

## Agenda Item 6

For publication

### Bedford Borough Council – Executive

Date - 10 January 2018

Report by - Mayor, Portfolio Holder for Community Safety and Regulatory Services and Chief Officer Planning and Highways

Subject - Local Plan 2035

#### **1. Executive Summary**

- 1.1 The purpose of this report is to:
  - Advise Members of the main issues raised during the earlier Local Plan 2035 Regulation 18 public consultation in relation to the Council's draft preferred development strategy,
  - Advise Members of the main changes that have been made to the development strategy in response to the consultation comments and taking account of further technical work,
  - Present an overview of the Local Plan 2035 'Plan for Submission' and its evidence base,
  - Outline the purpose and scope of the forthcoming consultation exercise, and next steps in the preparation of the plan.

#### **2. Recommendations**

**Executive is recommended to consider, and if satisfied:**

- (a) Agree the Officer responses to the consultation comments received during the 2017 Local Plan 2035 consultation (Appendix A).
- (b) Subject to any amendments Executive may wish to make, agree the Local Plan 2035 'Plan for Submission' (Appendix B) and its evidence base documents (Appendix C) for the purposes of public consultation.
- (c) Authorise the Chief Officer Planning and Highways to make essential minor textual changes to the Draft Local Plan 2035 'Plan for Submission' and evidence base documents which support the plan.

3. **Reasons for Recommendations**

3.1 To enable the preparation of the Local Plan 2035 to progress in accordance with the recently updated Local Development Scheme.

4. **Key Implications**

(a)

**Policy**

Local Plans set a vision and framework for future development to meet local needs and opportunities and reflect national priorities, particularly in relation to housing, the economy, identification and delivery of infrastructure and protection of the environment. They are a critical tool to positively guide development decisions. The National Planning Policy Framework expects local planning authorities to keep plans up-to-date and also review them in whole or in part in response to changing circumstances.

The Local Plan 2035 will enable policies in currently adopted (but older) plans to be replaced. The vast majority of policies in the Bedford Borough Local Plan 2002, Core Strategy and Rural Issues Plan 2008 and Bedford Town Centre Area Action Plan 2008 will be replaced by policies in the Local Plan 2035. Some policies in the more recently adopted Allocations and Designations Local Plan 2013 will also be replaced in order to bring them up to date. More detail on the replacement of policies is provided in an appendix to the local plan. The Local Plan 2035 will also make provision through the allocation of development sites to meet the Borough's needs to 2035.

The adoption of policies in the Local Plan 2035 will secure a suite of planning policy documents (together making up the statutory development plan) prepared and adopted post the publication of the National Planning Policy Framework in 2012. This will mean that the Council's adopted policies will carry full weight when making planning decisions.

The Local Plan will align closely with other Council key plans and strategies, for example the Council's Corporate Plan, the Joint Strategic Needs Assessment and the emerging Growth Plan.

(b)

**Legal Issues**

One of the core planning principles set out in the National Planning Policy Framework refers to the fact 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 Framework, supporting guidance and the local plan system introduced by the Localism Act 2011. The Local Plan 2035 must also reflect the preparation of Neighbourhood Plans and the part they play in delivering the development plan for the borough.

This consultation complies with Regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012. It is more commonly known as the publication stage of the plan making process.

**(c) Resource Implications**

The cost of preparing the Local Plan 2035 has been and will continue to be met within existing budgets and from a call on the Plans and Strategies Reserve. Staff resources will be drawn from other teams where appropriate to help with the administration of the consultation process.

**(d) Risk Implications**

Failure to progress and ultimately adopt the Local Plan 2035 would mean that the Council's planning policies would come under increasing challenge on the basis that they are out of date. This particularly applies to those development plan policies adopted before the National Planning Policy Framework was published in 2012.

Failure to progress the plan may result in the Government taking over the Council's plan making process. The Government has already signalled that it intends to step-in to put plans in place in those parts of the country where speedy progress is not being made. At this stage Bedford Borough Council is not on the intervention list, though as parts of the development plan pre-date the National Planning Policy Framework our progress is being carefully monitored.

Failure to progress and ultimately adopt the plan to put in place sufficient sites for growth may result in the Council being unable to demonstrate a five year land supply. If this happened, the Council would lose the ability to use its development strategy to control the location of housing growth. It would weaken the Council's position at planning appeals and could result in unplanned speculative development in non-preferred locations.

