



BEDFORD BOROUGH **Local Plan 2050**

**Your voice. Planning
a better Bedford together.**

PROJECT INITIATION DOCUMENT

April 2026

BEDFORD BOROUGH COUNCIL



Contents

1	Introduction	4
2	Background and rationale	4
3	Bedford's new Local Plan	11
4	Bedford Borough Local Plan timetable	16
5	Governance and decision making	21
6	Evidence	23
7	Digital approach to plan making	24
8	Risk management and mitigation	25
9	Monitoring and delivery	37
10	Contacts	38

FIGURES

Figure 1: Map of the borough of Bedford	5
Figure 2: Bedford Borough in context	6
Figure 3: Neighbouring planning authorities	7
Figure 4: Bedford's development plan	13
Figure 5: Interrelationship between Bedford Borough Local Plan 2050 and other relevant strategies, plans and programmes	14
Figure 6: Simple timeline	16
Figure 7: New Bedford Borough Local Plan 2050 timeline	20
Figure 8: Governance arrangements and decision making (Bedford Borough	22

TABLES

Table 1: Key changes to the plan-led system	8
Table 2: Overview of the new Bedford Borough Local Plan 2050	15
Table 3: Key tasks of the getting ready stage (phase 1)	18
Table 4: Tiers of governance	21
Table 5: Key risks - Bedford Borough Local Plan 2050	27

1 Introduction

- 1.1 This document sets out the project management framework to guide the preparation of the new Bedford Borough Local Plan, from inception to adoption, establishing clear governance structures, key risks, resource requirements and delivery timelines.
- 1.2 Designed as a live reference tool, it will be updated and reviewed at each stage of preparation to guide effective decision-making and ensure that all stakeholders understand their roles and responsibilities throughout the plan-making process.
- 1.3 Once adopted, the Bedford Borough Local Plan will set out planning policies and proposals to guide future development in the borough up to 2050.
- 1.3 The new plan will be prepared in line with the Levelling Up and Regeneration Act and associated regulations together with other relevant legislation and the requirements of the new National Planning Policy Framework to ensure full consistency and compliance¹.

¹ The new regulations came into effect on 25 March 2026 (see www.legislation.gov.uk/ukxi/2026/169)

2 Background and rationale

- 2.1 Bedford Borough is at a critical juncture in shaping its long-term future. The preparation of a new Local Plan is necessary to respond effectively to the climate challenge and significant demographic, economic and spatial changes now influencing the borough (as defined in figure 1) and the immediate sub-region (as defined in figures 2 and 3). The existing adopted plan is gradually becoming out of date and no longer reflects the scale, distribution or character of growth anticipated across the borough.

Cambridge growth corridor (see figure 2), these developments are reshaping patterns of housing demand, employment activity and leisure provision, both within the borough and across the wider sub-region.
- 2.2 Without an up-to-date plan, the Borough risks being unable to manage growth effectively, secure necessary infrastructure investment or meet its long-term sustainability and net zero objectives.
- 2.3 Bedford Borough is repositioning itself within a rapidly evolving and dynamic sub-regional geography, with transformative projects like the Universal theme park, East West Rail, London Luton Airport expansion and proposed new towns at Tempsford and Milton Keynes, coming forward. Alongside the growing influence of the Oxford and
- 2.4 Achieving the required step change over the plan period will demand sustained cross-boundary collaboration with neighbouring authorities and other stakeholders. Detailed technical work will be carried out to assess the scale of development required, taking account of government targets and the jobs and housing growth associated with the developments listed in paragraph 2.3 and current land supply shortages.
- 2.5 In response, the new Bedford Borough Local Plan must adopt a refreshed spatial strategy which responds to the wider sub-regional context and clearly identifies where new homes, jobs and associated infrastructure should be located. It must explore all potential distribution options and a broad mix of site opportunities, ensuring that future growth is deliverable and aligned with our long-term strategic priorities.
- 2.6 Delivering this growth will require substantial additional infrastructure upgrades to road, rail and wastewater

treatment, where current provision is already under pressure. For instance, key transport corridors along the A421, A1 and M1 (especially junction 13) are already close to capacity, meaning that further significant growth will not be achievable without additional ringfenced investment in improvements such as road dualling, new junctions and bypasses. Additional investment is also needed in schools, open spaces, healthcare facilities, blue light services and utilities to support a growing population.

