

RECORD OF EXECUTIVE DECISION TAKEN BY AN EXECUTIVE MEMBER

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

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

1. Description of decision

- (1) That Full Council be recommended to approve the commencement of a review of the Minerals and Waste Local Plan: Strategic Sites and Policies (adopted 2014) and the saved policies of the Bedfordshire and Luton Minerals and Waste Local Plan (adopted 2005), as per the timings in Section 5 of the attached report, and that the new plan will completely replace both existing documents.**
- (2) That Full Council be recommended to support a joint-working approach to the preparation of the Minerals and Waste Local Plan alongside Central Bedfordshire and Luton Borough Councils.**

2. Date of decision

23 June 2025

3. Reasons for decision

The purpose of this report is to formally seek approval from the Portfolio Holder for Economic Growth, Planning & Prosperity that the Planning Service undertakes a policy review of the Minerals and Waste Local Plan and seek agreement to commence plan-making functions for minerals and waste planning policy in co-operation with Central Bedfordshire and Luton councils.

4. Alternatives considered and rejected

Alternatives to reviewing the plan in co-operation with Central Bedfordshire and Luton (Option 3) are:

- Option 1: do not review the plan; and
- Option 2: review the plan independently of Central Bedfordshire and Luton
 - a) delivered via 'in house' resources
 - b) procuring external resources to draft a Minerals and Waste Plan for Bedford delivered via another public sector organisation/Local Authority
 - c) procuring external resources to draft a Minerals and Waste Plan for Bedford delivered via a Consultancy

Option 1 will likely result in successful challenge that our policies are 'out-of-date' and increase the likelihood of legal challenge to decision-making.

Option 2a will need Bedford to meet all of the financial costs with likely limited resources/expertise while doing so. This would be the most resource intensive for Bedford.

Option 2b will likely result in resource which initially has less local knowledge of the area and has a high risk that such a service is not available to be procured within England.

Option 2c will likely be extremely cost prohibitive to the Council and timescales may be significantly affected by competing work priorities and limited local knowledge.

Therefore, on reflection of the possible alternatives, Option 3 is considered to be the most favourable to the Council

5. How decision is to be funded

The costs associated with the preparation of the Minerals and Waste Local Plan for Bedford Borough, Central Bedfordshire and Luton are to be funded by Bedford Borough Council on the basis of 30% of the total costs (funded through the Plans and Strategies Reserve across multiple financial years). This is expected to total £117,929.00 between the period 2025/2026 to 2028/2029.

6. Conflicts of interest

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

The Mayor has been consulted on this decision

23 June 2025

Tom Wootton

Signed: *Andrea Spice* Date:

23 June 2025

Name of Decision Taker:

Cllr. Andrea Spice

Portfolio Holder for Economic Growth, Planning & Prosperity

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

Date decision published:24June2025.....

Date decision can be implemented if not called in:2July2025.....

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

Bedford Borough Council – Portfolio Holder Decision

Date of Decision: 23 June 2025

Report by: Priority Project Manager

Subject: MINERALS AND WASTE LOCAL PLAN

1. EXECUTIVE SUMMARY

- 1.1 This report seeks approval from the Portfolio Holder for Economic Growth, Planning & Prosperity for the Planning Service to undertake a policy review of the Minerals and Waste Local Plan and seek agreement to commence plan-making functions for minerals and waste planning policy in co-operation with Central Bedfordshire and Luton councils. If satisfied the Portfolio Holder is asked to recommend the report to Full Council to ratify the decision as per Part 3, Table 1, para 6, bullet points 6 of our constitution which references Section 28 of the Planning and Compulsory Purchase Act 2004 to the preparation of a Joint Development Plan document.
- 1.2 As well as being a local planning authority, Bedford Borough Council are also a waste planning authority and minerals planning authority. The Council is therefore required to maintain an adequate supply of minerals to meet local and national development needs. We are also required to ensure sufficient capacity exists to manage waste close to where it arises (for both residents and businesses).
- 1.3 Since the latest [minerals and waste plan was adopted \(2014\)](#), significant permitted reserves of sand and gravel have been extracted. We will need to allocate additional land to ensure sufficient reserves are available to meet future development needs. Minerals are commonly used for: concrete and mortar, playing pitches, roads, glass and pharmaceuticals. The local plan will provide coverage for policies to determine minerals and waste planning applications and guiding environmental restoration of sites, in combination with any relevant environmental policies from the [Bedford Local Plan 2030](#), [Bedford Borough Allocations and Designations plan \(2013\)](#) and the saved policies of the [Local Plan 2002](#) (or any subsequent plan(s)).

