development in a local plan must be deliverable over the lifetime of the plan. In accordance with government guidance we must assess whether or not sites are suitable, available and achievable including whether a site is economically viable, in order to make a judgement as to whether or not a site is deliverable.

10.7 For this reason the site submission form requires those making submissions to provide site-specific information. To assess site suitability we will consider physical and environmental constraints, such as access, infrastructure, ground conditions, flood risk, pollution, contamination and potential impacts on the landscape, amenity, heritage features and nature conservation. In addition, we must think about the economic viability of a site in terms of its development potential, appropriateness and likely market attractiveness for the type of development proposed as well as the market and industry requirement in the housing market or functional economic market area (market signals). Further information relating to the economic viability of sites may be requested for those sites that are considered to be carried forward in to the new local plan.

10.8 To establish a site's availability for development we will consider any legal or ownership issues, such as multiple ownerships, ransom strips<sup>1</sup> or operational requirements of landowners as part of the assessment. A site can normally be considered available for development if the land is controlled by a developer or land owner who has expressed an intention to sell or develop.

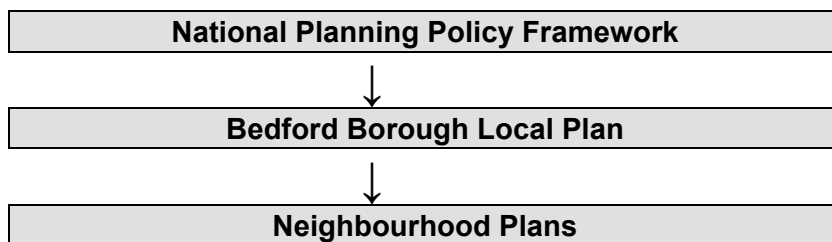
10.9 A site will be considered achievable for development where there is a reasonable prospect of the proposed development coming forward and being implemented over the plan period.

10.10 Where constraints to suitability, availability and achievability have been identified, we will make an assessment of whether these can be overcome.

10.11 If the requested information is not provided by the site promoter then we will be unable to determine whether the requirements of national policy are satisfied and the site will not be considered for allocation.

## 11. Role of neighbourhood planning

11.1 Neighbourhood planning is a new way of allowing local groups and parish councils to have a say in planning their areas by producing their own neighbourhood development plans. The community is free to decide the content of their plans, although they must be land use based and generally deal with proposals that require planning permission. They can include policies dealing with a wide range of issues and allocate land for different uses, such as open space, allotments, housing, business and community facilities. Neighbourhood planning must comply with the strategic policies of the council's local plan and government guidance. Neighbourhood development plans can allocate more development than in the council's local plan, for example to meet local needs, however they cannot be used to block strategic development. The council will advise and help those communities that choose to produce their own neighbourhood development plans.



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<sup>1</sup> See definition in glossary

## 12. Making decisions on planning applications

12.1 Many development management policies that are used to help the council make decisions on planning applications remain 'saved' from the Bedford Borough Local Plan 2002 and a review of them is currently taking place. The intention is that rationalised and updated development management policies will be included in the new local plan.

12.2 The Core Strategy and Rural Issues Plan and the Bedford Town Centre Area Action Plan policies will also be reviewed to see whether any need to be deleted or changed.

12.3 The policies from the Allocations and Designations Local Plan have only recently been adopted (July 2013) and are unlikely to need amending so soon.

12.4 In addition minerals and waste general and environmental policies remain 'saved' from the Bedfordshire and Luton Minerals and Waste Local Plan (2005). These will also need to be reviewed to see whether updated policies should be included within the Local Plan 2032.

12.5 Below is a list of policy/subject areas that new development management policies will cover. We would like to know whether you think this list is appropriate.

12.6 The subject areas that we think the local plan development management policies should address are:

### Natural Environment

- Protection and enhancement of wildlife sites including Sites of Special Scientific Interest, County Wildlife Sites, Local Nature Reserves, Local Geological Sites and Roadside Nature Reserves
- Protection and enhancement of water resources
- Protection and enhancement of existing woodlands, habitats and landscaping
- Protection and enhancement of landscape character

### General Development Principles

- This will include elements such as the design of the buildings; visual impact; traffic; access by public transport, cycles and pedestrians; health and safety; noise; amenity; adverse affects on the natural environment or heritage environment; lighting; public art; advertising; security shutters; cycle parking and car parking
- Landscaping for new developments
- Flooding/drainage/protection and enhancement of water resources
- Mixed uses in residential areas and the town centre

- Aviation safety/bird strike
- Waste Audits

#### Housing Policies – Within the Urban Area Boundary and Settlement Policy Areas

- Site specific policies
- Affordable housing
- Mobile homes/static caravans
- Loss of residential uses for other uses

#### Employment Policies

- Site Specific Policies
- Safeguarding employment land
- Encouragement of tourist facilities such as tourist attractions and tourist accommodation

#### Development in the Open Countryside

- New houses, extensions to existing houses
- The re-use of rural buildings and new farm buildings in the open countryside
- Equestrian developments.
- New agricultural buildings
- Barn Conversions
- Wyboston Land Settlement Association design principles for new development and alterations and extensions to existing dwellings
- Safeguarding the potential of best and most versatile agricultural land

#### Infrastructure, utilities and transport

- Renewable energy (wind farms, solar etc)
- Public transport
- Cycling infrastructure
- Road network
- Pedestrian routes
- Road safety
- Planning obligations

#### Shopping Policies

- Location of new shopping floor space
- Retail floor space outside defined centres
- Farm shops

- Restaurants and takeaways

#### Recreation, Leisure and community facilities

- Loss of community facilities
- Location of new leisure facilities and community facilities

#### New Development Briefs

- Thurleigh Airfield

#### Archaeology and Heritage

- Conservation area policies addressing protecting the existing character, setting, protecting views and open spaces
- Demolition and alteration of buildings within the conservation area
- Listed buildings – demolition, alterations and the setting of listed buildings
- Archaeology – protection and enhancement of sites of archaeological interest, recording of archaeology
- Historic Parks and Gardens – protection and enhancement of these sites
- Advertisements in Conservation Areas

#### Minerals and Waste

- Ancillary minerals and waste development
- Buffer zones
- Restoration and aftercare

12.7 In addition, the general policies in earlier sections may need to make specific reference to minerals and waste requirements.

***Question 18. Do you agree that the list of subject areas above to be considered when assessing planning applications is appropriate? If not, please identify subject areas that should be deleted or added.***

**Bedford Borough Council – Local Plan 2032  
Issues and Options Consultation**

**Response Form**

Please use this response form to give us your views on the Issues and Options Paper for the Bedford Borough Local Plan. It should be read alongside the Issues and Options Paper, which can be downloaded from the council's website [www.bedford.gov.uk/localplan2032](http://www.bedford.gov.uk/localplan2032) together with this response form.

Please send your response to electronically if possible and as a WORD document via email to [planningpolicy@bedford.gov.uk](mailto:planningpolicy@bedford.gov.uk), Alternatively responses can be sent by post to:

Bedford Borough Council  
Consulting Bedford  
Local Plan 2032  
FREEPOST ANG5840  
Bedford MK40 1ZD

This is a freepost address and no stamp is required. All responses (electronic and paper) must be received by 5 pm on **(add date)** .

**This form and any information it contains will be published on the council's website and attributed to source (this may include your name and a reference number). Contact information will also be kept on the Planning Policy database for the purposes of communication on future stages of this and other planning policy documents unless you tell us that you do not want us to contact you further. This would mean that you would not receive notifications about the progress of this, or future, documents.**

<b>CONTACT DETAILS</b>			
	<b>Personal details</b>		<b>Agent's details (if applicable)</b>
Title			
Name			
Job title (if applicable)			
Organisation (if applicable)			
Address			
	Postcode		Postcode
Telephone no			
Email			
If you are using an agent, who would you prefer any correspondence to go to?	Contact agent <input type="checkbox"/>	Contact client <input type="checkbox"/>	Contact both <input type="checkbox"/>
	Land owner <input type="checkbox"/>	Agent <input type="checkbox"/>	Other (please specify) <input type="checkbox"/>

<b>1</b>	Do you agree or disagree with the suggested 2032 end date for the plan?	
	Agree <input type="checkbox"/>  Disagree <input type="checkbox"/>	If you prefer an alternative end date please explain why.
<b>2</b>	Do you agree with the council's approach not to review or replace recently adopted policies and those from earlier plans that are still relevant?	
	Agree <input type="checkbox"/> Disagree <input type="checkbox"/>	
<b>3</b>	Do you agree with the scope of the evidence base set out on page X, paragraph 1.38 of the Issues and Options Paper?	
	Agree <input type="checkbox"/>  Disagree <input type="checkbox"/>	If not, what do you think should be added or deleted?
<b>4</b>	Do you agree that paragraph 4.2 on pages X-X sets out the key themes that the Local Plan 2032 should address?	
	Agree <input type="checkbox"/>  Disagree <input type="checkbox"/>	If you disagree, what do you think should be added to/deleted from the list of themes?
Do you have any specific comments on the themes set out in paragraph 4.2 on pages X-X or the objectives in Appendix 2?		

