



Local Plan 2032

Planning for the future

Issues and Options Paper

Local Plan 2032

'Planning for the future'

Contents		Page
Section 1	Introduction	1
Section 2	Sustainability Appraisal/Strategic Environmental Assessment	8
Section 3	Habitats Regulations Assessment	8
Section 4	Bedford Borough today and challenges for the future	9
Section 5	Looking beyond the Bedford Borough boundary	14
Section 6	What level of growth is needed?	17
Section 7	Planning for travellers	21
Section 8	Where should the growth take place?	21
Section 9	Bedford town centre	28
Section 10	Call for sites	29
Section 11	Role of neighbourhood planning	31
Section 12	Making decisions on planning applications	32
Appendix 1	Issues and Options Paper response form	35
Appendix 2	Local Plan 2032 draft objectives	41
Appendix 3	Call for sites submission form	42
Appendix 4	Glossary	48

Local Plan 2032

'Planning for the future'

1. Introduction – what is this consultation about?

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

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

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

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

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

Consultation dates

1.5 The consultation on the Issues and Options Paper runs from 13 January 2014 to 24 February 2014. Please send your comments as early as you can as this helps us to keep to the timetable.

How to get involved

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

Bedford Borough Council
Consulting Bedford
FREEPOST ANG5840
Bedford
MK40 1ZD

- 1.9 This is a freepost address and no stamp is required. All responses (electronic and paper) must be received by 5 pm on 24th February 2014.
- 1.10 A paper copy of the Issues and Options Paper may also be viewed at the council's Customer Service Centre at 2 Horne Lane, Bedford. MK40 1RA. It is also available in all libraries in the borough as well as Biggleswade, Rushden, Flitwick and St Neots libraries during normal opening hours.
- 1.11 Responses received will be published on the council's web site and attributed to source (this may include your name and a reference number).

The next steps

- 1.12 This consultation marks the first stage in the preparation of the new local plan.
- 1.13 We are starting to write the local plan and we will use the responses to this Issues and Options Paper consultation to help us. There will be an opportunity to comment on a draft plan later this year so that we can gauge reaction to the draft policies and proposals and judge whether the plan is 'sound'. Provided no further changes are necessary, we will then submit the Local Plan 2032 to the Secretary of State for independent examination.
- 1.14 More information on publicity and consultation in the local plan process and guidance on how to make effective comments are contained in the Statement of Community Involvement 2013 (www.bedford.gov.uk/SCI).

How long will it take to write the plan?

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

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

More information can be found in the Local Development Scheme

(http://www.bedford.gov.uk/environment_and_planning/planning_town_and_country/planning_policy_its_purpose/local_development_scheme.aspx)

Why is the Local Plan 2032 being prepared?

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

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

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

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

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

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

How does this affect me?

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

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

Why is 2032 the proposed end date of the plan?

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

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

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

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

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

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

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

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

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

1.30 Over recent years the council has been busy preparing the Bedford Development Framework. This framework is a group of documents that together contain planning policies for the borough. The idea of having more than one document was introduced by the government in 2004; the intention was that each document would be quite brief, quick to prepare and easier to understand than some of the old style local plans (pre 2004)

that often ran into hundreds of pages. Consequently documents prepared as part of the Bedford Development Framework have gradually replaced many but not all policies in the Local Plan 2002.

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

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

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

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

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

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

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

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

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

What information will be available to inform the plan?

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

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

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

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

2. Sustainability Appraisal / Strategic Environmental Assessment

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

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

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

2.3 Following the scoping stage, the next stage involved the appraisal of the plan options set out in this Issues and Options Paper against the sustainability objectives. This has highlighted the social, economic and environmental impacts that are likely to arise from each plan option. The findings will help to develop the most sustainable strategy for future development in the borough and recognise where measures are necessary to mitigate any negative effects that cannot be avoided. The Issues and Options Paper Sustainability Appraisal Report is subject to consultation alongside the Issues and Options Paper and can be found along with the Scoping Report at www.bedford.gov.uk/localplan2032 and at the locations where paper copies of the Issues and options Paper is available.