- 1.4 It should be noted that Central Bedfordshire Council currently provide a minerals and waste Development Management planning service to Bedford (determining planning applications and monitoring compliance of active sites). The development of the Minerals and Waste Local Plan work enables greater joint working between the three Bedfordshire authorities (Bedford, Central Bedfordshire and Luton) so the service can be operated efficiently and allows each council to achieve significant cost savings by 'sharing' these specialist minerals and waste resources. It also shows recognition that minerals and waste planning is strategic in nature and therefore wider cooperation is imperative (as well as beneficial in terms of duty to cooperate risks).

2. RECOMMENDATIONS

- 2.1 **The Portfolio Holder for Economic Growth, Planning & Prosperity is asked to consider this report, and if satisfied, recommend to Full Council to:**
- (a) **Approve, as per the timings in Section 5, the commencement of a review of the Minerals and Waste Local Plan: Strategic Sites and Policies (adopted 2014) and the saved policies of the Bedfordshire and Luton Minerals and Waste Local Plan (adopted 2005) and that the new plan completely replaces both documents.**
 - (b) **Approve a joint-working approach to prepare a Minerals and Waste Local Plan alongside Central Bedfordshire and Luton Borough Councils.**

3. REASONS FOR RECOMMENDATIONS

- 3.1 Bedford Borough Council are a local planning, waste planning and minerals planning authority. As such Bedford Borough have a statutory requirement to keep our development plans up-to-date and meet future needs, as detailed further in section 7.1: Legal issues and 7.2: Policy issues. We have disregarded Option 1 (do not review the plan - detailed below) as it represents a failure to meet this requirement and is therefore not a legally compliant course of action.

Option 3: review the plan in co-operation with Central Bedfordshire and Luton

- 3.2 Option 3 is the preferred option. This will ensure that our policies are up-to-date and puts us in the best position to determine minerals and waste planning applications. This option will produce a joint local plan that meets the needs of all three of the Bedfordshire authorities [i.e. Bedford, Central Bedfordshire and Luton]. Joint working will allow each council to share the costs of plan-making (plan writing, as well as development of the evidence base).

It has been estimated that joint working will allow us to prepare a joint local plan for approximately 30% of the cost of working alone and the approach also realises cost benefits for Central Bedfordshire and Luton Councils. Working together provides an opportunity to take a more strategic approach to minerals and waste concerns across Bedfordshire (and continues to reflect the manner minerals data has historically been aggregated together for Bedfordshire through the East of England Aggregate Working Party (data is aggregated to maintain confidentiality of sensitive information)).

Some knowledge sharing and skill enhancement to Bedford's planning policy team is possible through this approach. It will also help us to meet the duty to cooperate; demonstrating that we are working proactively and are in ongoing collaboration to address cross-boundary concerns for Bedfordshire. Central Bedfordshire Council has a 'vested interest' ensuring efficient timescales and in limiting risk throughout the delivery of a timely Local Plan to replace the saved policies and current 2014 plan in Bedfordshire i.e. there is anticipated to be relatively limited 'competing' work priorities which could create timetable 'slippage'. There are efficiency and knowledge benefits in having Central Bedfordshire Council provide both a Minerals and Waste Plan Making and Development Management planning service to Bedford. It should be noted that the annual cost of plan making to Bedford is less than the cost of employing a full-time officer in-house to deliver this workstream over a 4-year period (which could cost Bedford around £320,000 in staffing costs alone). Although it should be noted while Central Bedfordshire will lead on the work, there would still be a draw on Bedford's staff resources to support option 3.