<b>5</b>	Do you have any comments on the issues that are identified for each theme in paragraph 4.2 on pages X-X?			
	Should any issues be added /deleted?			
<b>6</b>	Do you agree with the range of cross boundary and strategic issues set out in paragraph 5.6 on page X?			
	Agree <input type="checkbox"/> Disagree <input type="checkbox"/>			
<b>7</b>	Are you aware of any cross-boundary or strategic issues that you think should be added to the list?			
<b>8</b>	Do you agree that the 'starting point' range for housing growth (650-815 dwellings completed per year) set out in Table 1 is appropriate as a basis for deciding the level of growth we should have in Bedford Borough to 2032?			
	<table border="1"> <tr> <td>Agree <input type="checkbox"/></td> <td rowspan="2">If you don't agree please explain why.</td> </tr> <tr> <td>Disagree <input type="checkbox"/></td> </tr> </table>	Agree <input type="checkbox"/>	If you don't agree please explain why.	Disagree <input type="checkbox"/>
Agree <input type="checkbox"/>	If you don't agree please explain why.			
Disagree <input type="checkbox"/>				
<b>9</b>	Do you have any comments on the estimate of the number of jobs likely to be needed 2012-2032 (paragraph 6.12)?			

<b>10</b>	Do you have any comments on how the council should take account of market signals? What factors are important and why?	
<b>11</b>	The housing growth options illustrated in Table 2 are based on the mid point of the range recommended in the demographic forecasting report (730 dwellings completed per year). Which of the options A-E most closely fits with the scale of growth you would like to see in the plan?	
	Option A <input type="checkbox"/> Option B <input type="checkbox"/> Option C <input type="checkbox"/> Option D <input type="checkbox"/> Option E <input type="checkbox"/>	Please explain your answer. If you prefer a completely different option to those in the table then please explain how much growth you think should be included in the local plan and why.
<b>12</b>	Which of the five spatial options set out in chapter 8 do you prefer for distributing the borough's growth to 2032?	
	Option 1 <input type="checkbox"/> Option 2 <input type="checkbox"/> Option 3 <input type="checkbox"/> Option 4 <input type="checkbox"/> Option 5 <input type="checkbox"/>	Please explain your answer. If you prefer option 4, can you suggest the location of potential growth points?
<b>13</b>	If you do not agree with any of the five spatial options set out in chapter 8, is there an alternative way of distributing the borough's growth to 2032?	

<b>14</b>	Do you think that the new local plan should encourage a greater variety of uses in the town centre in addition to traditional shopping?
Yes <input type="checkbox"/>	Please explain your answer.
No <input type="checkbox"/>	
<b>15</b>	How should the town centre change to address changes in shopping patterns?
<b>16</b>	What do you think the town centre's role should be in the future?
<b>17</b>	If there is a demand for new retail floorspace, do you think that the local plan should find space for it in the town centre or should it be provided elsewhere?
Yes <input type="checkbox"/>	No <input type="checkbox"/>
<b>18</b>	Do you agree that the list of subject areas (paragraph 12.6) to be considered when assessing planning applications is appropriate?
Yes <input type="checkbox"/>	If not, please identify subject areas that should be deleted or added.
No <input type="checkbox"/>	
<b>19</b>	Do you have any other comments on the Issues and Options Paper?

### Draft Objectives

1. Provide adequate housing which meets the needs of the borough's population over the lifetime of the plan.
2. Support a stronger local economy delivering growth and employment for the benefit of the borough's existing and future residents.
3. Create a distinctive, attractive and multi-functional town centre for the future.
4. Achieve a borough where everybody has access to high quality health, social care and everyday essential services where they need them and the help and infrastructure they need to lead healthy and independent lives.
5. Deliver existing and future infrastructure needs to support growth in both the urban and rural areas of the borough through the implementation of the Community Infrastructure Levy and other means.
6. Improve the borough's transport infrastructure in order to support growth in the local economy and to make the borough more attractive as a place to live and do business. In particular reduce congestion in and around the town centre and make journeys by public transport, walking and cycling more attractive to encourage an increase in more sustainable modes of transport.
7. Develop a strong and multifunctional urban and rural green infrastructure network through protecting, enhancing, extending and linking landscapes, biodiversity sites, heritage sites, green spaces and paths.
8. Support and create a high quality, inclusive and safe built environment which values local character and heritage and is enjoyed by all.
9. Protect and enhance our natural resources including air, soil and water to minimise the impacts of flooding, climate change and pollution.

## BEDFORD BOROUGH LOCAL PLAN CALL FOR SITES SUBMISSION FORM

Please use this form to make a submission to the call for sites process and promote a site for development or redevelopment in the new Bedford Borough Local Plan. **A glossary of terms used is provided at the end of the Site Submission Form.**

This form can be downloaded from the council's website [www.bedford.gov.uk/localplan2032](http://www.bedford.gov.uk/localplan2032) and should be submitted electronically if possible. Please return as a WORD document and use a separate form for each site. Site submission forms may be sent preferably via email to [planningpolicy@bedford.gov.uk](mailto:planningpolicy@bedford.gov.uk), or alternatively by post to:

Bedford Borough Council  
Consulting Bedford  
Local Plan 2032  
FREEPOST ANG5840  
Bedford MK40 1ZD

This is a freepost address and no stamp is required. Your suggested site cannot be considered if you do not send along with the completed submission form a **location plan** which clearly identifies the site boundary and access to a public highway. The council is unable to provide blank plans for this exercise, but Ordnance Survey plans of sites may be obtained via external companies that can be identified through an internet search (there may be a charge for this service).

**Putting a site forward does not guarantee that the council will allocate it or support its development in the future, as all sites will need to be assessed in terms of site suitability, availability and deliverability against relevant planning policy and other considerations.**

**This form and any information it contains will be published on the council's website in due course. Contact information will also be kept on the Planning Policy database for the purposes of communication on future development of this and other planning policy documents unless you tell us that you do not want us to contact you further. This would mean that you would not receive notifications about the progress of this, or future, documents.**

**CONTACT DETAILS**

	Personal details		Agent's details (if applicable)	
Title				
Name				
Job title (if applicable)				
Organisation (if applicable)				
Address				
Postcode				
Telephone no				
Email				
If you are using an agent, who would you prefer any correspondence to go to?	Contact agent <input type="checkbox"/>	Contact client <input type="checkbox"/>	Contact both <input type="checkbox"/>	
Your interest (please indicate)	Land owner <input type="checkbox"/>	Agent <input type="checkbox"/>	Other (please specify) <input type="checkbox"/>	
Current owner's name and address				

SITE DETAILS					
a)	<b>Address of site</b> <i>Please attach location plan on an Ordnance Survey base clearly showing site boundaries and access to an adopted highway.</i>		d)	<b>Adjoining land uses, if known.</b>	North East South West
b)	<b>Gross site area (hectares)</b>		e)	<b>Has the site been developed previously?</b>	Yes <input type="checkbox"/> No <input type="checkbox"/>
c)	<b>Current use of the land</b> <i>Please refer to glossary for definition of use classes.</i>				
2 PROPOSED USE					
2.1	<b>What do you think the site should be used for?</b>				
a)	What is the primary use you propose for the site? <i>Please refer to glossary for definition of use classes.</i>		b)	For mixed use proposals, what further uses do you propose for the site? <i>Please refer to glossary for definition of use classes.</i>	
2.2	<b>What type and scale/quantum of development do you propose on this site?</b> <i>For mixed use proposals complete all relevant sections. For housing proposals please ensure you answer questions 4 – 6.</i>				
a)	<b>For housing (C2/C3 use classes) sites please indicate...</b>				
	The number of dwellings the site could provide.			The type of housing you are proposing	Family houses <input type="checkbox"/> Self-build homes <input type="checkbox"/> Older people housing <input type="checkbox"/> Flats <input type="checkbox"/>
	What density you have assumed?				
	The tenures you are proposing?	Market housing Owner occupied <input type="checkbox"/> Private rented housing <input type="checkbox"/>			
		Affordable Housing Affordable rent <input type="checkbox"/> Shared ownership <input type="checkbox"/> Other <input type="checkbox"/> <i>Please specify</i>			

