

Bedford Borough Council Town Centre Area Action Plan – Inspector’s Report

Annex A

Table of Recommended Changes

Ref. No.	TCAAP policy or paragraph	Report paragraph	Recommended change
Pre-Examination Changes (Advertised)			
PEC25	Bullets between Policies TC2 and TC3	3.21-28	See IC1 below
PEC26	Bullets between Policies TC2 and TC3	3.21-28	See IC1 below
PEC27	Table 2	3.64	See MC15 below
PEC28	Paragraph C.2	3.21-28	See IC3 below
PEC29	Paragraph C.3	3.72	Insert the following text at the end of paragraph C3 – A Better Connected and More Accessible Centre: ‘The Council will monitor rates of infrastructure delivery and traffic levels within the Plan Area. Where additional network capacity is unlikely to be delivered within the plan period, the strategy of this plan will need to be reviewed. Any such review will also take into account any subsequent review of the East of England Plan (RSS14).’
PEC30	Appendix C Table 5a	3.86-88	See PC47 below
PEC31-36	Appendix D Table 6	3.86-88	See PC48 below
Additional Changes Proposed by the Council During the Hearing Sessions (Not Advertised)			
Terminology changes			
PC1	Page 3 and page 11 - inset box - line 1	3.9-12	Delete ‘Bedford town centre’. Replace by ‘central Bedford’.
PC2	Page 4 bullet 3 of ‘Key proposals include:’	3.9-12	Delete ‘within the town centre’.
PC3	Paragraph 1.13 line 4	3.9-12	Delete ‘town centre’. Replace by ‘Town Centre Area Action Plan’.
PC4	Paragraph 1.14	3.9-12	Delete sentences 1 and 2. Replace by: ‘This document explains how the council thinks the town centre and the remainder of the Plan Area should change in the

			period between now and 2021. It sets out the council's vision for the town centre and the remainder of the Plan area and turns this into a series of linked objectives and policies.'
PC5	Paragraph 3.3 lines 2 and 3	3.9-12	Delete 'in the town centre'.
PC6	Page 14 'Strategic Policy' line 1	3.9-12	Insert 'and remainder of the Plan Area' after 'centre'.
PC7	Paragraph 3.5 line 1	3.9-12	Delete 'Within Bedford town centre,'. Replace 'this' by 'This'.
PC8	Paragraph 4.18 line 2	3.9-12	Delete 'in the town centre'.
PC9	Paragraph 4.25 line 4	3.9-12	Delete 'town centre'. Replace by 'Plan Area'.
PC10	Paragraph 5.1	3.9-12	Delete 'within the town centre' in line 3. Replace 'for the town centre' by 'of the Town Centre Area Action Plan' in line 4.
PC11	Paragraph 5.3	3.9-12	Delete 'within the town centre' in line 1. Delete 'in the town centre and' from bullet 5.
PC12	Paragraph 5.4 line 1	3.9-12	Insert 'and around' after 'in'.
PC13	Paragraph 5.11 line 4	3.9-12	Delete 'through the town centre'.
PC14	Paragraph 6.15 line 3	3.9-12	Delete 'town centre'. Replace by 'Plan Area'.
PC15	Policy TC1	3.9-12	Insert 'A number of general policies apply to those parts of the Plan Area which lie outside the designated Town Centre (see paragraph 7.1).'
PC16	Paragraph 6.20 line 4	3.9-12	Delete 'of the town centre'.
PC17	Policy TC15 iv)	3.9-12	Delete 'town centre'. Replace by 'townscape'.
PC18	Paragraph 6.24	3.9-12	Delete 'within the town centre' from line 3 and 'for the town centre' from line 4.
PC19	Text following Policy TC22 line 1	3.9-12	Delete 'in the town centre'.
PC20	Paragraph 6.31 line 1	3.9-12	Delete 'Town centre'. Replace 'development' by 'Development'.
PC21	Policy TC25	3.9-12	Delete 'town centre'. Replace by 'Plan Area'.
PC22	Policy TC26	3.9-12	Delete 'town centre'. Replace by 'Plan Area'.
PC23	Policy TC27	3.9-12	Replace 'the' by 'existing' in line 1 and delete 'of Bedford town centre' from line 2.
PC24	Policy TC31	3.9-12	Delete 'in the town centre'.
PC25	Page 51 3 rd bullet of 'Shop Fronts and Advertisements'.	3.9-12	Delete 'town centre'. Replace by 'Plan Area'.
PC26	Policy TC33	3.9-12	Delete 'within the town centre' from lines 1 and 6.
PC27	Policy TC35	3.9-12	Delete 'Within the town centre' from line 1. Replace 'where' by 'Where'.
PC28	Paragraph 7.1	3.9-12	Delete 'town centre'. Replace by 'Plan Area'.
PC29	Policy TC39	3.9-12	Delete 'town centre'. Replace by 'Plan Area'.