4. THE CURRENT POSITION

- 4.1 [Regulation 10A of The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#) require local planning authorities to review local plans every five years.
- 4.2 Some of the environmental policies from the [2005 Bedfordshire and Luton Minerals and Waste Local Plan](#) still apply in Bedford (these are: Policies W17 (Land Raising) and W22 (Safeguarding existing sites)). This proposed Minerals and Waste Local Plan intends to replace both the Minerals and Waste Local Plan 2005 and Strategic Sites and Policies 2014 plans in their entirety, bringing all relevant policies into one up-to-date document. This enables the new policies to reflect changes to national legislation, regulations and guidance and take into account any new waste technologies.
- 4.3 Since the adoption of the minerals and waste plan in 2014 (titled: [Strategic Sites and Policies](#)), [authority monitoring reports](#) have been produced to identify the effectiveness of its policies. No formal minerals and waste local plan review has been initiated/undertaken in this time. Such a review was proposed in 2019/20 by the three authorities but was postponed due to capacity and financial issues within the administrative area. A full-time officer has since been recruited at Central Bedfordshire to take this work forward.

- 4.4 Paragraph 226 of the National Planning Policy Framework (NPPF) requires minerals planning authorities to maintain reserves of at least 7 years for sand and gravel. The latest [annual report produced by the East of England Aggregates Working Party](#) identified 11.3 years of permitted reserves across Bedfordshire (surveying was undertaken at the end of 2023). If mineral extraction continues at these historic rates/trends (and no new sites come forward), we could reach the ‘minimum level’¹ of reserves within Bedfordshire by 2027/28. Preparing a new Minerals and Waste Local Plan will allow us to identify and allocate land to maintain a sufficient supply of reserves and have a new Minerals and Waste Local Plan in place before our total reserves become less than the required 7 years landbank.
- 4.5 Reserves of other minerals found in Bedfordshire (commonly clay and chalk) are also required to be maintained (where there is demand/active industrial workings which require further certainty of supply and to support the level of investment required in the county). The national policy requirement to maintain a supply of chalk relate to supporting the production of cement and providing support for the brick industry by maintaining relevant clay reserves i.e. where proven to be used as ‘industrial mineral’ the levels of landbank should be between 10 and 25 years worth of each specified industrial mineral².
- 4.6 The [National Planning Policy for Waste](#) requires waste planning authorities to identify sufficient opportunities to meet the identified needs of their area for the management of the various waste streams. The [latest monitoring report](#) of the plan identifies that we are a net importer of most waste types, indicating that there is capacity within existing facilities to meet future growth³ (subject to other authority areas providing additional capacity to enable a change to these historic import/export flows).
- 4.7 A waste capacity study is programmed to be undertaken later this year, which will provide detailed evidence on the level of need for any new infrastructure within the area. This need will be informed by the latest growth rates being proposed through Bedford, Central Bedfordshire and Luton ‘district level’ local plans (current and future land uses will influence the levels of waste generation from both household and commercial uses). Central Bedfordshire Council officers indicate that discussions will be held with waste management teams on the need for land to support local waste management i.e. if household waste recycling centres capacity/layouts are effective/failing currently or expected to in the future when accounting for future growth projections, etc.

¹ As per paragraph 226(f) of the NPPF

² Detailed in paragraph 227(c) of the NPPF

³ It is noted that waste movements will be influenced by commercial factors including the cost of waste disposal (supply verses demand), duty of care, collaboration/ partnerships, economies of scale, the market for recycled materials and the availability of different waste treatment technologies.