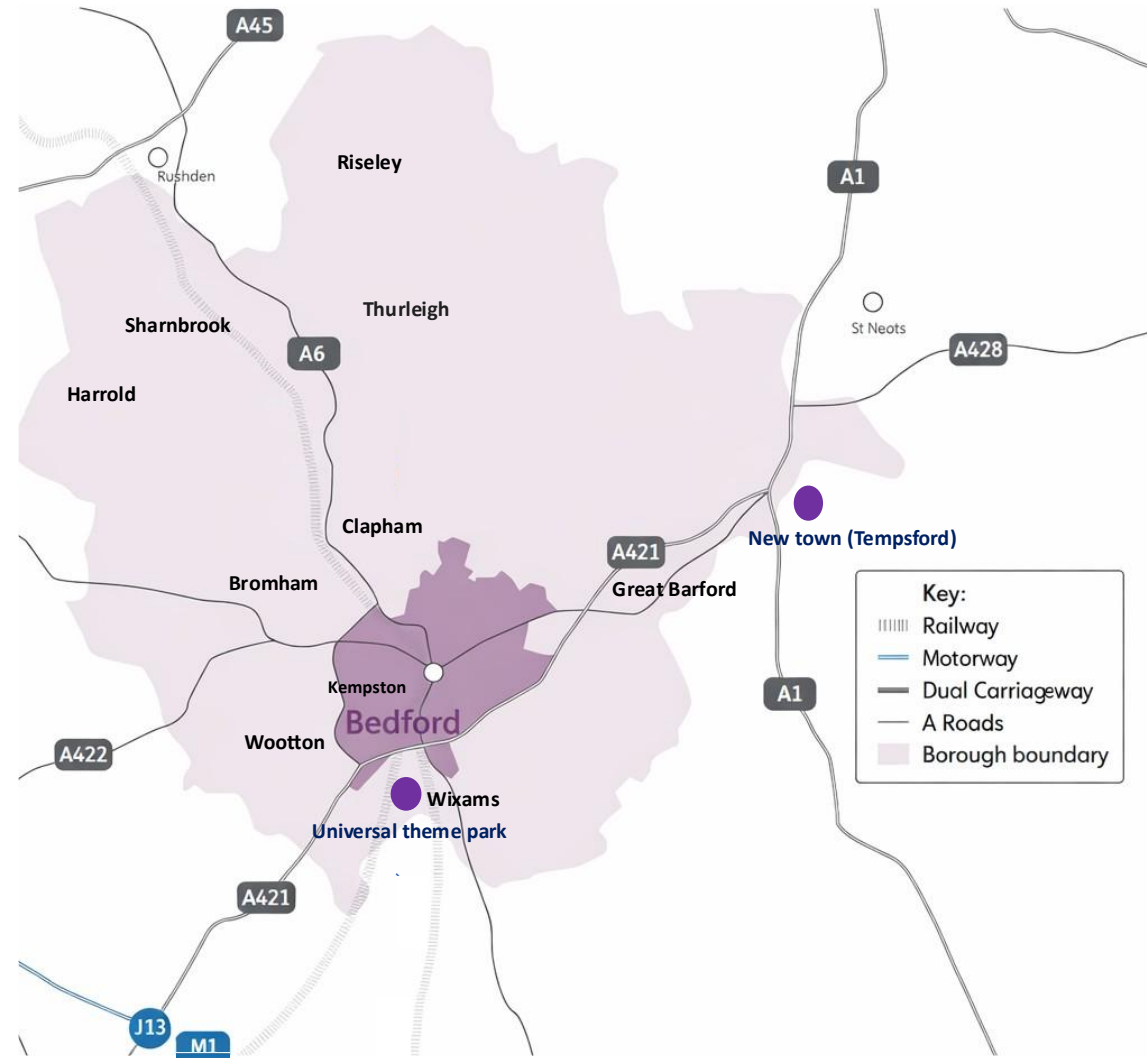
- 2.7 In addition, this growth will need to be planned in a way that protects high quality landscapes, reinforces biodiversity and river networks, diversifies the rural economy and strengthens local services and infrastructure.

Geographical area and sub region

- 2.8 The plan area will cover the administrative borough of Bedford (see figure 1), which lies within the ceremonial county of Bedfordshire in the East of England.
- 2.9 The Borough presents a rich and varied geography, comprising a blend of urban, suburban and rural places. At its heart lies the town of Bedford, the main centre offering employment, services and cultural activities. Kempston, a largely self-contained community, lies adjacent to the town and forms part of the continuous urban area (as

defined in figure 1). Beyond the urban area, the borough extends into a diverse landscape of villages, hamlets and open countryside, forming a distinct, high-quality and largely unspoilt rural setting.