PC30	Paragraph 7.3 line 1	3.9-12	Delete 'within the town centre'. Insert 'the' after 'impact of'.
PC31	Paragraph E.1 line 1	3.9-12	Delete 'within the town centre'.
PC32	Paragraph E.3	3.9-12	Delete 'to the town centre'.
PC33	Paragraph E.12 line 1	3.9-12	Delete 'within the town centre'.
PC34	Paragraph E.18 lines 1 and 4	3.9-12	Delete 'for the town centre'.
PC35	Paragraph E.25 line 3	3.9-12	Delete 'within the town centre'.
PC36	Paragraph E.26 line 1	3.9-12	Delete 'within the town centre'.
PC37	Paragraph E.29 line 1	3.9-12	Delete 'Within the remaining parts of the town centre'. Replace by 'Elsewhere'.
PC38	Paragraph F.1 line 1	3.9-12	Insert 'and remainder of the Plan Area' after 'town centre'.
PC39	Paragraph F.2 line 1	3.9-12	Delete 'within the town centre'.
PC40	Appendix G Table 8 Existing Parking Provision	3.9-12	Delete '(Provision within the Town Centre)' from column 1 row 10 (see also MC17)
PC41	Appendix G Table 8 Future Parking Provision	3.9-12	Delete '(Provision within the Town Centre)' from column 1 row 8 (see also MC17)
PC42	Paragraph H.1 lines 1 and 2	3.9-12	Delete 'of the town centre'.
PC43	Appendix I	3.9-12	Insert 'Plan Area: the area encompassed by the Area Action Plan boundary.' After the definition of 'Permeability'.
Other changes			
PC44	Policy TC7 vii)	3.67-69	Insert '(see Policy TC20)' after 'improvements'.
PC45	Policies TC18-20 and paragraphs 6.26-28	3.67-69	<p>Delete paragraphs 6.26-28 and Policies TC18-20 and replace by: 'The area action plan pursues a strategy that seeks to satisfy a number of objectives: -</p> <p>(i) Mitigation of traffic impacts</p> <p>Notwithstanding the effects of encouraging more sustainable travel demand management and diverting unnecessary movement away from the town centre, there will inevitably be increases in traffic flow at certain times of the day and in certain locations. These effects can be mitigated by network improvements. The Borough Council, County Council and Renaissance Bedford have instructed consultants to carry out a further transportation study in order to refine the transport strategy set out in the Bedford Town Centre Development Framework Study and to provide a more detailed assessment of what is needed and when. Policies TC18, 19 and 20 set out the current position.</p>
Policy TC 18 - Junction/Network Improvements 2006-2011			