5. **DETAILS**

- 5.1 Agreeing the principle of the preparation of a Minerals and Waste Local Plan will allow us to progress the plan against the following milestones [key dates and consultations stages are set out below – these are held within a signed Service Level Agreement (SLA) between Central Bedfordshire and Bedford]. It is intended that relevant elements of this timeline will be incorporated into BBC's revised Local Development Scheme (LDS) in due course.

Broad timings	Stage
Summer 2025 to spring 2026	Evidence gathering (desktop)
Spring 2026	Council to approve initial consultation
Early summer 2026	Consultation on issues and options as well as a call for potential development sites
Autumn 2026 to spring 2027	Appraising options and drafting the plan
Summer 2027	Council to approve consultation on the draft plan
Autumn 2027	Consultation on the draft plan
Spring 2028	Council to approve the submission of the plan for examination
Summer 2028 ⁴	Examination of the minerals and waste local plan by the Planning Inspectorate
Autumn 2028 ⁴	Consultation on modifications proposed through examination (main or minor modifications)
Winter 2028 ⁴	Full Council to adopt the plan on behalf of BBC

⁴ Timings post submission stage are estimates. The duration could vary on the precise timelines of the examination and adoption phases once an independent Planning Inspector is appointed

- 5.2 It is worth noting that the timetable above may require alteration to accommodate the Governments proposed 'Gateways' [also referred to as 'checkpoints'] or if plans are to be prepared and adopted within 30 months [proposed as part of the Planning Reforms] is brought forward into legislation/Regulations.
- 5.3 Consultation responses from residents and interested parties will be gathered at each consultation stage and be used to inform the scope and detail of the emerging plan. In time, a consultation statement will be prepared to explain how consultation has been carried out and who was consulted at each stage of the process.

6. ALTERNATIVES CONSIDERED AND REJECTED

- 6.1 The preferred option is Option 3: review the plan in co-operation with Central Bedfordshire and Luton. The alternative options are:
- Option 1: do not review the plan
 - Option 2: review the plan independently of Central Bedfordshire and Luton:
 - a) delivered via 'in house' resources
 - b) delivered via another public sector organisation/Local Authority
 - c) delivered via a Consultancy

Option 1: do not review the plan

- 6.2 This option will likely result in successful challenge that our policies are 'out-of-date', which will reduce our ability to determine/influence planning applications and increase the likelihood of legal challenge to decision-making (as reliance will be weighted more heavily on national planning policy/guidance over adopted local policy/guidance) or a general increase in appeals made against Bedford. This option provides the greatest risk for reputational damage. It will increase the likelihood of unplanned and unsuitable waste and mineral extraction operations being granted on appeal. It should be noted that there would still be a draw on Bedford's staff resources to support option 1, although this would not be through the delivery of a plan-led system but instead in defending the Councils policy position as/when speculative applications are received.

Option 2a: review the plan independently of Central Bedfordshire and Luton delivered via 'in house' resources

- 6.3 This could be undertaken either separately to or subsumed as part of the 'district matters' local plan. This option could produce a plan that meets our own needs, but we would need to meet all of the financial costs with likely limited officer resources/expertise to do so. The option may require significant reliance to be placed upon ad hoc external consultant support for development of pieces of the evidence base and plan writing, as required. If all 'district planning policy matters' and 'Minerals and Waste matters' were combined into one local plan, there could be negative implications on prompt timetabling/delivery of this plan-led approach as

limited resources would be 'stretched' further across broader (and niche) planning matters (with the same timetable/deadlines scheduled for completion). This option would also mean that all of our identified need should be met within the administrative area of Bedford without the shared benefit of reliance upon other potential sites in both Central Bedfordshire and Luton (i.e. Rookery South Energy Recovery Facility) – unless negotiated by the Council via the 'Duty to Cooperate'. This option may also require more resourcing within the Planning Policy team due to the niche expertise required for Minerals and Waste planning and well as a greater emphasis being placed upon engaging with neighbouring authorities under the 'Duty to Cooperate' [with Central Bedfordshire and Luton] and negotiating with other administrative areas to meet our needs (or vice versa). If required, a new officer would incur both salary and 'on costs' to finance a specific minerals and waste planning post within Bedford. It should be noted that to support option 2a would require the greatest draw on Bedford's staff resources.