Figure 1: Map of the Borough of Bedford



2.10 Beyond the Borough of Bedford lies a wider sub-region of closely linked cities, towns, villages and employment areas, connected through shared housing markets, transport corridors and economic relationships that extend across Central Bedfordshire, Luton, Cambridgeshire, Northamptonshire and Milton Keynes.

2.11 As illustrated on figure 2, Bedford sits at the centre of this geography, positioned in the heart of the Oxford-Cambridge growth corridor which, together with London, forms the UK's golden triangle – a world-leading hi-tech cluster of prestigious universities, health care, life science and biotechnology companies.

2.12 Working with our key partners (including the Ministry for Housing, Communities and Local Government, Environment Agency, Heritage England, National Highways and Homes England) will allow us to build a shared evidence base, agree funding arrangements and steer development activity across administrative areas (see figure 3) to support the borough's identified needs.

2.13 Careful planning and coordination is therefore essential to ensure the new Local Plan considers the cumulative impacts of the wider sub-regional geography (see figures 2 and 3) and the ways in which cross-boundary growth pressures influence local development choices.

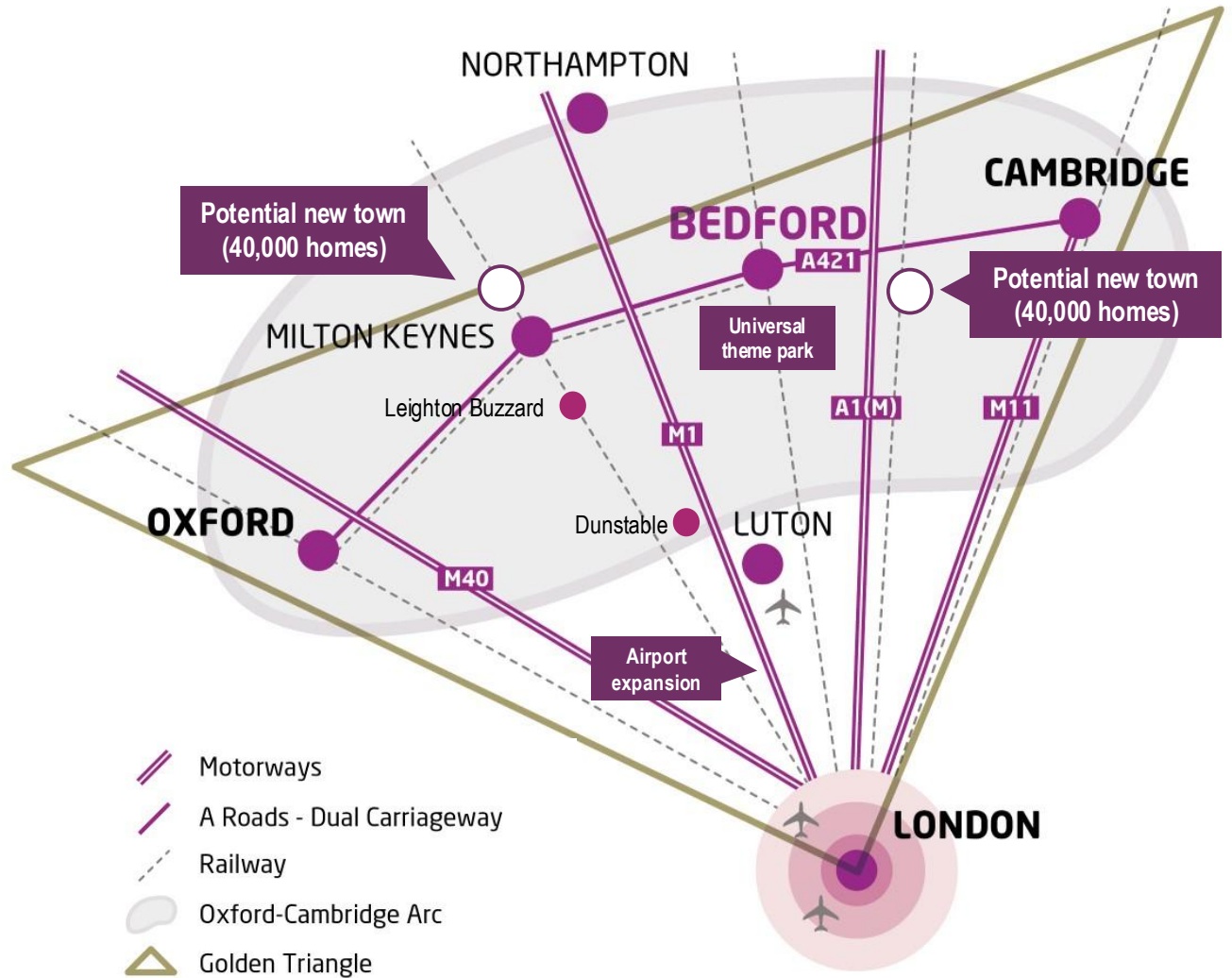
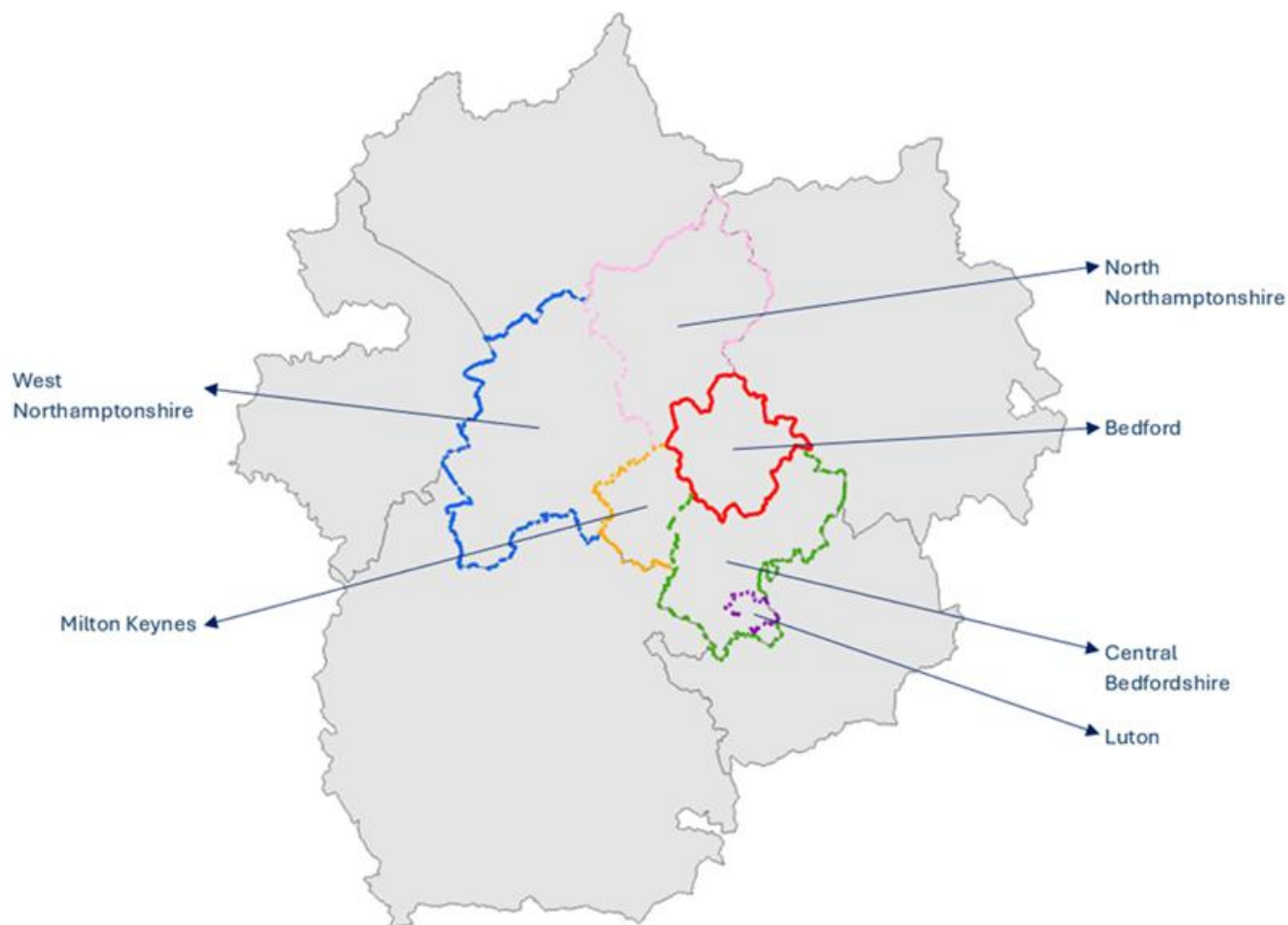


Figure 2: Bedford borough in context

Figure 3: Neighbouring planning authorities



2.14 This geography includes the neighbouring authorities of West Northamptonshire. North Northamptonshire, Central Bedfordshire, Luton and Milton Keynes (the administrative boundaries are illustrated on figure 3).