The Government is proposing to update the National Planning Policy Framework to change the way that growth needs are calculated. Plans submitted by the end of March 2018 will benefit from transitional arrangements, meaning that if submission by this date can be achieved Bedford Borough Council can retain it's currently agreed Objectively Assessed Housing Need of 19,000 dwellings as the basis for the local plan. Beyond that date (or the update of the National Planning Policy Framework, whichever is later) the Government's new methodology will have to be used to calculate the plan's dwelling requirement. The Government's recent consultation suggests that for Bedford Borough this will be over 25,000 dwellings. There is a risk that a large number of responses will be received to the regulation 19 consultation and there will be insufficient time to process and consider them in the time afforded by the expedited timetable. Were this to happen, the plan would be delayed whilst the evidence base is updated to support the higher growth number and additional development sites are identified.

**(e) Environmental Implications**

The Local Plan 2035 has a number of policies to protect and enhance the environment. The plan's sustainability appraisal considers the broader subject of environmental impact and mitigation.

The consultation itself has very limited environmental impact: the use of digital methods of consultation will be maximised.

**(f) Equalities Impact**

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.

Recommendation (b) has 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 will arise from the sustainability appraisal of the local plan.

Policies in the Local Plan 2035 may have a wide range of potential positive effects on all equality groups and significantly contribute to social equality in promoting inclusiveness and accessibility to provisions such as open spaces, employment and training/job opportunities, and in particular affordable housing. The groups that are likely to benefit particularly are those concentrated in or near locations for growth where most development is likely to take place. These are age groups, race and religious groups, mothers and mothers-to-be groups and those suffering deprivation.

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 outweigh appreciably the negative impacts.

The analysis demonstrated that the consultation paper has 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

### 1. Main issues raised during the 2017 consultation (Regulation 18 consultation)

- 5.1 Work started on the Local Plan 2035 in 2013 following the adoption of the Allocations and Designations Local Plan.
- 5.2 The consultation exercises that have been carried out are summarised in the following table. These have been undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning)(England) Regulations 2012 and the Council's adopted Statement of Community Involvement. Details of the consultations and the relevant documents remain on the Borough Council's web site for reference purposes.

13 <sup>th</sup> January 2014 to 14 <sup>th</sup> February 2014	Issues and Options Consultation. The first step in deciding the plan's content. First 'call for sites' took place.
19 <sup>th</sup> October 2015 to 14 <sup>th</sup> December 2015	General levels and distribution of development. Technical studies available for comment. Second 'Call for sites' took place; new settlement proposals invited.
4 <sup>th</sup> January 2016 to 29 <sup>th</sup> February 2016	Updated Strategic Housing Market Assessment and other technical papers available for comment.
24 <sup>th</sup> April 2017 to 9 June 2017	Preferred development strategy. New settlement proposals, development sites and technical papers available for comment.

- 5.3 At each stage the consultation results have helped to shape the emerging local plan. Following consideration of the 2014 consultation comments, the Council made the decision to openly invite the submission of new settlement-scale proposals. As a result several large scale proposals were put forward during the 2015 consultation period. Four submissions were considered worthy of further consideration and following discussion with the Department for Communities and Local Government, the timetable for the preparation of the local plan was extended to allow the assessment of the four potential new settlements to take place.
- 5.4 The main purpose of the 2017 consultation was to invite comments on a development strategy incorporating growth in one or more new settlement locations. At that stage no preferred new settlement(s) had been selected on the basis that the consultation comments would help to inform the selection process. Technical documents underpinning the development strategy were also published for consultation purposes.

5.5 Over 1,850 responses were received. The majority of responses (87%) were from residents and most people responded digitally (71%). The subject matter was covered in twelve questions though it was also possible to make general comments on other matters. Most responses came from urban, edge of urban and some of the larger village locations which reflects the fact that these were where larger development allocations were proposed.

5.6 There was particular concern about

- The overall amount of growth, particularly housing growth
- The potential for new housing to be delivered without supporting infrastructure
- Potential loss of countryside and agricultural land
- Further large scale expansion of the Bedford/Kempston urban area and worries about coalescence with nearby villages
- The impact of additional car traffic arising from one or more of the three northern new settlements on the A6 south bound
- Additional rat running through villages to avoid the A6
- The scale of growth proposed in the Group 1 villages
- Lack of proposals for small scale growth in smaller villages

5.7 There was support for

- Making the best use of suitable brownfield sites, including Stewartby Brickworks
- Making the best use of suitable urban sites
- Having a policy that allowed growth of an appropriate scale in smaller villages where there was public support
- Allowing local people to decide locations for growth
- Not allocating further development in locations that have seen recent growth
- The scale of growth proposed in the Group 2 villages
- The allocation of Local Green Spaces

5.8 The above bullets give only a brief overview. The original redacted consultation responses are posted on the Council's web site along with a document summarising the consultation response. Members are invited to view the detail at [www.bedford.gov.uk/localplan2035](http://www.bedford.gov.uk/localplan2035). In addition tables of comments organised by question and with officer response have been prepared. These are available with other evidence documents for Members' consideration.