Option 2b: review the plan independently of Central Bedfordshire and Luton by procuring external resources to draft a Minerals and Waste Plan for Bedford delivered via another public sector organisation/Local Authority

- 6.4 There may be other Local Authorities within England with existing Minerals and Waste resources who are seeking additional income streams and could offer to provide a service to Bedford. Although there are no known authorities at this time (either having been identified and approached by BBC or where we have been approached directly by a planning authority promoting such a service). It may be that such a service is not available to be procured. There is likely to be a greater reliance on Bedford officers as the resource procured (at least initially) are likely to have less local knowledge of the area, there will be no beneficial development of minerals and waste expertise (through provision of both Development Management and Plan Making services in Bedford by one provider i.e. 'cross pollination' of sites knowledge, local issues and monitoring data) or the same benefits of joint working with neighbouring authorities i.e. duty to cooperate benefits with Central Bedfordshire and Luton. We would not be able to rely upon existing or future site/resource opportunities provided within neighbouring administrative areas. There is more likely to be limited knowledge or skill development within Bedford through this option and more limited data sharing back to Bedford with this approach. The third-party authority may need to externally subcontract aspects of the niche evidence drafting. There will likely need to be resourcing from Bedford to project manage and checking/challenge the work received or to input local knowledge into in the drafts received to ensure the outputs are quality controlled/relevant. Therefore, it should be noted that there would still be a draw on Bedford's staff resources to support option 2b.

Option 2c: review the plan independently of Central Bedfordshire and Luton by procuring external resources to draft a Minerals and Waste Plan for Bedford delivered via a Consultancy

- 6.5 The whole plan could be procured to an external consultancy to draft all the evidence base, supporting documentation, plan writing and support/attend the examination for Bedford. Although there are no known organisations at this time (either having been identified and approached by BBC or where we have been approached directly by third parties promoting such a service). There is likely to be less local detailed knowledge of the area (at least initially), no beneficial development of minerals and waste expertise

(through provision of both Development Management and Plan Making services in Bedford by one provider i.e. ‘cross pollination’ of sites knowledge, local issues and monitoring data) or the same benefits of joint working with neighbouring authorities i.e. duty to cooperate benefits with Central Bedfordshire and Luton. We would not be able to rely upon existing or future site/resource opportunities provided within neighbouring administrative areas. The cost of this option is likely to be prohibitive to the Council and timescales may be affected by competing work priorities. There is more likely to be very limited to no knowledge or skill development within Bedford through this option and likely limited data sharing back to Bedford with this approach. The preferred bidder may need to subcontract aspects of the niche evidence drafting (which Bedford may have limited ability to influence the selection process for (dependant on contractual details)) and it is more likely to result in ‘off the shelf drafting/approaches’. If this transpired to be the case, it could result in becoming a ‘resource drain’ for Bedford’s officers either in terms of enhanced project management and checking/challenging the work received or in terms of needing to input local knowledge and greater detail into in the drafts received to ensure the outputs are quality controlled/relevant. Therefore, it should be noted that there would be a draw on Bedford’s staff resources to support option 2c.

7. KEY IMPLICATIONS

7.1 Legal Issues – relevant legal power

As described in the [Planning and Compulsory Purchase Act 2004](#) (as amended) a local plan is a local development document. The preparation of local development documents must be carried out in accordance with [Section 19 of this Act](#) and the [Town and Country Planning \(Local Planning\)\(England\) Regulations 2012 \(as amended\)](#). Stages of plan making include⁵:

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

⁵ It is noted that as part of the planning Reforms ‘Local Plan Gateway’ assessments and a maximum 30 month timeline are being considered

The Council's recently updated [Statement of Community Involvement \(SCI\)](#) provides the basis for information giving and consultation on a local plan at its various stages. Compliance with this SCI is a legal test when the plan is examined⁶.