<b>b) For Gypsy and Traveller sites please indicate...</b>				
	If you are proposing the site as a permanent site or transit site. <i>Please refer to glossary for definition.</i>			If the site is privately owned. Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know <input type="checkbox"/>
	The number of pitches the site could accommodate. <i>Please refer to glossary for definition.</i>			
<b>c) For Travelling Showpeople sites please indicate...</b>				
	The number of plots the site could accommodate. <i>Please refer to glossary for definition.</i>			
<b>d) For employment (B1/B2/B8 use classes) sites please indicate...</b>				
	The type of employment the site could provide.			The gross floor space the site could provide.
<b>e) For retail sites (A1 only) please indicate ...</b>				
	The type of retail you are proposing.			The net floor space that the site could provide.
	The gross floor space that the site could provide.			
<b>f) For hotel (C1 use class) sites please indicate ...</b>				
	The number of hotel rooms the site could accommodate.			
<b>g) For all other types, including leisure and recreation (D2 use class), community uses (D1 use class) and other uses please....</b>				
	Quantify the amount of development you propose.			Fully describe the use here
<b>3 SITE SUITABILITY</b> <i>Please refer to glossary for definition.</i>				
<b>3.1 Are there any access constraints to developing the site?</b>				
	No access to an adopted highway. <i>Please refer to glossary for definition.</i>	<input type="checkbox"/>		Please enclose a map clearly showing how access to an adopted highway will be provided and provide details here
	Current access unsuitable/requires improvement	<input type="checkbox"/>		

<b>3.2</b>	<b>Are there any physical, environmental or other constraints to developing the site?</b>			
<b>a)</b>	Please indicate any known physical constraints to developing the site.			
	Flood risk <input type="checkbox"/>	Ground conditions, such as steep slopes etc. <input type="checkbox"/>		If there are any other known physical constraints, please provide details here.
	Contamination, pollution or hazardous risks <input type="checkbox"/>	Public rights of way within or adjoining the site <input type="checkbox"/>		
<b>b)</b>	Please indicate any known environmental constraints to developing the site.			
	Heritage assets, conservation or archaeological interests <input type="checkbox"/>	Landscape impacts <input type="checkbox"/>		If there are any other known environmental constraints, please give details here.
	Sites of Local Importance <input type="checkbox"/>	Vegetation on the site and water bodies <input type="checkbox"/>		
<b>c)</b>	Please indicate any known infrastructure constraints to developing the site.			
	Drainage <input type="checkbox"/>	Water Supply <input type="checkbox"/>	Telecommunications <input type="checkbox"/>	Sewerage <input type="checkbox"/>
	Gas <input type="checkbox"/>	Electricity <input type="checkbox"/>		
<b>d)</b>	Please provide details of any other known constraints to developing the site, including legal/ownership constraints, such as ransom strips, leases or restrictive covenants, here.		<b>e)</b>	Could the constraints indicated in <i>Section 3 Site Suitability</i> be overcome? If so, please provide details here.
<b>f)</b>	Would the development of the site produce any environmental/amenity impacts, such as noise or odour, on surrounding occupants and neighbours?	Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know <input type="checkbox"/>	<b>g)</b>	If you have ticked yes to question f) please provide details here.
<b>4 AVAILABILITY AND ACHIEVABILITY CONSIDERATIONS</b> <i>Please refer to glossary for definition of terminology.</i>				
<b>a)</b>	Is the site available for development now?	Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know <input type="checkbox"/>	<b>b)</b>	Is the site currently subject to a planning application?
				Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know <input type="checkbox"/>

c)	Is the site currently being marketed?	Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know <input type="checkbox"/>	d)	Please provide details of any evidence of market interest in the type of development you are proposing on this site?
<b>5 DELIVERABILITY AND DEVELOPABILITY CONSIDERATIONS</b>				
a)	Are there any abnormal site development costs that could affect the viability of developing this site, such as costs of dealing with contamination, providing highway access or other infrastructure to the site?	Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know <input type="checkbox"/>	b)	If you have ticked yes to question 5 a), please provide details here.
c)	Do you think there is a reasonable prospect that the development will be delivered within...	1-5 years <input type="checkbox"/> 6-10 years <input type="checkbox"/> 11-15 years <input type="checkbox"/>	d)	Please explain the reasons for your answer to question 5c) here.
e)	When do you expect development to take place? <i>Please specify the anticipated start and completion dates and, for sites that will take more than one year to develop, the amount of development / number of housing units to be completed in each year of the project.</i>			

## Glossary of terms

**Abnormal costs**, including those associated with treatment for contaminated sites or listed buildings, or historic costs associated with brownfield, phased or complex sites.

**Achievability:** A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and sell the development over a certain period.

**Adopted highway:** An adopted highway is a road, footpath or bridleway that is maintained at public expense usually by the Highway Authority.

**Affordable housing:** Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

**Archaeological interest:** There will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.

**Availability:** A site is considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell.

**Community Infrastructure Levy:** A levy which local authorities in England and Wales may charge on most types of new development in their area. CIL charges are based on simple formulae which relate the size of the charge to the size and character of the development paying it. The proceeds of the levy will be spent on local and sub-regional infrastructure to support the development of the area.

**Conservation** (for heritage): The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

**Deliverability:** Assessing the suitability, availability and achievability of sites including whether the site is economically viable will provide the information on which the judgment can be made in the plan-making context as to whether a site can be considered deliverable over the plan period.

**Density:** A quantitative measure of the intensity with which land is occupied by either development or population.

**Developability:** To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

**Duty to co-operate:** A legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation relating to strategic cross boundary matters.

**Gypsies and Travellers:** Persons with a cultural tradition of nomadism or of living in a caravan.

**Heritage asset:** A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing).

**Land contamination:** Where certain criteria are met, a site might be determined 'contaminated land' which has a specific legal definition set out in Part IIA of the Environmental Protection Act. Often this is associated with industrial processes or activities that have now ceased, but where waste products or remaining residues present a hazard to the general environment.

**Older people:** People over retirement age, including the active, newly-retired as well as the very frail elderly, whose housing needs can encompass accessible, adaptable general needs housing for those looking to downsize from family housing and the full range of retirement and specialised housing for those with support or care needs.

**Permanent site:** Sites that are used as a long-term residence by Gypsies and Travellers with a number of amenities, such as water supply, electricity, individual toilets and utility rooms.

**Pitch:** A pitch is the space required to accommodate a Gypsy and Traveller household. Typically a family pitch will provide space for a mobile home and touring caravan, space for parking, and an amenity block.

**Plot:** Is often referred to as yard and involves an area of land on a site/development generally home to one household that is used as long-term residence by Travelling Showpeople. Differs from a Gypsy and Traveller pitch in that it incorporates the space to allow for the storage of equipment.

**Pollution:** Anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.

**Public rights of way:** Public rights of way are open to everyone. They can be roads, paths or tracks, and can run through towns, countryside or private property.

**Previously developed land:** Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential

gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

**Ransom strip:** A ransom strip is a small piece of land retained by the seller of the land when the land is sold. The seller retains the small piece of land (ransom strip) as a mechanism for retaining control over the use and/or development of the land. The ransom strip is commonly between the boundaries of a property and the highway and enables the previous landowner to be able to enforce restrictive covenants.

### **Site of Local Importance**

Includes

- **Local Nature Reserve:** A statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949, and amended by Schedule 11 of the Natural Environment and Rural Communities Act 2006, by principal local authorities. To qualify for Local Nature Reserve status, a site must be of importance for wildlife, geology, education or public enjoyment.
- **County Wildlife Site:** A County Wildlife Site is a site that has been recognized as important for wildlife when assessed against a set of criteria. The selection guidelines consider aspects of the site such as size, diversity, rarity, fragility and recorded history.
- **Local Geological Site:** Local Geological Sites are selected on a local basis according to nationally agreed criteria by voluntary geoconservation groups, such as RIGS (Regionally Important Geological/Geomorphological Sites) Groups and Geology Trusts, which are generally formed by county or unitary authority area in England.

**Site of Special Scientific Interest:** Site of national importance designated by Natural England under the Wildlife and Countryside Act 1981.