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

3. Habitats Regulations Assessment

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

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

4. Bedford Borough today and challenges for the future

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

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

Local Plan Theme 1: Housing

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

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

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

Issue 1

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

Local Plan Theme 2: The economy

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

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

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

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

Issue 2a

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

Issue 2b

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

Local Plan Theme 3: Health and well-being

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

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

Issue 3

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

Local Plan Theme 4: Infrastructure

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

Issue 4

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

Local Plan Theme 5: Transport

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

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

Issue 5

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

Local Plan Theme 6: Natural environment

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

Issue 6

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

Local Plan Theme 7: Built environment

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

Issue 7

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

Local Plan Theme 8: Climate change

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

Issue 8a

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

Issue 8b

How to meet local targets for carbon reduction.

Local Plan Theme 9: Viability and deliverability

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

Issue 9a

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

Issue 9b

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

Question 4. Do you agree that 1-9 above are the key themes that the Local Plan 2032 should address?

If not, what do you think should be added to /deleted from the list of themes?

Do you have specific comments on the themes or the objectives in Appendix 2?

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

5. Looking beyond the Bedford Borough boundary

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

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

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

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

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

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

1 Overall scale of new housing provision

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

2 Overall scale of new employment provision

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

3 New development adjacent to the boundaries with other authorities

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

4 Impact on the highway network

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

5 East - West Rail

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

6 Midland Mainline rail electrification

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

7 Travellers

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

8 Green infrastructure

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

9 Town centres

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

10 Infrastructure

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

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

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

6. What level of growth is needed?

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

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

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

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

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

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

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

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

6.8 Because the forecasts that are produced by this work are based on past trends we also need to look at the local factors which may affect future household formation rates. These include the likely level of future in and out-migration (the number of people moving into and out of Bedford Borough) and economic constraints on household formation (for example fewer new households forming due to the difficulty in getting mortgages). At

the same time we have also looked at the likely number of jobs that will be needed, again using trend based information (what happened in the past) and the economic forecasts contained in a model called the East of England Forecasting Model.

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

6.10 The document 'Bedford Borough Demographic Forecasts 2012-2032' has been prepared for Bedford Borough Council by consultants Edge Analytics. It explains the range of possible forecasts and the difference between them (it is available at www.bedford.gov.uk/localplan2032). The consultants recommend that Bedford Borough Council considers its 'starting point' for the objective assessment of housing need within the range of 650-815 dwellings per year over the plan period (2012-2032). For the purpose of this consultation the mid point of this range has been chosen to illustrate possible options for growth at Step three. Once all technical work has been completed (explained further below) the most appropriate level of growth may be higher or lower than this mid point number.

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

Table 1: 'Starting point' mid point

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

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

Step two: Taking account of market signals

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

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

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

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

Step three: Options for growth

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

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

Table 2. Housing growth: options for comment

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

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

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

Step One

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

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

Step Two

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

Step Three

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

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

7. Planning for travellers

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

8. Where should the growth take place?

Current growth strategy

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

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

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

What are the options for accommodating growth in the future?

8.4 The amount of new development that needs to be planned for in the period up to 2032 is considered earlier in this document. The new local plan will include policies that guide where this growth should be located. There are five alternative approaches that we would like you to consider, however a combination of them or some other option may also be appropriate. In considering the alternatives, you may find it helpful to refer to the sustainability appraisal (see Section 2) which considers the impact of each option on environmental, economic and social conditions. To some extent the final choice of option will also depend on suitable sites being made available for development by landowners (see Section 10).

Option 1 – Continue the current approach



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

8.6 What could this option mean for the borough?

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

Option 2 – Expanded ‘growth area’



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

8.8 What could this option mean for the borough?

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

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



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

8.10 What could this option mean for the borough?

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

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



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

8.12 What could this option mean for the borough?

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

Option 5 – Spread development around existing settlements



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

8.14 What could this option mean for the borough?

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

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

Please explain your answer.

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

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

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

9. Bedford town centre

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

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

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

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

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

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

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

10. Call for sites

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

How do I submit a site for consideration?