**2. The main changes that have been made to the local plan development strategy in response to the consultation comments and taking account of further technical work**

5.9 The results of the consultation have been fully considered by officers and the broad approach to the development strategy has not changed. The Local Plan's focus for growth remains the urban area, suitable edge of urban sites and the larger villages where community facilities are available or can be provided or improved to serve new housing areas. The strategy continues to incorporate growth in a new garden village (at Colworth, near Sharnbrook) which will provide capacity in this local plan period and beyond. It also supports the redevelopment of land at the former Stewartby Brickworks.

5.10 However, the identification of additional growth capacity in the urban area and greater confidence about the number of dwellings that can be delivered in the garden village within the plan period (to 2035) mean that the distribution of growth has changed. The following table shows on the left the distribution of residential growth consulted on in 2017 and on the right the distribution within the Local Plan 2035 Plan for Submission.

2017 consultation paper	Amount of residential development	Local Plan 2035 Plan for submission	Amount of residential development
Urban area	<b>877</b>	Urban area	<b>2,420</b>
Edge of urban area	<b>1,111</b>	Edge of urban area	<b>210</b>
Brownfield site Stewartby Brickworks	<b>1,000</b>	Brownfield site Stewartby Brickworks	<b>1,000</b>
New settlement(s)	<b>2,200</b>	Colworth garden village	<b>2,500</b>
Group 1 villages – Key Service Centres		Group 1 villages – Key Service Centres	
- Bromham	500	- Bromham	500
- Clapham	500	- Clapham	500
- Gt Barford	500	- Gt Barford	500
- Sharnbrook	600	- Sharnbrook	0
- Shortstown	0	- Shortstown	0
- Wilstead	500	- Wilstead	0
- Wixams	0	- Wixams	0
- Wootton	0	- Wootton	0
<b>Total Group 1 villages</b>	<b>2,600</b>	<b>Total Group 1 villages</b>	<b>1,500</b>
Group 2 Villages – Rural Service Centres		Group 2 Villages – Rural Service Centres	
- Carlton	25-50	- Carlton	25-50
- Harrold	25-50	- Harrold	25-50
- Milton Ernest	25-50	- Milton Ernest	25-50

- Oakley	25-50	- Oakley	25-50
- Roxton	25-50	- Roxton	25-50
- Stewartby	0	- Stewartby	0
- Turvey	25-50	- Turvey	25-50
- Willington	0	- Willington	0
Total Group 2 villages (mid point)	<b>225</b>	Total Group 2 villages (mid point)	<b>225</b>
	<b>8,013</b>		<b>7,855</b>

5.11 The main changes are as follows :

- Urban area: greater capacity demonstrated through the One Public Estate programme.
- Removal of large scale allocations on the edge of the urban area at Salph End, Renhold and Gibraltar Corner responding to concerns about coalescence between Bedford and nearby villages.
- Colworth Garden Village: greater capacity considered deliverable in the plan period.
- Removal of the allocation in Sharnbrook village given the nearby Colworth Garden Village proposal.
- Removal of the allocation at Wilstead reflecting the fact that significant growth remains to be delivered at nearby Wixams new settlement.

5.12 Based on an objectively assessed housing need of 19,000 dwellings, and with completions 15/16 and 16/17 and current commitments (including a windfall allowance) totalling 11,183 dwellings, the sites proposed for allocation in the Local Plan 2035 'Plan for Submission' are sufficient to deliver the remaining requirement for allocation of 7,817 dwellings.

### 3. An overview of the local plan itself and its evidence base

5.13 This part of the report outlines the content of the local plan in more detail.

5.14 Introduction & Spatial Portrait

These sections of the plan give the context within which the plan is prepared. The introduction explains how the Local Plan 2035 plan fits into the statutory development plan and the spatial portrait tells the reader about Bedford Borough, summarising its key characteristics. This first part of the plan also summarises other key plans and strategies that the Local Plan 2035 embraces and works alongside.