**Site Suitability:** A site may be considered suitable for development, if there are no physical, environmental or other constraints to the development of the site that cannot be overcome; it is appropriate and likely to be attractive to the market, contributes to regeneration and there are no amenity impacts by would be occupiers and neighbours that cannot be mitigated.

**Tenure:** Housing tenure describes the legal status under which people have the right to occupy their accommodation. The most common forms of tenure are:

- Home-ownership: this includes homes owned outright and mortgaged
- Renting: this includes social rented housing and private rented housing.

Mixed forms of tenure are also possible.

**Transit site:** Transit sites are authorised sites which are used for short stays by Gypsies and Travellers and have basic amenities and services, which include water supply, shared toilets, washing facilities/utility room, and waste disposal.

**Travelling Showpeople:** Commonly referred to as Showmen, these are a group of occupational Travellers who work on travelling shows and fairs across the UK and abroad.

## Use classes:

### Retail

**A1 Shops** - Shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices (but not sorting offices), pet shops, sandwich bars, showrooms, domestic hire shops, dry cleaners, funeral directors and internet cafes. Employment uses

**B1 Business** - Offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area.

**B2 General industrial** - Use for industrial process other than one falling within class B1 (excluding incineration purposes, chemical treatment or landfill or hazardous waste).

**B8 Storage or distribution** - This class includes open air storage.

### Housing

**C1 Hotels** - Use as a Hotel, Boarding House or Guesthouse, where no significant element of care is provided.

**C2 Residential institutions** - Residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres.

**C3 Dwelling houses** - Covers use by a single person or a family (a couple whether married or not, a person related to one another with members of the family of one of the couple to be treated as members of the family of the other), an employer and certain domestic employees (such as an au pair, nanny, nurse, governess, servant, chauffeur, gardener, secretary and personal assistant), a carer and the person receiving the care and a foster parent and foster child.

### Other

**D2 Assembly and leisure** - Cinema, Concert Hall, Bingo Hall, Dance Hall, Swimming Bath, Skating Rink, Gymnasium, or area for indoor or outdoor sports or recreations, not involving motor vehicles or firearms.

**Viability:** A site is viable if the value generated by its development exceeds the costs of developing it and also provides sufficient incentive for the land to come forward and the development to be undertaken.

## **Bedford Borough Council**

### **LOCAL PLAN 2032**

#### **Bedford Town Centre Discussion Paper**

##### **Introduction**

Bedford Borough Council is preparing a new local plan that will identify the amount and location of new development that will be needed until 2032. The local plan will also contain planning policies that will be used to help make decisions on planning applications.

The Council is asking the public about the main issues that the borough faces. The comments we receive will be used to help us write the draft local plan. We intend to publish the draft local plan later this year when we will invite comments from the public. Any representations we receive will be sent to the Secretary of State who will carry out a formal examination of the draft plan before it is finally adopted, probably in 2016.

However, before we draft the plan, we would like to discuss with key stakeholders what it should say about Bedford town centre. The new local plan will replace policies in the Council's current plan for the town centre: the Bedford Town Centre Area Action Plan, 2008<sup>1</sup>, which now needs updating to respond to new issues.

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1

[http://www.bedford.gov.uk/environment\\_and\\_planning/planning\\_town\\_and\\_country/planning\\_policy\\_its\\_purpose/town\\_centre\\_area\\_action\\_plan.aspx](http://www.bedford.gov.uk/environment_and_planning/planning_town_and_country/planning_policy_its_purpose/town_centre_area_action_plan.aspx)

We have prepared this discussion paper to explore the issues facing the town centre and to consider the approach that the local plan should take. The comments you make at this stage will help us to prepare the policies that will be included in the draft local plan.

*Questions for discussion and comment are shown in boxes throughout this document. Please write or email your response to the address given at the end of this paper before **add date**.*

### **Issues facing Bedford town centre**

There has been much discussion in the press in recent years about the future of town centres. Some are predicting the end of the “High Street” as we know it and think that there is too much retail floorspace. Others are saying that there should be more community uses and housing in town centres in addition to a good range of shops.

Town centres across the country have seen an increase in the number of vacant shop units. Although some of this increase is no doubt due to recent financial pressures in the national economy, it is also likely to reflect wider pressures for change in retailing such as competition from internet shopping and large supermarkets. Furthermore, Bedford suffers from a retailing perspective due to its proximity to larger centres at Milton Keynes and Cambridge. In Bedford the increase in shop vacancies has been stabilised and recent planning applications indicate that there still is a demand for new shops in Bedford, particularly located out of the town centre where there is more space for large shops with adjacent free car parking. This demand for more shopping floorspace may be further fuelled as population increases over the period of the local plan. Changes to planning rules have made it easier for certain buildings to change to other uses without the need to apply for planning permission. For example, changes from shops to offices or restaurants/cafés, and changes from offices to flats are now permitted development (some of these changes are only allowed for a temporary period).

Through the Citizens’ Panel, residents have identified the following key improvements needed to encourage greater use of the town centre: a better variety of, and better quality, shops, a better bus station and more independent shops.

Bedford town centre is an important destination, not just for shopping, but also for culture and various events. With so many people travelling there, traffic congestion is a key challenge, particularly during peak times and during school terms. Some of this is made worse by traffic passing through the centre but, for those visiting the centre, it is important that there is sufficient car parking available. It is also important that there is good access by public transport and for cyclists. A safe and attractive environment for pedestrians must also be considered.

The issues facing Bedford town centre can therefore be summarised as whether there is too much retail floorspace or not enough of the right type, the range of uses allowed in the town centre, competition, access, congestion and the environment.

*Question 1. Do you agree that we have identified the main issues facing Bedford town centre? Are there any others we have missed?*

## **Vision**

It is important that we have a vision for how we want Bedford town centre to be in the future. This does not necessarily have to be a new vision: the Council has produced a number of strategies for the town centre such as the Empty Shops Strategy<sup>2</sup> and the Strategy for Bedford High Street<sup>3</sup>. However, the vision of these documents is best captured in the Bedford Economic Development Strategy<sup>4</sup>. From this document an appropriate vision that remains relevant for the foreseeable future and therefore could be included in the new local plan is –

The traditional heart of the town centre will have been recreated and its townscape and heritage quality maximised, making it a multi-functional destination for people of all ages at all times.

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<sup>2</sup> add link

<sup>3</sup> [http://www.bedford.gov.uk/environment\\_and\\_planning/planning\\_town\\_and\\_country/planning\\_policy\\_its\\_purpose/high\\_street\\_strategy.aspx](http://www.bedford.gov.uk/environment_and_planning/planning_town_and_country/planning_policy_its_purpose/high_street_strategy.aspx)

<sup>4</sup> [http://www.bedford.gov.uk/business/economic\\_development/strategies\\_plans\\_and\\_research.aspx](http://www.bedford.gov.uk/business/economic_development/strategies_plans_and_research.aspx)

Bedford's Growth Plan 2013<sup>5</sup> recognises the critical role that the town centre plays in helping attract and deliver economic growth. It aims to –

Create a distinctive, attractive and multi-functional town centre for the future.

This remains an appropriate objective for the town centre that could be included in the new local plan.

*Question 2. Do you agree that these would be an appropriate vision and objective for the town centre that should be included in the local plan? If not how should they be changed?*

## **Strategy**

One of the priorities of the Bedford Economic Development Strategy<sup>6</sup> is to “improve the town centre by delivering new investment and maximising its townscape and heritage quality”. It states that regeneration of the town centre is a key priority and that this requires major investment in key locations of the bus station and riverside areas. Bedford's retail offer needs to be improved to meet the demands of modern retailers. The High Street in Bedford urgently needs regeneration and restoration to its former glory. The town centre offer must build on its distinctiveness and embrace the changing role of town centres in tomorrow's society. Getting to and from the town centre must be simple and create a positive impression. We need to:

- Build on the Borough's key strengths within the town centre – its unique Charter Market status, townscape, heritage and riverside setting.
- Create a distinctive retail experience in Bedford, not competing with other neighbouring areas, but complementing and building on its strengths.
- Redevelop to optimise key sites within the town centre to provide an improved retail and leisure offer alongside improved transport interchanges.

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<sup>5</sup> [http://www.bedford.gov.uk/business/economic\\_development/strategies\\_plans\\_and\\_research.aspx](http://www.bedford.gov.uk/business/economic_development/strategies_plans_and_research.aspx)

<sup>6</sup> [http://www.bedford.gov.uk/business/economic\\_development/strategies\\_plans\\_and\\_research.aspx](http://www.bedford.gov.uk/business/economic_development/strategies_plans_and_research.aspx)

- Improve traffic management to reduce congestion and tackle poor air quality, promote alternative transport options and improve car parking provision.
- Welcome visitors and shoppers to our town.