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

Bedford Borough Council
Consulting Bedford
FREEPOST ANG5840
Bedford
MK40 1ZD

10.3 This is a freepost address and no stamp is required. Potential housing sites should be capable of delivering five or more dwellings as we will not allocate sites for fewer than 5 dwellings in the local plan. Sites for business development should be a minimum of 0.25ha (or if smaller, capable of providing at least 500m² of floorspace). Your site submission form must be accompanied by a detailed site plan at an appropriate scale identifying the precise site boundaries and highway access. Please make sure you provide all the information required as without it we will not be able to fully consider and assess the site.

How will the call for sites information be used?

10.4 The Call for Sites will help us to:

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

What happens next?

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

How will submitted sites be assessed?

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

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

10.8 To establish a site's availability for development we will consider any legal or ownership issues, such as multiple ownerships, ransom strips¹ or operational requirements of landowners as part of the assessment. A site can normally be considered available for development if the land is controlled by a developer or land owner who has expressed an intention to sell or develop.

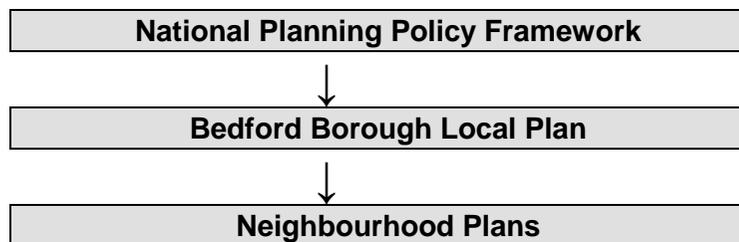
10.9 A site will be considered achievable for development where there is a reasonable prospect of the proposed development coming forward and being implemented over the plan period.

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

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

11. Role of neighbourhood planning

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



¹ See definition in glossary

12. Making decisions on planning applications

12.1 Many development management policies that are used to help the council make decisions on planning applications remain 'saved' from the Bedford Borough Local Plan 2002 and a review of them is currently taking place. The intention is that rationalised and updated development management policies will be included in the new Local Plan 2032.

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

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

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

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

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

Natural environment

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

General development principles

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

- Mixed uses in residential areas and the town centre
- Aviation safety/bird strike
- Waste Audits

Housing policies – Within the urban area boundary and Settlement Policy Areas

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

Employment policies

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

Development in the open countryside

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

Infrastructure, utilities and transport

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

Shopping policies

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

- Farm shops
- Restaurants and takeaways

Recreation, leisure and community facilities

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

New development briefs

- Thurleigh Airfield

Archaeology and heritage

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

Minerals and waste

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

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

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

Bedford Borough Council – Local Plan 2032 Issues and Options Consultation

Response Form

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

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

Bedford Borough Council
Consulting Bedford
FREEPOST ANG5840
Bedford
MK40 1ZD

This is a freepost address and no stamp is required. All responses (electronic and paper) must be received by 5 pm on 24 February 2014.

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

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

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

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

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

Local Plan 2032 draft objectives

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

BEDFORD BOROUGH LOCAL PLAN CALL FOR SITES SUBMISSION FORM

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

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

Bedford Borough Council
Consulting Bedford
FREEPOST ANG5840
Bedford
MK40 1ZD

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

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

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

CONTACT DETAILS

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

Current owner's name and address	
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SITE DETAILS

a)	Address of site <i>Please attach location plan on an Ordnance Survey base clearly showing site boundaries and access to an adopted highway.</i>		d)	Adjoining land uses, if known.	North	South
					East	West
b)	Gross site area (hectares)		e)	Has the site been developed previously?	Yes	<input type="checkbox"/>
					No	<input type="checkbox"/>
c)	Current use of the land <i>Please refer to glossary for definition of use classes.</i>					