			<p>The following proposals will be pursued through the Local Transport Plan and other means (including developer contributions where they are required to facilitate the development of specific sites):-</p> <p>Developer Funded Schemes</p> <ul style="list-style-type: none"> • Realignment of Greyfriars • Midland Road/ Greyfriars junction • River Street/ Greyfriars junction • Improvements to Hassett Street/Beckett Street/Gwyn Street, Brace Street and Bromham Road • Priory Street to be one-way northbound • Greenhill Street - closure <p>LTP/Other Funded Schemes</p> <ul style="list-style-type: none"> • Town Centre Traffic Management & Control System. • Ford End Road/Prebend Street junction • Right turn into the Embankment 	
<p>The Bedford Town Centre Development Framework Study Transportation Strategy identified that post 2011, there was a need to increase river crossing capacity and proposed the Batts Ford bridge. A subsequent transportation study has shown that the new river crossing is necessary in conjunction with the completion of the Western Bypass to enable the detrafficking of the High Street. In addition, when combined with other measures, the bridge has potential to incorporate bus priority links, reduce congestion and to improve accessibility to the town centre for non car modes.</p> <p>Further studies will be commissioned to look at the detailed design and feasibility of the new river crossing. This will determine the function of this new link in the network and its role in terms of providing public transport priority rather than providing roadspace for general traffic. Its role in facilitating access by park and ride services to the new bus station will also be assessed.</p>				
<p>Policy TC 19 - Network Improvements post 2011</p> <p>Successful regeneration activity will require a new river crossing at Batts Ford linking Kingsway to River Street with or without other network improvements including the safeguarded Prebend Street relief road as shown on the Proposals Map. In order to achieve this strategy, a corridor (as shown on the Proposals Map) will be safeguarded to accommodate a new river crossing and approach roads linking River Street and Kingsway. This scheme will be pursued as an integral part of a major bid through the Local Transport Plan process and would also be likely to require: -</p> <ul style="list-style-type: none"> • improvements to the Kingsway/Cauldwell Street junction and the River Street/Horne Lane junction; • reversion of Horne Lane, River Street and Kingsway to two-way operation; • introduction of an access restriction point at the junction of Horne Lane and St Paul's Square (for eastbound traffic); • bus priority measures where feasible. 				
<p>The details of the improvement measures will subsequently need to be worked up as individual planning applications come forward (see also Policy TC41). This is a development control matter that will be managed through the preparation of transport assessments and the negotiation of Section 106 Agreements. Achieving suitable access to the development sites by all modes of transport is a material consideration.</p>				

			<p>Policy TC 20 - Development Related Network Improvements At this stage it would appear that the Bedford Town Centre West redevelopment will require developer funded improvements as follows:-</p> <ul style="list-style-type: none"> • Realignment of Greyfriars • Midland Road/ Greyfriars junction • River Street/ Greyfriars junction • Improvements to Hassett Street/Beckett Street/Gwyn Street, Greenhill Street, Brace Street and Bromham Road • Priory Street to be one-way northbound <p>Developer funded network improvements may also be required in association with the development of other town centre sites.</p>
			In addition improvements to the Ashburnham Road/Bromham Road junction are to be undertaken in association with the development of Land North of Bromham Road (Local Plan Policy H8).'
PC46	Appendix C Table 5	3.86-88	Delete Table 5. Replace by up-dated Table 5 (see Annex B)
PC47	Appendix C	3.86-88	Insert up-dated version of Table 5a after Table 5 (see Annex B)
PC48	Appendix D Table 6	3.86-88	Delete Table 6. Replace by revised Table 6 (see Annex C)
Changes Recommended by the Inspector			
IC1	2 nd bullet between Policies TC2 and TC3	3.21-28	Delete 2 nd bullet between Policies TC2 and TC3. Replace by:- <p>'The Town Centre Area Action Plan makes provision for a total of 31,200 sq.m. of new retail floorspace on the Bedford Town Centre West, Riverside Square and Castle Lane sites. The Council acknowledges that the Plan does not make allocations for retail development which, on their own, would be sufficient to meet the maximum requirements set out in Policy TC2. However, the allocations which have been made should be seen as the first phase of an on-going process. In this first phase the Council's strategy is to focus efforts on the delivery of these 3 main sites. Given the lack of significant retail investment in the town centre in the last 30+ years it is imperative that the current window of opportunity is not lost. The development of the 3 main sites will significantly enhance Bedford's attractiveness for further development.</p> <p>To take the Plan's town centre regeneration effort forward to 2016 and possibly beyond, the Council will undertake a thorough review of its strategy for the provision of retail floorspace before the end of 2011 in the light of, amongst other things:</p> <ul style="list-style-type: none"> • progress on the retail allocations contained in the TCAAP; • predictions of additional retail floorspace requirements made in the light of growth in the retail catchment area; and, • the potential for the existing, or an expanded, PSA to deliver any additional requirements for retail floorspace. <p>As part of the review, the Council will identify sites and opportunities to meet any predicted requirements. Initially, the</p>