5.15 Vision & Objectives

The vision statements set out a broad description of what Bedford Borough will look like once the plan's policies have been implemented. Objectives follow on and focus on what needs to be done to deliver the vision. Comments on an early draft of the vision and objectives have helped to focus the scope and direction of the plan. For example, one of the early criticism was that the vision and objectives were too urban focussed and should better reflect the Borough as a whole. The wording of the objectives has been changed to achieve a better balance.

5.16

Health

At a national scale the obvious link between health and planning has been more explicitly reported in recent years. The Council's Joint Strategic Needs Assessment (JSNA) recognises this link and in the planning section (within the Wider Determinants of Health) contains specific actions for joint working on the Local Plan 2035. The introduction of an over-arching section on health in the Plan is part of the response to the JSNA. Specific policies also require development proposals above a certain size to be accompanied by a Health Impact Assessment so that it is clear how health has been taken into consideration when preparing a scheme and what the health impacts will be. Where adverse impacts are identified, mitigation will be sought.

5.17

Strategy and site allocations

This strategy Chapter of the plan explains in detail where and how much development is proposed to deliver the Borough's housing, employment and infrastructure needs. As explained above, the broad approach to the strategy has not changed following consideration of recent consultation responses.

5.18

The focus for growth remains the urban area of Bedford and Kempston with brownfield sites forming a significant percentage (around 80%) of urban growth.

5.19

Allocation sites in and on the edge of the urban area are:

Site name	Use	Residential capacity
St Paul's Square, Bedford (Old bank building site and Shire Hall)	Town centre uses	
Land at Duckmill Lane/Bedesman Lane, Bedford	Residential	20
The station area, Ashburnham Road, Bedford	Residential, offices and retail	100

Greyfriars, Bedford	Residential and retail	200
Land at Ford End Road, Bedford –	Residential, local retail, education and open space	600
Land at Borough Hall, Bedford	Residential and car park	100
Land south of the river, Bedford	Residential, retail, business and community uses	900
Land rear of 268-308 Ampthill Road, Bedford	Residential	35
Land to the north of Beverley Crescent, Bedford	Residential	175
Land at Gold Lane, Biddenham	Residential	160
Land at 329 Bedford Road, Kempston	Residential	5
Land at Mowbray Road, Bedford	Residential	124
Land at Lodge Hill, Bedford	Residential	84
Land to the rear of Bromham Road, Biddenham .	Residential	27
Land at Grazehill, Bedford	Residential	100

5.20 The table gives an indication of site capacity though these numbers do not appear in the local plan itself because until further master-planning and design work is carried out it is difficult to determine the final capacity of a site. Experience shows that being precise about site capacities in local plan allocation policies can slow down the planning process. Indicative capacities will however be given in the delivery trajectory that supports the local plan. This is the work that demonstrates to the local plan inspector that the 19,000 dwellings that make up the Borough's objectively assessed housing need can be delivered.

5.21 The strategy Chapter explains how development in the rural area can support the delivery of the required growth. It has been clear from consultation responses that there is support for a more flexible policy approach that accommodates an appropriate scale of growth in smaller settlements, especially where there is community support. Ideally neighbourhood plans would be prepared to bring forward development sites but where this is not practical or possible, the proposed policies seek to establish a framework for securing appropriate development.

- 5.22 Within Settlement Policy Areas development or re-development will be acceptable in principle. 'Small settlements' are then defined. These are settlements without a Settlement Policy Area that comprise a distinct group of buildings of 30 or more dwellings. Settlements meeting the definition are listed in Chapter 6 of the plan. Within the built form of Small Settlements, development is supported where it contributes positively to the local character and is appropriate to the structure, form and size of the settlement as a whole. This will be a judgement on a case by case basis.
- 5.23 Outside Settlement Policy Areas and the built form of Small Settlements (i.e. in the countryside) development is permitted in very specific circumstances such as the re-use of rural buildings, replacement dwellings, affordable housing to meet local needs and accommodation for rural workers. Exceptionally development proposals will also be supported where there is an identified community need and there is community support. The development must also comply with other criteria to do with location, scale and impact. Again careful consideration will need to be given to any proposals brought forward under this policy on a case by case basis.
- 5.24 Former Stewartby Brickworks  
This is a 55ha brownfield site which has the capacity to deliver a significant amount of growth. As is often the way where land has been previously developed, this is a complex site and issues associated with ground heave as the land around the kilns rehydrates mean that the delivery of development is likely to take place later in the plan period. A contribution of 1,000 dwellings is identified from this site. The 2017 consultation response showed significant support for the reuse of this land for housing growth.
- 5.25 Colworth Garden Village  
During the preparation of the local plan, four new settlement proposals have been assessed. Colworth garden village is allocated in the Plan for Submission and the reasons for this are explained in the supporting document 'Garden Village Topic Paper'. The site extends to 530ha and encompasses the Colworth Science Park and land at Santa Pod Raceway.
- 5.26 The allocation is based on garden village principles. More detail about what this means is given in Chapter 7 of the Plan. 4,500 dwellings are proposed along with 7.5ha of additional employment land. Fundamental to this proposal is the delivery of a new parkway rail station. This will not only allow residents to travel to Bedford and beyond by train but will also provide the opportunity for car drivers currently heading south on the A6 towards Bedford to stop their journey at Colworth parkway. Network rail have been involved in discussions about the parkway element of this scheme and are supportive of the principle. The parkway could help to address an existing issue that Network Rail currently with holding capacity at the rail station in Bedford.
- 5.27 The 2017 local plan consultation invited comments on the four new settlement proposals. In respect of Colworth garden village, residents were concerned about the fact that the proposed primary access to the new settlement from the A6 would be along Souldrop Rd and