One of the aims of Bedford's Growth Plan 2013<sup>7</sup> is to promote the vitality of Bedford's Town Centre. The Growth Plan will achieve this through a series of key actions. These, together with many practical initiatives already being taken, together form part of the ongoing strategy for Bedford town centre.

**Town centre development schemes include:**

- Bus station area – £8.8m replacement of the bus station to improve facilities for passengers, together with new public toilets, improvements to shopfronts and landscaping.
- Riverside North – £50m redevelopment to provide a cinema, hotel, flats, restaurants, shops, open space and footbridge over the river.
- High Street improvements – £3m Townscape Heritage Initiative programme to facilitate repairs to buildings and reinstatement of traditional shopfronts, bringing vacant upper floorspace back into productive use.
- Progress Ford site, The Broadway – planning permission for care home.
- Castle Quay / The Higgins, Bedford – new flats, shops and £5.8m museum / art gallery refurbishment recently completed.

**Car parking improvements include:**

- New surface car parks at Greyfriars and Prebend Street.
- Refurbishment of Allhallows multi-storey car park.
- Two hours free parking on Saturdays and longer opening hours.
- More convenient payment systems at multi-storey car parks.

**Transport and access improvements planned for the town centre include:**

- Completion of the Bedford western bypass with the A428 – A6 link.
- High Street traffic reduction and environmental improvements.

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<sup>7</sup> [http://www.bedford.gov.uk/business/economic\\_development/strategies\\_plans\\_and\\_research.aspx](http://www.bedford.gov.uk/business/economic_development/strategies_plans_and_research.aspx)

- Traffic management modelling and review.
- Railway station remodelling.
- New river crossing planned at Batts Ford.

**Other ongoing initiatives that aim to support Bedford town centre include:**

- Bedford BID – an arrangement for town centre businesses to identify projects and services that will add value.
- Bedford Town Team Portas Pilot initiative – training for businesses, start up grants, shopfront improvement grants and use of empty shops.
- Bedford Borough Empty Shops Strategy – aims to provide a coordinated response between the Council and key stakeholders in reducing empty shops and finding viable uses for them.
- Markets – Bedford a town of markets initiative.
- Building on key cultural strengths and town centre events in line with the Bedford Economic Development Strategy.

*Question 3. Are there any relevant current initiatives for Bedford town centre not mentioned above?*

**Policy approach**

The local plan provides an opportunity to build on these current initiatives and bring planning policy up-to-date in the light of the issues facing Bedford town centre. It will enable a policy approach which recognises Bedford town centre as a destination of choice for a wide range of activities and not just shopping. Although it is not in the Council's power to make specific retailers come to Bedford, we can ensure that there is space for the shops and other uses that want to locate here.

**Consolidation of the retail area**

- We think that it is important to ensure that the central core of the town centre is kept for predominantly retail activity. By maintaining a cluster of good quality shops this will ensure that there is a successful, efficient focus for retailing in the town centre. Policy could be used to prevent changes from retail use within this defined area.

- Surrounding this central core is a more mixed area of shops, café/restaurants, offices and service uses. It is in this area that most vacant units are found. Given the changes in retailing taking place, it would seem appropriate to take a different approach to planning this area. Policy could be used to encourage a wider range of different uses appropriate to the town centre. Although retail uses would still predominate, other uses could be allowed, such as leisure, community and residential uses in appropriate locations. This would ensure that vacancies are kept to a minimum, enhance the attractiveness of the town centre and encourage more people to visit.

*Question 4. Do you agree with the policy approach of consolidating and protecting a retail core whilst allowing a wider range of uses on its fringes? If not, what approach do you think should be taken?*

### **New retail development**

Expected population growth means that there may be a requirement to plan for additional retail floorspace in Bedford. The amount that may be required will be determined in a separate study by consultants employed by the Council. Some of this could be located in or next to the town centre if underused sites are put forward for redevelopment. There may be opportunities to regenerate existing shopping areas if owners agree. Remaining additional floorspace could go to local centres and retail parks in the Bedford urban area. New retail development could provide the larger modern units required by some retail operators.

*Question 5. Are there any areas in or near the town centre where you think that new retail floorspace could be provided if needed?*

### **Bedford's riverside**

Integrating the riverside environment with the town centre will encourage greater use of this prime asset and will enhance the environment of the town centre.

### **Other retail issues**

The local plan also gives the opportunity to update various other borough-wide retail policies such as for farm shops, speculative retail proposals, change of use proposals, amusement centres, take away restaurants, etc.

*Question 6. Do you have any other comments on the policy approach for the town centre and shopping that should be taken in the local plan?*

### **What happens next?**

We will be drafting the local plan later this year and your response to the questions in this document will help us to write new policies for Bedford town centre. The Council supports the active involvement of local groups in planning. This could include through neighbourhood planning whereby a neighbourhood forum produces its own statutory neighbourhood development plan. Please contact the Council if you think that a neighbourhood planning approach is appropriate for the town centre.

**In addition to the specific questions we have asked, we would also like to hear any other comments that you have concerning planning the future of the town centre.**

*Please send your response to the questions highlighted in this document and any other comments to:*

*email – [planningpolicy@bedford.gov.uk](mailto:planningpolicy@bedford.gov.uk)*

*letter – Bedford Borough Council  
Planning Policy Team  
Borough Hall  
Cauldwell Street  
Bedford  
MK42 9AP*

*Responses must be received by **add date**.*

*If you have any questions about the consultation you can also telephone us on 01234 718569.*

### **Questions for response**

Question 1. Do you agree that we have identified the main issues facing Bedford town centre? Are there any others we have missed?

Question 2. Do you agree that these would be an appropriate vision and objective for the town centre that should be included in the local plan? If not how should they be changed?

Question 3. Are there any relevant current initiatives for Bedford town centre not mentioned above?

Question 4. Do you agree with the policy approach of consolidating and protecting a retail core whilst allowing a wider range of uses on its fringes? If not, what approach do you think should be taken?

Question 5. Are there any areas in or near the town centre where you think that new retail floorspace could be provided if needed?

Question 6. Do you have any other comments on the policy approach for the town centre and shopping that should be taken in the local plan?



**BEDFORD**  
BOROUGH COUNCIL

# **Equality Analysis**

**Bedford Borough Local Plan  
Issues and Options Paper and  
Town Centre Discussion Paper**

**December 2013**

## Equality analysis report

**Title of activity: Bedford Borough Local Plan 2032**

### **Background to the activity:**

Following the publication of the National Planning Policy Framework, the Council is required to produce an up-to-date, comprehensive Local Plan that looks ahead for the next 15 years.

The new Local Plan will set out the overarching strategy for housing and employment development in the borough and provide broad directions for locations of growth. It will also deal with site allocations and land designations in the borough, apart from those already identified in the Allocations and Designations Local Plan and sites for minerals and waste development which are allocated through a separate Minerals and Waste Local Plan.

With the formal revocation of the Regional Spatial Strategy, the government has abolished the regional tier in the planning system and the new Local Plan must no longer conform to regional targets for housing and employment. Instead it must for the first time set out objectively assessed local need for housing and broadly matching employment provision. However, it must be consistent with the National Planning Policy Framework, a range of other national policies and guidance documents that the government has published.

It is intended that the new Bedford Borough Local Plan will replace old and out of date policies contained in the Core Strategy and Rural Issues Plan 2008, the Bedford Town Centre Area Action Plan 2008 and the saved policies of Bedford Borough Local Plan 2002.

### **Summary of the activity**

As a first step in the preparation of the new Local Plan the Council has prepared an Issues and Options Paper that sets out the issues and options for the new Local Plan 2032. The Issues and Options Paper is a consultation document which explains why a new Local Plan is being prepared, what it will cover and some of the detail of how the plan is being written. It has been prepared to invite comments and views about the process of plan preparation, some of the main issues that Bedford Borough faces in coming years such as how much growth there should be over the plan period, where it should be located and how those issues might be addressed.

Specifically, the Issues and Options Paper sets out various options involving varying levels of growth to consider the quantum of development that needs to be planned for up 2032. These options illustrate the housing numbers required if the level of growth varied by 5% and 10% above and below the starting point number of 730 dwellings per year.