			focus for the search for additional sites and opportunities is likely to be on the existing PSA and the land to the north but, depending on circumstances, it may be that other sites and opportunities for development within the plan area will also be included.'
IC2	Policy TC41	3.29	Delete criterion 4 and replace by: '4. Except in the case of extensions to existing premises involving 200 m2 or less of additional floorspace, where retail uses are proposed on sites not allocated for retail purposes which lie outside the Primary Shopping Area but within the Plan Area, an assessment of need and a sequential test of the proposed location will be required in line with the advice contained in PPS6.'
IC3	Paragraph C.2	3.21-28	Delete text after 'A MORE COMPETITIVE AND COMMERCIALY ACTIVE CENTRE'. Replace by: - 'The Strategic Policy and Policies TC1-TC6 are general policies which will be implemented through the development control process as and when proposals arise. The effectiveness of these policies will depend upon the scale of development activity and will be assessed through monitoring. The retail floorspace provision target set out in Policy TC2 has not been fully allocated in the plan. The plan concentrates on the delivery of three key sites expected to deliver 31,200 m2 of retail floorspace. If monitoring indicates that the amount of additional retail floorspace allocated on the three sites is not likely to be delivered in line with predictions and, in any event, before the end of 2011, the Council will undertake a thorough review of its strategy for the provision of retail floorspace to consider the reasons behind any failure of provision, any need for additional floorspace and the extent of the Primary Shopping Area in order to take the regeneration effort forward to 2016 and possibly beyond.'
Minor Changes Not Affecting Soundness of the DPD			
Terminology changes			
MC1	Page 13 Figure 1	3.8	Amend key by deleting 'core shopping area'. Replace by 'primary shopping area'.
MC2	Page 32 paragraph 6.10 (i)	3.8	Delete 'core retail area'. Replace by 'primary shopping area'.
MC3	Page 34 paragraph 6.16	3.8	Delete 'town centre core'. Replace by 'primary shopping area'.
MC4	Page 35 1 st bullet after Policy TC2	3.8	Delete 'core area'. Replace by 'primary shopping area'.
MC5	Page 35 1 st bullet after Policy TC3	3.8	Delete 'main shopping core'. Replace by 'primary shopping frontages'.
MC6	Page 37 1 st bullet after paragraph 6.20	3.8	Delete 'the core'. Replace by 'the area'.
MC7	Page 64 Figure 4	3.8	Delete 3 references to 'shopping core' in the Key. Replace by 3 references to 'primary shopping area'.
MC8	Appendix I	3.8	Add 'Retail Core: see primary shopping area' to Glossary.
Other changes			
MC9	Strategic Policy page 14	3.79	Delete 'taxi' in bullet 8 and replace by 'taxis/private hire vehicles'.
MC10	After page 17	3.53	Insert the following text: ' SHIRE HALL AND BANK BUILDING SITE