2 PROPOSED USE

2.1 What do you think the site should be used for?

a)	What is the primary use you propose for the site? <i>Please refer to glossary for definition of use classes.</i>		b)	For mixed use proposals, what further uses do you propose for the site? <i>Please refer to glossary for definition of use classes.</i>	
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2.2 What type and scale/quantum of development do you propose on this site? For mixed use proposals complete all relevant sections. For housing proposals please ensure you answer questions 4 – 6.

a) For housing (C2/C3 use classes) sites please indicate...						
	The number of dwellings the site could provide.			The type of housing you are proposing	Family houses	<input type="checkbox"/>
					Self-build homes	<input type="checkbox"/>
	What density you have assumed?				Older people housing	<input type="checkbox"/>
					Flats	<input type="checkbox"/>
	The tenures you are proposing?	Market housing				
		Owner occupied	<input type="checkbox"/>			
		Private rented housing	<input type="checkbox"/>			

		Affordable Housing Affordable rent <input type="checkbox"/>			
		Shared ownership <input type="checkbox"/>			
		Other <input type="checkbox"/> <i>Please specify</i>			
b)	For Gypsy and Traveller sites please indicate...				
	If you are proposing the site as a permanent site or transit site. <i>Please refer to glossary for definition.</i>			If the site is privately owned.	Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know <input type="checkbox"/>
	The number of pitches the site could accommodate. <i>Please refer to glossary for definition.</i>				
c)	For Travelling Showpeople sites please indicate...				
	The number of plots the site could accommodate. <i>Please refer to glossary for definition.</i>				
d)	For employment (B1/B2/B8 use classes) sites please indicate...				
	The type of employment the site could provide.			The gross floor space the site could provide.	
e)	For retail sites (A1 only) please indicate ...				
	The type of retail you are proposing.			The net floor space that the site could provide.	
	The gross floor space that the site could provide.				
f)	For hotel (C1 use class) sites please indicate ...				
	The number of hotel rooms the site could accommodate.				
g)	For all other types, including leisure and recreation (D2 use class), community uses (D1 use class) and other uses please....				

	Quantify the amount of development you propose.			Fully describe the use here	
3 SITE SUITABILITY <i>Please refer to glossary for definition.</i>					
3.1	Are there any access constraints to developing the site?				
	No access to an adopted highway. <i>Please refer to glossary for definition.</i>	<input type="checkbox"/>		Please enclose a map clearly showing how access to an adopted highway will be provided and provide details here	
	Current access unsuitable/requires improvement	<input type="checkbox"/>			
3.2	Are there any physical, environmental or other constraints to developing the site?				
a)	Please indicate any known physical constraints to developing the site.				
	Flood risk <input type="checkbox"/>	Ground conditions, such as steep slopes etc. <input type="checkbox"/>		If there are any other known physical constraints, please provide details here.	
	Contamination, pollution or hazardous risks <input type="checkbox"/>	Public rights of way within or adjoining the site <input type="checkbox"/>			
b)	Please indicate any known environmental constraints to developing the site.				
	Heritage assets, conservation or archaeological interests <input type="checkbox"/>	Landscape impacts <input type="checkbox"/>		If there are any other known environmental constraints, please give details here.	
	Sites of Local Importance <input type="checkbox"/>	Vegetation on the site and water bodies <input type="checkbox"/>			
c)	Please indicate any known infrastructure constraints to developing the site.				
	Drainage <input type="checkbox"/>	Water Supply <input type="checkbox"/>		Telecommunications <input type="checkbox"/>	Sewerage <input type="checkbox"/>
	Gas <input type="checkbox"/>	Electricity <input type="checkbox"/>			
d)	Please provide details of any other known constraints to developing the site, including legal/ownership constraints, such as ransom strips, leases or restrictive covenants, here.			e) Could the constraints indicated in <i>Section 3 Site Suitability</i> be overcome? If so, please provide details here.	
f)	Would the development of the site produce	Yes <input type="checkbox"/>	g)	If you have ticked yes to question f)	

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

Glossary of terms

APPENDIX 4

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Site of Local Importance

Includes

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

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

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

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

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

Mixed forms of tenure are also possible.

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

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

Use classes:

Retail

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

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

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

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

Housing

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

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

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

Other

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

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