- Sharnbrook Rd and would pass very close to Souldrop village. The primary access has been changed and a new road adjacent to Forty Foot Lane will now provide the primary access to the village and parkway station.
- 5.28 This road will also form the vehicular access to the Colworth Science Park complex; the current entry point will be closed to vehicular traffic. This means that traffic currently passing through Sharnbrook to reach Colworth Science Park will be diverted away from the village, thus helping to alleviate current congestion issues in the village in the morning peak.
- 5.29 The policy requires the parkway station to be delivered prior to the first occupation so that those living in the new garden village develop sustainable patterns of travel from day one.
- 5.30 Land at Santa Pod Raceway is included in the allocation so that development of the garden village can be linked to the delivery of noise mitigation measures at the raceway site. As well as physical measures, mitigation will include a scaling back of events at the Santa Pod site, especially drifting events which create the most disturbance to residents.
- 5.31 Detail beyond that provided in local plan Policies 26 and 27 will be prepared in the form of a supplementary planning document. This will be swiftly progressed once the plan is adopted and will enable local residents and local councils to be involved in taking the development forward.
- Group 1 Villages
- 5.32 The development strategy identifies a need for allocations to be made in three Group 1 villages: Bromham, Clapham and Great Barford. These three villages are preparing neighbourhood plans and have notified the Council that they will select and allocate development sites to meet the level of growth in the Local Plan 2035's strategy. Policy 3S explains that in order to ensure delivery of the required amount of growth, neighbourhood plans should have been submitted to the Council by December 2019 or twelve months after the adoption of the Local plan 2035, whichever is the later.
- Group 2 Villages
- 5.33 The development strategy also identifies a need for allocation to be made in six Group Two villages Carlton, Harrod, Milton Ernest, Oakley, Roxton and Turvey. Again, five of the six villages are preparing neighbourhood plans and have notified the Council that they will make allocations in their neighbourhood plans. Roxton is preparing a neighbourhood plan but will not allocate development sites so the Local Plan 2035 makes an allocation for one site to meet the scale of growth identified in the Local Plan 2035 strategy.
- Opportunity sites
- 5.34 The Local Plan 2035 recognises that some sites that are not allocated for technical or land ownership reasons may in time prove to be suitable for development. Where these are in the urban area a planning application may be the most appropriate way forward once issues

have been resolved. Alternatively the sites could be put forward when the Local Plan 2035 is rolled forward. This option is also available for other sites that have not been selected for allocation in this plan. Given the recent report of the National Infrastructure Commission and the Government's support for the growth it proposes, future plans are likely to require the identification of additional land for housing and employment. The Council is likely to be looking for sites of a local and strategic scale.

- 5.35 Development Management Policies  
The next Chapter of the plan contain policies to assist the determination of planning applications. These are generally known as development management policies.

- 5.36 Place Making  
This Chapter of the plan contains policies to ensure that new development respects local distinctiveness and delivers good quality places to live. It contains policies about design, and green infrastructure (which includes landscape, the historic environment and biodiversity). It also contains the Council's policy for Local Green Space which is a new national designation to give greater protection to green spaces that are demonstrably special to local communities. Neighbourhood Plan groups have the opportunity to select Local Green Spaces for themselves and many have chosen to do that. The Local Plan 2035 proposes Local Green Spaces where proposals meeting the tests of the policy have been put forward but Neighbourhood Plans will not make allocations.