We are a local planning, waste planning and minerals planning authority. As such we have a statutory requirement to keep our development plans up-to-date and meeting future needs. Option 1 (do not review the plan (as set out above)) represents a failure to meet this requirement and is therefore not a legally compliant course of action. The [National Planning Policy Framework](#) (NPPF) explains that the planning system should be genuinely plan-led (paragraph 15). Plan preparation needs to be undertaken in the context of the Framework, supporting guidance and the local plan system set out by the [Localism Act 2011](#), [Levelling Up and Regeneration Act](#) and if it receives Royal Assent the [emerging Planning and Infrastructure Bill 2024-25](#).

Previously it was agreed that there is no requirement for a formal joint board or committee to be set-up to manage decisions and the joint arrangements for the Minerals and Waste Local Plan with Central Bedfordshire and Luton (see Part 3, Table 1, para 6, bullet points 7 of our constitution⁷). Therefore, each council will retain their sovereign authority to approve formal plan-making stages, scrutinise proposals and adopt the new minerals and waste local plan independently of each other.

The minerals and waste local plan will be governed through Service Level Agreements (SLAs) approved by senior managers at each authority⁸. The plan preparation will be delivered through Central Bedfordshire's existing shared service for minerals and waste development that has been in place for many years (including Governance and Management Boards). Central Bedfordshire will lead on the work, with support from officers at Bedford and Luton.

7.2 Policy Issues

Local plans set a vision and framework for future development to meet local needs and opportunities and to reflect national priorities, particularly in relation to minerals and waste site allocations, safeguarding areas/sites, protection of the environment and identification/delivery of infrastructure. They are a critical tool to positively guide development decisions.

⁶ As part of the development of a Joint Plan, compliance with Central Bedfordshire and Luton's Statement of Community Involvement requirements would also be reflected within their administrative areas

⁷ As detailed within: [Section 29 of the Planning and Compulsory Purchase Act](#)

⁸ To be reviewed regularly (as necessary)

National planning policy is contained in the [National Planning Policy Framework \(NPPF\)](#). It explains that the planning system should be genuinely plan-led and that plans should, amongst other things, provide a platform for local people to shape their surroundings (NPPF, para 15). Plans should be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees (NPPF, para 16).

The NPPF expects local planning authorities to review plans to assess whether they need updating at least once every five years and then update them more frequently, as necessary. The Bedfordshire and Luton Minerals and Waste Local Plan was adopted January 2005 (two saved policies remain for Bedford - Policy W17 and Policy W22) and the Minerals and Waste Local Plan: Strategic Sites and Policies was adopted in January 2014. Therefore, a review/replacement Local Plan is due.

Officers can limit risks by applying relevant project management approaches, such as the [Planning Advisory Service's Local Plan Route Mapper](#) (or equivalent) as a 'checklist' to make sure that legal compliance and soundness matters have been addressed.

7.3 Resource Issues

The cost of preparing the Minerals and Waste Local Plan will be met from a call on the Plans and Strategies Reserve across the plan preparation period from 2025/26-2028/29. Central Bedfordshire Council have costed that the total cost of the Minerals and Waste Local Plan is £393,093.00. For Bedford (30% of total costs) is expected to cost a total of £117,929.00⁹ (2025/26 to 2028/29). It is worth noting that the anticipated charges presented by Central Bedfordshire Council includes limited Planning Inspectorate costs¹⁰ and therefore limited support from an independent Programme Officer¹⁰ to manage the examination process.

As part of Option 3, it has been agreed between Bedford, Central Bedfordshire and Luton Councils to proportionally split the total anticipated cost of preparing the local plan across the 3 authorities. Proportional splits have been in place since the County Council was disbanded between Central Bedfordshire and Bedford (on the basis of 60/40%) when the shared planning service was created between the two Councils. The 60/40 split between Central Bedfordshire and Bedford was generated on the basis that this was a fair reflection on the level of planning activity (minerals and waste) between the two authorities. This proposed plan-making split of costs follows this historic split of costs/principle for Bedfordshire, but now seeks to incorporate Luton also. As such Luton is

⁹ Cost broken down by year: 2025/26: £26,681.00. 2026/27: £24,898.00. 2027/28: £25,492.00. 2028/29: £40,858.00. Totalling: £117,929.00.