In addition, the Issues and Options Paper includes 5 options for the spatial distribution of growth to consider where growth should be located and how it should be distributed. Option 1 involves the status quo, which represents a continuation of the existing strategy that concentrates growth in the existing

growth area. Option 2 proposes an expanded growth area with little development in the rest of the borough. Option 3 involves an expanded growth area with some rural growth, particularly in the larger villages. Option 4 proposes that growth is concentrated in the existing growth area and in rural growth points with little development in the rest of the borough. Option 5 proposes to spread development around existing settlements according to their size, which would involve two thirds of growth in the urban area and one third of growth in the rest of the borough. The Issues and Options paper recognises that a combination of these options or some other option may be appropriate.

The Issues and Options Paper also invites the submission of possible development sites in a call for sites to help the Council to identify available land supply for the plan period. These will be subject to a sustainability appraisal of sites that will be carried out separately as part of the site assessment process.

In addition, the Council has prepared a discussion paper to explore the issues facing Bedford town centre and to consider the strategic approach that the local plan should take to town centre development. The document has been prepared specifically for a targeted consultation with the business community and sets out a range of issues facing the town centre, relevant town centre initiatives and a town centre policy proposal for the new Local Plan. The Town Centre Discussion Paper essentially proposes to consolidate the existing retail core, whilst allowing a wider range of uses on the fringes of the town centre.

**Lead officer:** Efua Dadze-Arthur, Senior Planner

**Equality analysis team:**

Efua Dadze-Arthur, Senior Planner, Planning Policy

Gill Cowie, Team Leader, Planning Policy

Stuart Odell, Disability Equality & Access Officer, Building Control

**Relevance**

An equality analysis of this activity is required. ✓

- The outcome(s) of the activity directly and significantly impact on people
- The activity could affect some protected equality groups and not others
- The activity could affect protected equality groups differently
- The activity presents a high risk to the Borough Council's public reputation
- The activity relates to an area where there are known inequalities

## Level 1 Equality Analysis

### Scope of equality analysis

#### Impacted by activity:

The Issues and Options Paper and Town Centre Discussion Paper will impact on all residents in the Borough in addition to those who work in or visit Bedford.

Accordingly, it may potentially affect all members of the community who are covered by the protected characteristics as defined by the Equality Act 2010. These include age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex (gender), gender reassignment, sexual orientation, marriage and civil partnership groups as well as those with multiple protected characteristics.

The new local plan will result in new development happening and the changes taking place throughout the plan period may affect residents, visitors and employees across the borough in a variety of ways, for example through new housing or employment development, new schools, new shops, roads or cycle ways and open spaces. The various options for the new Local Plan will lead to policies and strategy that change the character of land so that residents, visitors and employees within or near areas where growth is concentrated and land allocated for development may experience increased economic and social opportunity. Conversely, decreased environmental opportunity may potentially be experienced by residents and employees as result of the adverse effects of development, such as poor air quality or increased noise and traffic.

The new Local Plan will also make provision for Gypsy and Traveller accommodation and Travelling Showpeople accommodation, and the Issues and Options Paper explains that evidence base studies are currently being carried out to determine Gypsy and Traveller and Traveller Showpeople accommodation needs over the plan period. Whilst Gypsies and Travellers for planning purposes are defined in terms of their nomadic life style, Romany Gypsies and Irish Travellers are legally recognised as ethnic groups and therefore also protected by legislation. Therefore, for the purpose of this Equality Analysis Gypsies and Travellers are considered within the context of race groups.

Primary stakeholders for the new Local Plan include in particular residents, businesses, employers and employees, community groups, landowners, developers and the statutory consultation bodies for local plans.

#### Protected equality groups:

At this stage the options for the level and spatial distribution of growth are being considered. All spatial options involve a proportion of growth in the urban area of Bedford and Kempston. In addition, proposed town centre policy focuses development in the existing town centre, which constitutes the core of the urban area.

In the urban area the population is on average much younger, likely to include a higher proportion of mothers and mothers-to-be and comprise a larger proportion of faith and BME communities. In addition, the urban wards Castle, Harpur, Cauldwell, Kingsbrook, Kempston North and Goldington that are amongst the 20% most deprived nationally are located in the urban area of Bedford and Kempston.

It may therefore be considered that race groups, pregnancy and maternity groups, the younger age groups and those suffering from deprivation may potentially be

disproportionately affected by planned growth as result of their geographic concentration in the urban area.

**General Equality Duties:**

The location of new development and the levels of growth are anticipated to be most relevant to the following equality aim:

- Advance equality of opportunity between people who share a protected characteristic and those who do not

**Evidence**

**What relevant evidence is there about the activity?**

- Population Census 2001 and 2011, ONS
- Census and Statistics Information, BBC
- Joint Commissioning Strategy for People with Physical Disabilities 2010-2013, BBC / NHS
- Bedfordshire Black and Minority Ethnic Accommodation Needs Study 2003, De Montfort University
- Indices of Deprivation 2013, BBC
- Gypsy and Traveller Accommodation Assessment 2012
- Equality monitoring information of consultation across the wider Council in 2011
- Draft consultation and pre-submission consultation on the Allocations and Designations Local Plan Equality Monitoring Information
- National research reports
- Core Strategy and Rural Issues Plan 2008
- Town Centre Area Action Plan 2008
- Allocations and Designations Local Plan 2013
- Bedford Borough Economic Development Strategy 2011-14
- Bedford Borough Growth Plan 2013

**What does this evidence tell you about the different protected groups?**

**General**

The borough is home to an estimated total of 157,800 residents (in 2011) who make up approximately 65,800 households. Population numbers have increased by approximately 6.5 % from 148,100 in 2001. Estimates are that the Borough's population will increase to more than 170,000 in 2021, an increase of approximately 8% between 2011 and 2021.

**Age**

The population of the urban area is much younger on average than the rural area, with only 45% of the population aged 40+ compared to 56% in rural areas. While the Borough's total population is forecast to increase by approximately 8% between 2011 and 2021, the older population will increase at a much higher rate with the 65+ and 80+ age groups both rising by almost 30%. In particular, the 85+ population is forecast to rise by almost 47%. This will represent a significant ageing of the population.

**Disability**

In 2008 there were an estimated 7,590 residents in the borough with a moderate physical disability. It is estimated that there were 2,924 adults in 2009 with a learning disability and that this number will rise to 3,075 by 2013 and to 3,318 by 2020. The prevalence of physical disability increases with age. In 2001 28% of Borough

residents aged 60-64 reported that they had a long term illness or disability. This rose to 49% for those aged 75-79 and to 66% for those aged 85-89. As population growth is expected to be concentrated in older age groups and therefore there is likely to be an increase in the proportion of disabled people. There is no evidence that disabled people are concentrated in any particular part of the urban area and it is assumed that they are randomly distributed.

### **Gender reassignment**

78.3 % of all respondents to consultations across the wider Council in 2011 indicated that the gender was still same as it was at birth. There is no evidence that this proportion is representative of the borough and that members of this group are concentrated in any particular area. It is assumed that they are randomly distributed.

### **Pregnancy and maternity**

Between 2001 and 2007 the number of births increased gradually, but rose significantly in 2008-2010. This can be largely attributed to mothers born outside the UK who accounted for 78% of the total increase between 2001 and 2010. Although the number of births to mothers born in the New European Union countries (countries which joined the EU in 2004) has increased greatly since 2004, the number of births to mothers born in Asia remains the largest group. This group, together with mothers born in Africa and the rest of the world, makes up 60% of total births. Therefore the distribution of the pregnancy and maternity group is assumed to largely mirror that of Black and Minority Ethnic (BME) groups (see below).

### **Race**

The 2011 Census indicates that 28.5% of the population are from around 100 different Black and Minority Ethnic (BME) groups (defined as all ethnic groups other than White British). This compares to 20.2% in England (though only 13.9% when the London Boroughs are excluded) and 14.7% in the East of England. The Borough's BME population increased significantly between 2001 and 2011, while the White British population declined by almost 6,900. There were substantial increases in all BME groups, including Asian and Asian British (48.6%) and Black and Black British (61.3%). In 2001 the BME population was concentrated in the urban area and particularly in the wards of Queens Park (57.8%) and Cauldwell (43.6%).

Gypsies and Travellers experience multiple disadvantages as is demonstrated by indicators relating to health, education and other issues. The Gypsy and Traveller Accommodation Assessment 2012 demonstrates that existing sites and those with planning permission will meet need to 2021. The existing Gypsy and Traveller community is located on the Council's own site at Kempston Hardwick (16 pitches), which is currently being extended by another 6 pitches, and a number of privately owned sites in the rural areas. Planning permission has been granted for a further 14 pitches at Meadow Lane.