- 5.37 Resources and Climate Change  
Policies in this part of the plan consider non-renewable resources and planning policies to address the effects of climate change. It contains policies addressing the Council's approach to the use of previously developed land, agricultural land, pollution, contamination, minerals and waste, energy efficiency, renewable energy and climate change.

- 5.38 Housing  
This part of the plan contains housing policies to assist the determination of planning applications. It summarises the findings of the Council's Strategic Housing Market Assessment and explains the proportion of housing development that needs to be affordable (30%) and that within that proportion, the percentage that needs to be affordable rent (78%). For most types of site this is achievable in financial terms but where it isn't, variations must be justified through the submission of a viability assessment. Policies to guide the housing mix and need for types of specialist housing are included along with the Council's approach to meeting the demand for self and custom build housing.

- 5.38 Policies to guide the replacement and extension of dwellings in the countryside, affordable housing to meet local needs in the rural area, accommodation for rural workers and the re-use of rural buildings are also found in this Chapter though the last of these policies is also relevant for employment uses and for that reason is cross referenced later in the plan.

5.39 A Gypsy and Traveller Accommodation Assessment has been prepared which identifies a need for 2 additional Traveller pitches and 5 additional plots for travelling show people. Provision for the Gypsy and Traveller pitches requirement can be accommodated on the existing site at Kempston Hardwick and a site at Manton Lane is already allocated to make provision for the travelling show people plots. Policies are included against which proposals for speculative applications will be considered.

#### Economy

5.40 As well as giving an overview of the local economy, this Chapter of the plan explains the findings of the Economy and Employment Land Study with regards to the need for additional employment allocations. The amount of additional employment land required to deliver the number of additional jobs needed to balance housing growth is already available as a result of allocations in earlier plans and planning permissions that have been recently granted. However, the plan needs to be flexible enough to deal with what are often termed 'footloose' employment opportunities; these are investment opportunities that do not need to be tied to a particular geographic location but simply need good connectivity to infrastructure. A policy is included in the plan to explain how applications for this kind of use will be considered.

5.41 Existing employment sites have been assessed to enable those of the highest quality to be afforded the greatest protection. Over recent years the Council's approach to the protection of employment land has been challenged on the basis that it is too strict and out of step with the National Planning Policy Framework. It is still appropriate to retain good quality, viable employment sites for employment uses but the approach taken in the Local Plan 2035 recognises that some of the Borough's older and more dated sites could be better used for other uses. Some have a positive allocation for redevelopment for residential use, others will provide the opportunity for redevelopment for other non 'B' class uses use through the development management process.

5.42 The emerging Bedford Growth Plan recognises the importance of initiatives to improve local employment and self-employment prospects. A highly skilled and employable workforce, with access to training and work opportunities, is essential to support our growth agenda by helping to attract inward investment and enabling local businesses to grow. Employment and Skills Plans will be required as part of development proposals over 200 dwellings or 5ha of employment land. The Council is preparing guidance to help developers scope and prepare Employment and Skills Plans.

5.43 Policies are included against which employment development in the countryside will be assessed and a development management policy to support the visitor economy explains how such proposals will be considered.

5.44 The remainder of the economy Chapter of the plan deals with the retail aspects of Bedford town centre and other centres in the retail hierarchy. It includes policies to guide retail development in line with the requirements of national policy. In doing so, it recognises that recent years have seen challenges to the role of town centres. These include:

- The rise in internet shopping, including 'click and collect' shopping.

6(14)