Note: Officer time costs are forecast to increase by 2.5% each year (already factored in). • Costs for 2026/27 onwards are likely to increase through inflation (not factored in).

¹⁰ Based upon a maximum of two days for hearing sessions

proposed to take a share of the costs that would have historically otherwise been allocated/made payable to Bedford. Luton is proposed a smaller proportion of the costs on the basis there is relatively little minerals and waste activity within the borough.

Therefore for Bedford, this proposed proportional split equates to 30%¹¹ of the total cost of Minerals and Waste plan making for the 3 authorities [lead by Central Bedfordshire's Minerals and Waste Team]. 30% is currently estimated at: £117,929¹² (costed for 2025/26 to the end of 2028/29). The costs for 2025/26 have already been identified as a 'draw' within the budget for the Plans and Strategies Reserve.

The Central Bedfordshire Council: Minerals and Waste Planning team will lead on the preparation of the joint local plan for Bedford, Central Bedfordshire and Luton but progression will rely on input from other teams across the Council(s). It is anticipated that staff resources will be drawn from other teams where appropriate i.e. to prepare and present the Council's evidence in support of the plan's policies and approach.

The preparation of the minerals and waste local plan provides an opportunity for Bedford to put council-owned land forward/bring forward (if appropriate) our own land for minerals extraction and/or waste management through the 'Call For Sites'/allocation process. If considered suitable, this could potentially generate revenue for the Council.

7.4 Risks

Joint working will bring significant cost reductions for Bedford, as well as for Central Bedfordshire and Luton. The potential cost of not being able to manage minerals and waste planning applications in line with an up-to-date plan (and subsequent risk of planning appeals and enforcement) represents a potential future financial pressure. This risk is present in option 1 (do not review the plan) but is addressed by options 2 and 3 (review the plan independently of Central Bedfordshire and Luton or jointly review the plan).

Central Bedfordshire's Executive agreed to pursue the shared Plan at their meeting on 3rd June 2025 and are awaiting a Full Council decision¹³. There is a risk that Luton¹⁴ might not decide to engage in this work, however officers feel that this risk has been mitigated through Central Bedfordshire Council signing Service Level Agreements directly with both supporting authorities (Bedford

¹¹ Splits for the other two authorities are: Central Bedfordshire Council = 60% who will contribute £235,856. Luton Council = 10% who will contribute £39,308.

¹² Costs for 2026/27 onwards are likely to increase through inflation (not factored in)

¹³ Proposed for Full Council on: 17th July

¹⁴ Discussed and supported at Overview and Scrutiny Board 16th June. Initially listed for Executive on 23rd June 2025 - item withdrawn from meeting and rescheduled for next Full Council meeting

and Luton). It should also be noted that all Bedfordshire Councils face the same drivers to move forward with these matters as we do (as set out in this report). By going to Full Council at each authority, we will be taking a consistent approach: reducing the risk of challenge.

The development of the evidence base and plan is reliant on waste generation assumptions which are likely to be based upon future/anticipated housing requirements and economic forecasting. Therefore risks/timelines may be increased if the 'housing requirements' for an area are not stable/clear nationally or if there are uncertainties in future economic forecasting (which may be impacted in the short term by the announcement of Universal and also the discontinuation of the [East of England Forecasting Model](#)).

The Borough Council is a statutory consultee for the review of the Minerals and Waste Local Plan which is being prepared jointly by Central Bedfordshire and Luton Borough Councils [lead on by Central Bedfordshire]. There is the potential for risk that the Councils are not aligned in how the strategy for the local plan develops i.e. if there is a conflict between minerals/waste options/allocations and emerging strategic housing proposals.