### **Religion or belief**

The 2001 Census indicated that religious belief for the borough was as follows: Christian 69%, Muslim 3%, Hindu 2%, Sikh 2%, Jewish 0%, Buddhist 0%, other 0%, no religion 15%, not stated 9%. There is a strong correlation between certain religions and race: for example, many Pakistanis and Bangladeshis are Moslems, while many Indians are Hindu or Sikh. In 2001 Asian or Asian British Indians were concentrated in the wards of Cauldwell (14.9%), Kempston East (10.5%), Kempston North (10.0%), Queens Park (8.8%) and Kempston South (7.4%), while Asian or Asian British Pakistanis and Bangladeshis were concentrated in Queens Park (19.5%) and (7.8%).

**Sex (gender)**

The 2011 Census indicates that out of 158,000 residents, 80, 200 are women. There is no evidence that members of this group are concentrated in any particular area and it is assumed that they are randomly distributed.

**Sexual orientation**

The ONS Integrated Household Survey April 2010 – March 2011 indicates that out of approximately 490,000 adults 1.5% in the United Kingdom identified themselves as gay/lesbian or bisexual, 94 % of adults identified themselves as heterosexual/straight and 0.5 per cent of the surveyed population, approximately 239,000 adults, identified themselves as Bisexual. There is no evidence that members of this group are concentrated in any particular area and it is assumed that they are randomly distributed.

**Marriage & civil partnership (in relation to eliminating discrimination)**

The provisional number of civil partnerships in the UK in 2011 was 6,795, an increase of 6.4 per cent since 2010. There is no evidence that members of this group are concentrated in any particular area and it is assumed that they are randomly distributed.

**Other identified groups**

The highest ranked areas for deprivation in the Borough are all in the urban area. They are located within the following wards – Castle, Harpur, Cauldwell, Kingsbrook, Goldington and Kempston North. The wards with the highest levels of unemployment are all in the urban area. They are as follows – Castle, Cauldwell, Queens Park, Kingsbrook, Goldington, Harpur, Kempston North, Kempston West.

What further research or data do you need to fill any gaps in your understanding of the potential or known effects of the activity?

None.

Have you thought about commissioning new data or research?

Not required.

**Adverse affect on equality**

The implementation of the new local plan is likely to produce a range of environmental effects that commonly arise from new development such as noise, traffic congestion and poor air quality. These will be the same for equality groups as for all other sections of the community and should be mitigated through criteria-based policy.

**Age**

As all strategy options involve either a concentration of growth or some growth in the existing urban area of Bedford and Kempston, it may be considered that in particular the on average younger population in the urban area may become affected by decreased environmental opportunity, including traffic, noise and poor air quality as result of future development.

Where spatial strategy options involve little or no growth outside the existing or an expanded growth area, the residents in the rural areas that are on average older and

may be adversely affected through increasing levels of deprivation in terms of access to essential services such as a GP, primary school, post office or supermarkets, as well as access to suitably specialised older persons housing, community facilities as well as other benefits resulting from growth. Similarly, little or no growth in rest of the borough may also result in reduced access to education provision, skills development, leisure and recreation facilities as well as employment opportunities for the younger age groups that are resident in the rural areas.

**Disability**

The Issues and Options makes no specific reference to disability. However, it does seek to minimise the need to travel by directing development to sustainable locations. Where spatial strategy options involve little or no growth outside the existing or an expanded growth area, disabled persons resident in the rural area may potentially experience reduced access to essential services such as a GP, primary school, post office or supermarkets, and public transport. However, there is no evidence to suggest that disabled people are geographically concentrated in the rural area.

**Gender reassignment**

Gender reassigned people are not concentrated in any particular area and it is assumed that they are randomly distributed. There is no evidence that demonstrates that the Issues and Options Paper adversely affects this protected equality group, other than through decreased environmental opportunity resulting from new development in growth locations and reduced access to housing, employment and services in locations with little or no growth in the same way than the rest of the population.

**Pregnancy and maternity**

Mothers and mothers-to-be are primarily prevalent amongst the younger age groups that are concentrated in the urban area. In addition, BME women being accountable for the significant rise in the number of birth may indicate that there are higher proportions of mothers and mothers-to-be amongst the BME communities that are concentrated in the urban wards. As all or some growth is likely to be focussed in the urban area, mothers and mothers-to-be may potentially be disproportionately affected by the environmental effects of new development, such as increased traffic and congestion, loss of open land, pollution, poor air quality and noise from traffic and construction. Those mothers and mothers-to-be that are resident in locations with little or no growth may additionally experience increased deprivation in terms of access to essential every-day-services services, including childcare facilities and schools as well as have limited access to employment opportunities for those wishing to return to work.

**Race and faith**

The evidence suggests a strong correlation between faith groups and BME groups. The concentration of the faith groups and BME population in the urban area means that members of these protected equality groups may be in particular affected by decreased environmental opportunity as result of new development that is likely to focussed in the urban area, such as traffic and congestion, loss of open land, pollution, poor air quality and noise, such as from traffic and construction. Those faith and BME groups that are resident in locations with little or no growth may additionally experience increased income, education and skills deprivation as well as reduced access to affordable and suitable housing, essential services and rural public transport.

**Sex (gender)**

Men or women are not concentrated in any particular area and it is assumed that they are randomly distributed. There is no evidence that demonstrates that the Issues and Options Paper adversely affects this protected equality group, other than

through decreased environmental opportunity resulting from new development in growth locations and reduced access to housing, employment and services in locations with little or no growth in the same way than the rest of the population.

### **Sexual orientation**

Sexual orientation groups are not concentrated in any particular area and it is assumed that they are randomly distributed. There is no evidence that demonstrates that the Issues and Options Paper adversely affects this protected equality group, other than through decreased environmental opportunity resulting from new development in growth locations and reduced access to housing, employment and services in locations with little or no growth in the same way than the rest of the population.

### **Marriage & civil partnership (in relation to eliminating discrimination)**

Marriage and civil partnership groups are not concentrated in any particular area and it is assumed that they are randomly distributed. There is no evidence that demonstrates that the Issues and Options Paper adversely affects this protected equality group, other than through decreased environmental opportunity resulting from new development in growth locations and reduced access to housing, employment and services in locations with little or no growth in the same way than the rest of the population.

### **Other identified groups experiencing barriers to access – Those suffering deprivation**

Chapter 4 of Issues and Options Paper acknowledges that 18% of the working age population are unemployed, seeking work or are economically inactive. Those suffering income, education and skills deprivation as well as health inequalities are primarily concentrated in Castle, Cauldwell, Queens Park, Kingsbrook, Goldington, Harpur, Kempston North and Kempston West, whilst two thirds of the rural population suffer deprivation in terms of access to essential services. Where spatial strategy options involve little or no growth in the rural areas, rural deprivation may potentially worsen for those already deprived in terms of access to every-day services. Where spatial strategy options involve growth in the urban area, those suffering income, education and skills deprivation as well as poor health and life expectancy may potentially be disproportionately affected by decreased environmental opportunity resulting from new development.

### **Positive affect on equality**

The Issues and Options Paper for the new Local Plan provides equal opportunities to all protected equality groups to shape the future of the borough, influence how much growth should take place, where this growth should be located and the types of development they would like to see in the borough. In addition, it enables members of protected equality groups to put forward sites for consideration as potential allocations which might help meet their needs, for example, places of worship to serve religion and belief groups.

### **Age**

Chapter 4 of the Issues and Options Paper acknowledges that the number of people over 80 has increased by 29% and identifies the need for affordable housing and suitably specialised accommodation for elderly people as an issue for the new Local Plan. It further acknowledges that almost 16% of pensioners in the borough are income deprived and provides the opportunity to put forward land for potential housing development through the call for sites, including older people housing.

Given that on average the existing urban population is younger than the rural population and proposed town centre policy as well as spatial strategy options involve a concentration of growth in the urban area, it may be considered that the younger population could potentially become disproportionately affected by increased social and economic opportunity as result of future development, including access to housing, jobs, services, community

Where spatial options involve growth, and particularly higher levels of growth, in the rural areas that are home to a larger proportion of older people, age groups may be considered to be positively affected through greater access to essential services such as a GP, primary school, post office or supermarkets, and public transport.