- The trend for non-food chain retailers to concentrate on larger retail centres – in the Bedford context this includes Milton Keynes, Cambridge and Rushden Lakes.
  - The continued demand by retailers for out of centre locations, increasingly not just bulky goods and DIY retailers.
  - The increasing demand for cafes, bars and restaurants in town centres as leisure expenditure rises and shopping is seen as a leisure activity.
- 5.45 These challenges will continue to grow over the Plan period and, in order for Bedford to perform strongly, it will need to adapt to and embrace these challenges. Nevertheless, there remains a role for store-based shopping and for town centres. Growth will bring with it a capacity to support additional retailing and the scale of this is identified. Detailed policies explain how applications for retail and other town centre development will be assessed at different locations.
- Plan Implementation and Infrastructure Delivery
- 5.46 This is a substantial part of the plan that addresses the provision of infrastructure alongside growth. It explains the mechanisms that can be used to secure the principle and delivery of infrastructure.
- 5.47 The infrastructure that is needed is identified in an Infrastructure Delivery Plan. This Plan does not seek to identify every last item of infrastructure but it lists the main elements that are needed to support the success of the local plan.
- 5.48 The use of S106 agreements and the Community Infrastructure Levy to secure infrastructure delivery are explained.
- 5.49 Viability is an increasingly important consideration in the preparation of local plans as schemes that are not viable at allocation are unlikely to be delivered in the form envisaged in the policy. It is therefore important that the plan as a whole and its strategic policies are shown to be viable at the plan making stage. The Council has carried out its viability testing through specialist independent consultants. It remains the case however that market conditions are likely to change over the lifetime of the plan and without scope for some flexibility the delivery of the plan may stall. In recognition of this, applicants seeking development permissions which do not achieve full policy compliance will need to be supported by a viability appraisal from the outset. This will be independently assessed at the applicant's cost.
- 5.50 The remainder of this Chapter of the local plan addresses specific types of infrastructure including transport, active travel and accessibility, public transport, sustainability and environmental protection, new transport infrastructure, access to the countryside, flood risk and sustainable drainage, broadband, utilities and sports and leisure provision.

5.51 Monitoring  
Monitoring the success of the Local Plan 2035's policies will be an ongoing process. It will happen through the publication of monitoring reports that will be published on the Council's web site. If monitoring indicates that targets are not being met or policies are not performing in the way envisaged then reasons for poor performance will be explored and action taken. This may involve the review of policies when the local plan is rolled forward beyond 2035.

5.52 Evidence base  
The Local Plan 2035 is supported by a comprehensive evidence base. This has evolved over the period that the plan has been prepared and supports the level of growth accommodated in the Plan for Submission. Evidence base documents are listed at Appendix B. The titles are hyperlinked. The evidence base must be submitted for examination alongside the Plan and will be tested through the examination process.

#### **4. Forthcoming consultation (Regulation 19) and next steps**

5.53 Formal publication of the 'Plan for submission', also known as Regulation 19 consultation, invites local residents and others with an interest to support, object to or comment on the plan. At this stage representations must be made on a standard form and must be received by the published deadline. Questions are asked about the plan's soundness and legal compliance. Those objecting on the basis that the plan isn't sound are asked to say how the plan should be changed to make it sound.

5.54 Regulations require that the consultation period must be at least six weeks (22 January 2018 to 5 March 2018). The contacts on the Local Plan 2035 consultation list will be directly notified and information will be made available to enable local councils to publicise the consultation in their local area. A statutory notice must appear in the local paper. The 'Plan for Submission' and the supporting technical documents will be made available on the Council's web site and in hard copy in the Borough's libraries and at the Customer Services Centre. Documents will also be placed in libraries close to but outside the Borough.

5.56 Following the close of the consultation Officers will prepare a summary of the main issues that have been raised. These will be reported to a meeting of the Executive on 28<sup>th</sup> March 2018 along with any proposed minor amendments to the plan. If major changes need to be made (such as a change to the level of growth or the addition of a development site) then the Regulation 19 consultation would need to be repeated so that the Examination Inspector is aware of any issues raised by consultees.

5.57 If the Executive is satisfied that having considered the main issues raised during the consultation, the plan should be submitted for formal examination then it will be invited to recommend this course of action to a meeting of Full Council scheduled to take place later the same

day. If Full Council approval is given, the Local Plan 2035 and supporting documents will be submitted for formal examination shortly afterwards.

5.58 The timetable described above reflects the recently updated Local Development Scheme. A decision by Full Council on 28<sup>th</sup> March 2018 to submit the plan for formal examination will enable the plan and supporting documents to be delivered to the Planning Inspectorate before the end of March 2018. As explained in para 4(d) above, this will enable the plan to progress on the basis of current housing need (19,000 dwellings 2015-2035) rather than the higher dwelling requirement likely to result from the Government's proposed standard methodology. The plan will not be delayed whilst the evidence base is updated to support a higher number.

5.59 The examination of the plan commences on the day that the plan is received by the Planning Inspectorate. Given the number of local authorities amending their plan timetables in order to meet the end of March 2018 deadline, there may be a longer than usual delay before the hearing sessions commence.

5.60 The Council must appoint a Programme Officer to manage the examination process. Those people who have objected to the plan have a right to request an appearance at the hearing sessions though the Inspector will decide who will be invited to take part. In liaison with the Inspector the Programme Officer will prepare a schedule of public hearing sessions so that the main issues can be debated. Once the hearing sessions have finished, the Inspector will prepare a report and will ask for any main modifications to be advertised.