Option 3 (review the plan in co-operation with Central Bedfordshire and Luton) would generate significant cost savings for Bedford Borough over the anticipated costs for Option 2 (review the plan independently of Central Bedfordshire and Luton). The potential difference in costs between Option 2 and 3 are forecast to amount to £310,000 over the life of the project.

Failure to adhere to the local plan timetable would bring with it consequences for the borough; in those circumstances there would be a high risk that the Council would lose control over the scale and location of development. On balance therefore, the Council must carry on with the preparation of this Minerals and Waste Local Plan if it is to continue to plan effectively in accordance with local policies and priorities.

7.5 Environmental Implications

There are no identified implications at this stage. The new local plan will be accompanied by a sustainability appraisal in order to appraise its social, environmental and economic effects by considering the broader subject of environmental impact and mitigation. Sustainability appraisal includes the legal requirement to undertake a strategic environmental assessment. The review will include a sustainability appraisal that will consider such implications. Initially a 'scoping report' for this should be prepared prior to initial consultation so it is an integrated part of the plan preparation process.

In addition, a Habitats Regulations Assessment will be prepared to assess the impact of the plan on the National Site Network (previously known as Natura 2000 sites). The Assessment will conclude if the plan results in any adverse effects on any designated sites, either alone or in combination with other plans and projects. Whilst no sites in the National Site Network are present within the borough, sites are found close by, for example: associated with the River Great Ouse east of St Ives and River Nene to the north and west of the borough.

7.6 Equalities Impact

In preparing this report, due consideration has been given to the 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. The Council's adopted [Statement of Community Involvement \(SCI\)](#) sets minimum requirements for consultation.

A relevance test for equality has been completed. An Equality Analysis is not required at this consultation stage however an Equality Analysis will be prepared to accompany the local plan.

There are no identified implications at this stage. The Minerals and Waste Local Plan will include a sustainability appraisal that will consider such implications. A scoping report for this will be prepared prior to initial consultation.

7.7 Impact on Families

With regards to the Family Test, the Minerals and Waste Local Plan will have no impact on families.

7.8 Community Safety and Resilience

The Minerals and Waste Plan will have no impact on community safety and resilience.

7.9 Impact on Health and Wellbeing

The Minerals and Waste Local Plan will not have a direct impact on health and wellbeing.

8. **SUMMARY OF CONSULTATIONS AND OUTCOME**

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

Cllr Andrea Spice, Portfolio Holder for Economic Growth, Planning & Prosperity (including Town Centres)

Corporate Leadership Team

- Service Director Regulation, Housing & Customer Contact
- Manager for Legal
- Chief Officer for Finance

8.2 No adverse comments have been received. Proposed edits have been taken into account. It is noted that the Plan will in due course be subjected to two statutory consultations.

9. **WARD COUNCILLOR VIEWS**

9.1 This report does not relate to an individual ward.

10. **CONTACTS AND REFERENCES**

Report Contact Officer:	<i>Jean Brunning, Manager for Planning Strategy & Policy</i> jean.brunning@bedford.gov.uk <i>Rebecca Williams, Principal Planning Policy Officer</i> rebecca.williams@bedford.gov.uk
Declarations of Interest by the Report Author:	N/A
File Reference:	<i>Minerals and Waste Local Plan Review</i>
Previous Relevant Minutes:	<i>None</i>

Background Papers:	<p>No background papers have been prepared at this stage. Evidence on the local context and likely direction of travel will be provided in spring 2026 to allow the Council to consider whether to commence with public engagement. A Consultation Plan may be appended at this time.</p> <p>Relevant national policy/guidance is: <i>National Planning Policy Framework (NPPF)</i> <i>Planning Practice Guidance:</i> <ul style="list-style-type: none"> • <i>Minerals</i> • <i>Waste</i> <i>National Planning Policy for Waste</i> <i>Waste Management Plan for England</i> </p>
Appendices:	<i>None</i>