			<p>This site includes the Shire Hall which was completed by Alfred Waterhouse in 1881, several listed buildings on the south side of St. Paul's Square and the vacant Bank building site which is an important gateway location on the southern approach to the town centre. The listed buildings have been empty for many years and need to be brought back into use in order to secure their future.</p> <p>There is scope to expand the existing operation of the courts in order to create a regional justice centre. This will also help to secure the future of the Shire Hall building.</p> <p>Any scheme will need to be sensitively designed having regard to the heritage issues, the historic fabric and the prominence of the site. It is important that any development fronts on to St. Paul's Square, High Street and the river frontage.'</p>			
MC11	Policy TC7 iv)	3.79	Delete 'taxi' and replace by 'taxis/private hire vehicles'.			
MC12	Policy TC13 iii)	3.79	Delete 'taxi' and replace by 'taxis/private hire vehicles'.			
MC13	Policy TC23	3.78, 3.79	Delete 'and reviewing the pick-up and setting down points around the town centre' from the first bullet under 'Service Improvements'. Delete 'and taxis' from the first bullet under 'Bus Station' and replace by 'and taxis/private hire vehicles'.			
MC14	Policy TC24	3.73-74	<p>Insert the following additional paragraph of text before Policy TC24: 'The basis of this parking strategy is set out in the Bedford Town Centre Development Framework Study. It explains that in developing the parking strategy for Bedford town centre, an attempt has been made to strike the right balance between provision and management (including the charging regime) and the alternatives offered by public transport, walking and cycling.</p> <p>The Framework Study identifies the following elements that together will secure the parking strategy</p> <ul style="list-style-type: none"> • Management of the overall parking stock so that the number of spaces available for public use at times of peak demand is in line with newly identified maximum standards for the town centre that are consistent with or tighter than PPG13 maximum standards; • Recognising the opportunity to control the overall supply of public parking through the redevelopment of existing surface car park sites; • Increased public car parking charges that are complementary to the transport strategy but at the same time sit comfortably with charging levels in nearby (and competing) town centres; • A move towards consistent charging across all town centre car parks that are available for public use, with charges set to deter long stay commuter parking; • Shared parking provision for different land uses in line with PPG13; • Provision of on-plot parking at less than PPG13 maximum standards with flexible management arrangements offering the potential to tighten standards further over time in line with the success of the town centre; • Provision of a replacement multi-storey car park on the bus station site that is designed to the 'Gold Standard' of safety and security; • New park and ride facilities in appropriate locations; • A provision of conveniently located disabled parking spaces within all car parks; • Strict on-street parking controls within the town centre and its hinterland.' 			
MC15	Table 2 before Policy TC25	3.64	Delete Table 2 and replace by: -			
			<table border="1"> <tr> <td>Site</td> <td>Residential Capacity (exclusive of</td> <td>Delivery Period</td> </tr> </table>	Site	Residential Capacity (exclusive of	Delivery Period
Site	Residential Capacity (exclusive of	Delivery Period				

			demolitions)	
			Policy TC7 – New Retail Quarter – Bedford Town Centre West	300 2010/11-2015/16
			Policy TC9 – New Cultural Quarter – Castle Lane	104 2007/8 -2008/9
			Policy TC10 – Cultural Quarter – Cecil Higgins Art Gallery & Bedford Museum	20 2009/10
			Policy TC11 – Riverside Square	155 2008/9-2009/10
			Policy TC13 – Station Quarter – Bedford Station	180 2010/11-2014/15
			Policy TC15 – Kingsway Quarter	300 2008/9, 2012/13-2016/17
			Policy Tc16 – Land at Lime Street	10 2011/12
			Policy TC17 – Progress Ford, The Broadway	85 2008/9-2009/10
			Total capacity	1154
MC16	Policy TC41	3.65	Add additional criterion to read: 'Where residential use is proposed, evidence in relation to air quality to demonstrate that a satisfactory residential environment can be achieved.'	
MC17	Appendix G Table 8	3.76	In Table 8 - Existing Parking Provision insert the following row after row 9 'St Peter's Street' : 'Bedford Station 613'. Delete '3315' from column 2 row 10 and replace by '3928' Delete '3795' from column 2 row 12 and replace by '4408' In Table 8 - Future Parking Provision insert the following row after row 7 'St Peter's Street': 'Bedford Station 900 Provisional figure – to be determined at planning application stage' Delete '3149' from column 2 row 8 and replace by '4049' Delete '4879' from column 2 row 13 and replace by '5779'	
MC18	Policy TC27	4.1	In iv) delete 'property boundaries' and replace by 'historic boundaries, spaces between buildings and the public realm'. Delete final sentence and replace by: 'Development proposals will need to demonstrate how the historical context has been addressed as appropriate. In areas of archaeological potential, archaeological assessment will be required and remains should be preserved in situ. Where this is not justified or feasible excavation, recording and interpretation will be required.'	
MC19	Policy TC36	4.1	Delete part vi) and replace by: 'vi) Whether conservation, heritage, biodiversity and green space issues have been properly addressed;'. Replace '.' At end of part vii) and replace by ';'. After part vii) insert: 'viii) The suitability of the development in terms of crime prevention and community safety.'	
MC20	Policy TC41	4.1	Add additional criterion to read: 'An appraisal to establish existing biodiversity value of the site and to explain how development proposals will affect or enhance it.' In 7 insert 'and other important archaeological remains' after 'monuments'. Replace 'and' by ',' before 'scheduled'.	