5.61 Following consideration of any consultation responses on the modifications the Inspector will prepare his/her final report to the Council. With the updated timetable now in place it is hoped that, if found to be sound, the plan can be adopted at the end of 2018 or early 2019. The timetable will depend on the availability of an Inspector, the number and range of objections received and the number of hearing sessions required.

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

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

Management Team  
Finance  
Legal

Teams across the Council and external partners have been involved in preparing the Local Plan 2035.

**7. Ward Councillor Views**

Not applicable for this report.

Report Contact Officer:

Gill Cowie  
Manager Planning and Housing Strategy  
(01234) 718567  
Gill.cowie@bedford.gov.uk

File Reference:

Local Plan 2035

Previous Relevant Minutes:

Background Papers:

Appendices:

Appendix A – 2017 consultation comments with Officer responses  
Summary of Consultation Results  
Appendix B – Local Plan 2035 Plan for Submission  
Appendix C – Documents Supporting the Local Plan 2035

Appendix A [2017 consultation comments with Officer responses Summary of Consultation Results](#)

Appendix B Local Plan 2035: Plan for submission

Appendix C Documents Supporting the Local Plan 2035

<b>Documents Supporting the Local Plan 2035</b>	
01	<a href="#">Strategic Housing Market Assessment</a>
02	<a href="#">Economy and Employment Land Study</a>
03	<a href="#">Economy and Employment Topic Paper</a>
04	<a href="#">Development Strategy and Site Selection Methodology</a>
05	<a href="#">Settlement Hierarchy</a>
06	<a href="#">IPE report</a>
07	<a href="#">Bedford Town Centre Topic Paper</a>
08	<a href="#">Commercial Leisure Needs Study</a>
09	<a href="#">Bedford Retail Study Volume 1</a> <a href="#">Volume 2</a> <a href="#">Volume 3</a>
10	<a href="#">Bedford Retail Study Update</a>
11	<a href="#">Shopping policies Topic Paper</a>
12	<a href="#">Gypsy and Traveller Accommodation Assessment</a>
13	<a href="#">Traveller Site Position Statement</a>
14	<a href="#">Renewable Energy Resources Topic Paper</a>
15	<a href="#">Energy Efficiency Background Paper</a>
16	<a href="#">Water Resources Background Paper</a>
17	<a href="#">Bedford Borough Hotel Futures Update</a>
18	<a href="#">Bedford Visitor Accommodation Review</a>
19	<a href="#">Sustainability Appraisal Scoping Report 2013</a>
20	<a href="#">Sustainability Appraisal – Issues and Options Paper Report 2014</a>
21	<a href="#">Sustainability Appraisal – Addendum to Issues and Options 2015</a>
22	<a href="#">Sustainability Appraisal – Second Addendum to Issues and Options 2017</a>

23a	<a href="#">Sustainability Appraisal Report</a>
23b	<a href="#">Sustainability Appraisal Report Appendices</a>
23c	<a href="#">Sustainability Appraisal Report non-technical summary</a>
24	<a href="#">Sustainability Appraisal of Sites</a>
25	<a href="#">Local Plan viability assessment including viability typologies</a>
26	<a href="#">Garden Village Topic Paper</a>
27	<a href="#">New Settlements site appraisal summary</a>
28	<a href="#">Systa Sharnbrook Railway Initial Comments</a>
29	<a href="#">A6 Development Options Assessment</a>
30	<a href="#">Cumulative modelling of plan strategy</a>
31	<a href="#">Site Assessments and Potential Options for Allocation – (urban, edge of urban, group 1 and group 2 villages)</a>
32	<a href="#">Housing sites trajectory</a>
33	<a href="#">SHELAA</a>
34	<a href="#">OPE Bedford Masterplan Consultation Report November 2017</a>
35	<a href="#">Local Green Spaces Methodology</a>
36	<a href="#">Local Green Spaces Site Assessments</a>
37	<a href="#">Landscape Character Assessment</a>
38	<a href="#">Landscape Sensitivity Study – Group 1 and Group 2 Villages, Bedford and Kempston Urban Edge</a>
39	<a href="#">Education Implications for Local Plan 2035</a>
40	<a href="#">Infrastructure Plan</a>
41	<a href="#">Officer comments to 2017 consultation responses</a>
42	<a href="#">Changes to the Policies Map arising from the plan's policies.</a>
43	<a href="#">URRS Strategic Flood Risk Assessment level 1 2015</a>
44	<a href="#">Summary of consultation results 2017</a>