In addition, the Issues and Options Paper acknowledges that 20% of children in the borough are raised in income deprived households and that the significant rise in the number of births, which is likely to result in a rise in preschool and younger school age populations, may place pressure on existing education facilities. The Issues and Options may positively affect younger age groups, including children suffering deprivation in terms of income, education and skills through facilitating the delivery of new development that is likely to make financial contributions to education provision and improve the local skills base. It is therefore considered that the Issues and Options Paper seeks to specifically cater for the needs of age groups and delivers practical benefits for elderly people and young people.

### **Disability**

Neither the Issues and Options Paper, nor the Town Centre Discussion Paper does specifically refer to disability. However, both seek to reduce the need to travel and increase accessibility through locating development in sustainable locations, expanding the range of uses and consolidating existing retail provision in the town centre. Facilitating the delivery of new development that is likely to require highway, transportation and public realm improvements, the Issues and Options Paper encourages continuity of movement, improved links between communities, access to and connectivity within places.

Evidence suggests that the prevalence of disability increases with age and that the rural population is on average older than the urban population. Where spatial strategy options involve growth in the urban and rural areas, disabled persons in these locations may potentially experience positive impact from new development, including suitable housing, new employment opportunities and improved accessibility.

### **Race and faith groups**

Chapter 4 of the Issues and Options Paper acknowledges the significant proportion of BME communities in the urban area (28.5%), and particularly in the wards that are most deprived wards in terms of income, education and skills deprivation. Where spatial strategy options involve growth in the existing urban area, BME and religious communities may be positively affected by increased social and economic opportunity, including community infrastructure that promotes the right to worship, express religious belief and enables enable people to come together, promote social integration and interaction between people of different ethnicities and faiths. In addition, the greater the level of growth and quantum of development, the greater the level of social and economic opportunity that may be potentially experienced by race and faith groups in terms of access to suitable housing, employment and income.

### **Gender reassignment**

Gender reassigned people are not concentrated in any particular area and it is assumed that they are randomly distributed. There is no evidence that demonstrates that the Issues and Options Paper or the Town Centre Discussion Paper positively affects this protected equality group, other than through improved social and economic opportunity resulting from new development in growth locations and the town centre in the same way than the rest of the population.

### **Sex (Gender)**

Men or women are not concentrated in any particular area and it is assumed that they are randomly distributed. There is no evidence that demonstrates that the Issues and Options Paper positively affects gender groups, other than through improved social and economic opportunity resulting from new development in growth locations and the town centre in the same way than the rest of the population.

### **Sexual orientation**

Sexual orientation groups are not concentrated in any particular area and it is assumed that they are randomly distributed. There is no evidence that demonstrates that the Issues and Options Paper or the Town Centre Discussion Paper positively affects sexual orientation groups, other than through improved social and economic opportunity resulting from new development in growth locations and the town centre in the same way than the rest of the population.

### **Marriage and civil partnership**

Marriage and civil partnership groups are not concentrated in any particular area and it is assumed that they are randomly distributed. There is no evidence that demonstrates that the Issues and Options Paper or the Town Centre Discussion Paper positively affects marriage and civil partnerships, other than through improved social and economic opportunity resulting from new development in growth locations and the town centre in the same way than the rest of the population.

### **Other identified groups experiencing barriers to access – Those suffering deprivation**

Chapter 4 of Issues and Options Paper acknowledges that 18% of the working age population are unemployed, seeking work or are economically inactive. Those suffering income, education and skills deprivation as well as health inequalities are primarily concentrated in Castle, Cauldwell, Queens Park, Kingsbrook, Goldington, Harpur, Kempston North and Kempston West, whilst two thirds of the rural population suffer deprivation in terms of access to essential services.

Where spatial strategy options concentrates growth in the urban area, those suffering deprivation are likely be positively affected by the economic strengthening of growth concentrations through greater access to affordable housing and employment opportunities. Town centre development especially has the potential to significantly enhance the economic strengths of the urban area and reduce unemployment and income deprivation in the urban area. In addition, new development is likely to encourage the provision of new health facilities that will benefit residents in the deprived wards, whose life expectancy is on average 9 years lower than in the rest of the borough. Where spatial strategy options involve growth in the rural areas, improved accessibility to services may potentially benefit those suffering deprivation.

### **1. Eliminate discrimination, harassment and victimisation**

The Issues and Options Paper and Town Centre Discussion Paper promote mixed

communities and improved public realm, contributing positively to the Council's duty to provide services that have due regard to the need to eliminate unlawful discrimination, harassment and victimisation. Improved public realm resulting from new development may benefit the prevention of discrimination arising from protected characteristics, such as disability, sexual orientation or race.

## **2. Advance equality of opportunity**

The Issues and Options Paper acknowledges a range of issues that are relevant to equality groups and seeks to address these, where possible, through encouraging growth over and above what is required to meet local needs and proposing options for distributing that growth.

Both the Issues and Options Paper and the Town Centre Discussion Paper make a major contribution to social equality in promoting accessibility to provisions such as community centres, open spaces, employment and training opportunities, and in particular affordable housing, for all equality groups.

In addition, the Issues and Options Paper provides equal opportunity for all sections of the community to put forward potential development sites, affording landowners, developers and businesses who are members of equality groups the opportunity to promote their site through the local plan process.

## **3. Foster good relations (including tackling prejudice and promoting understanding between different protected groups)**

The Issues and Options Paper invites views from all sections of the local communities. It fosters understanding, whilst seeking consensus on key issues affecting the borough and potential options to address these. At the next stage the draft plan is likely to further contribute towards this aim through proposing land allocations for uses that enable people of different background to meet and socially interact, e.g. recreational and community facilities, and encourage understanding between different groups.

## **4. Promote positive attitudes towards disabled people**

The Issues and Options Paper and the Town Centre Discussion Paper is likely to have a neutral effect on this aim for any of the protected equality groups.

## **5. Take account of disabled people's disabilities**

The Issues and Options Paper is likely to have a neutral effect on this aim for any of the protected equality groups.

### **Summary of analysis**

The Issues and Options Paper and the Town Centre Discussion Paper have been considered in relation to their potential impacts on protected equality groups identified in relevant legislation, including age, disability, race, gender, religion and belief, sexual orientation, gender reassignment, pregnancy and maternity, marriage and civil partnerships, and those experiencing deprivation. A range of potential impacts both positive and negative have been identified. Negative effects on equality groups relate primarily to the environmental impacts of development, such as poor air quality, traffic and congestion or noise. These can be mitigated through the inclusion

of appropriate policy criteria, where necessary, and proposals for mitigation are being developed as part of the sustainability appraisal of the Local Plan.

Seeking local views and input on a range of issues and setting out options for growth, the Issues and Options Paper and Town Centre Discussion Paper have a wide range of potential positive effects on all equality groups and significantly contributes to social equality in promoting inclusiveness and accessibility to provisions such as community centres, open spaces, employment and training opportunities, and in particular affordable housing. The groups that are likely to particularly benefit are those concentrated in or near the urban area and locations for growth. These are age groups, race and religious groups, mothers and mothers-to-be groups and those suffering deprivation.

### **Analysis findings**

Whilst the analysis has found that development resulting from the new Local Plan may potentially produce decreased environmental opportunity, particularly in growth locations, the range of positive effects and opportunities (social, economic and environmental) afforded to equality groups through growth orientated development are considered to substantially outweigh the negative impacts.

The analysis demonstrated that the Issues and Options Paper and the Town Centre Discussion Paper have taken all appropriate opportunities to advance equality and foster good relations between groups. Potential negative environmental effects on equality groups resulting from new development and growth should be appropriately mitigated.

### **Monitoring and review**

Once adopted, the impact of the New Local Plan 2032 will be monitored on a yearly basis through the Authority's Monitoring Report.

## Action plan

Issues	Actions	Target date	Lead	Resources required
Adverse impact	Ensure that any environmental impacts from development are appropriately mitigated through inclusion of relevant policy criteria.	Sept 2015	Gill Cowie	Planning Policy Team
Engagement and involvement	Where possible engage equality groups as part of the public consultation at the Issues and Options and Plan for Submission stage	Feb 2014 (Issues and Options) Sept 2015 (Plan for Submission)	Gill Cowie	Planning Policy Team
Equality information, data and evidence	<ul style="list-style-type: none"> <li>Review impact of Local Plan for Submission through Equality Analysis</li> <li>Review impact of Local Plan when adopted through Authorities' Monitoring Report</li> </ul>	Sept 2015  Post Dec 2016 - ongoing	Efua Dadze-Arthur  Gareth Draper	Planning Policy Team