2.15 The following chapters provide a clear and structured review of the timetable (as summarised on figure 7) and the overall approach to preparing the Bedford Borough Local Plan, which will help residents, businesses, community groups and other stakeholders understand how it will be developed and progressed under the new regulations. They also set out what to expect at each stage and how people can contribute as the work progresses - from early evidence-gathering and engagement, through drafting and consultation to submission, examination and adoption.

2.16 This document also clarifies how the requirements of national planning policies and the updated regulations (Town and Country Planning Regulations 2026) will shape the way the Bedford Borough Local Plan must be prepared, and how the borough's communities can get involved in this process.

New plan process

- 2.17** As a result of the government’s recent reforms, the way that planning decisions are made and Local Plans are prepared is undergoing a fundamental shift.
- 2.18** The government has introduced a new streamlined planning system (see schedule 7 of the Levelling-up and Regeneration Act, which amends the Planning and Compulsory Purchase Act) designed to accelerate and simplify the plan-making process.
- 2.19** The new Bedford Borough Local Plan will need to be prepared in line with the requirements of the new National Planning Policy Framework (the government is due to publish the final version in summer 2026) and the new planning regulations introduced through the Levelling Up and Regeneration Act.
- 2.20** Table 1 outlines the proposed changes to the updated National Planning Policy Framework and other plan-making reforms. Together, these changes will fundamentally reshape how Local Plans are developed and put into practice.

Table 1: Key changes to the plan-led system

Area of reform	Summary of the key change	Implications
Updated National Planning Policy Framework (NPPF)	<p>The new NPPF will introduce fundamental changes to plan-making process, shifting to a more rules-based system to deliver quicker and more consistent outcomes. For plan making, key changes include:</p> <ul style="list-style-type: none"> • reinforcing mandatory housing targets; • seeking higher densities (at least 50 dwellings per hectare) around well-connected railway stations; • the allocation of sites of different scales, including small and medium-sized sites to support delivery and diversification of the housing market; • increasing standardisation of planning rules (e.g. approaches to affordable housing contributions) to improve consistency and reduce negotiation; • placing greater emphasis on climate resilience, renewable energy and nature recovery; • strengthening the relationship between development, infrastructure delivery and long-term spatial planning; • introducing new national decision-making policies to reduce local variation and speed up decisions, particularly where proposals comply with national planning policy rather than relying on detailed local plan provisions; • introducing gateway checks before public examinations to ensure plans remain on track and compliant throughout preparation; and • stronger expectations on delivery and monitoring, including the integration of design coding and clearer development trajectories. 	<p>Local Plans will become clearer, more accessible and more consistently applied. They will be prepared on a faster timetable, kept up to date and carry greater weight in day-to-day decision-making. National policies will take precedence, so Local Plans will no longer repeat or duplicate them.</p> <p>Local Plans will focus on the spatial strategy, site allocations and genuinely local matters, such as area-based change.</p> <p>Standardised national approaches and density expectations will reduce local variation and negotiation, while stronger housing delivery requirements will demand more robust trajectories and a broader mix of sites.</p> <p>Local Plans will also need to demonstrate clear, evidence-based links between development, infrastructure delivery, and long-term spatial planning.</p> <p>These expectations will need to be reflected in the selection and design of development sites, the approach to infrastructure and transport, and the standards applied to new development (e.g. renewable energy and biodiversity net gain obligations).</p>



New regional/sub-regional tier of plan-making	Spatial Development Strategies will establish a wider strategic framework to shape the pattern and scale of development across sub-regions. Where they exist, Local Plans must be prepared in general conformity with them (as per section 15 of the Levelling Up and Regeneration Act).	The new Bedford Borough Local Plan will proceed ahead of the Spatial Development Strategy, as the geography of the strategy has yet been defined and the new regulations/guidance are awaited. However, the Local Plan evidence will need to reflect the main sub-regional growth drivers (see section 2).	How we engage with public bodies	The statutory duty to cooperate has been removed through the provisions of section 7 of the Levelling Up and Regeneration Act.	We will need to address strategic engagement through ongoing collaboration and consultation with relevant authorities and partners (as outlined in the plan preparation process). Public bodies also have a statutory duty to support local planning authorities in preparing their Local Plans.
Flexible approach to timetabling	The preparation and adoption of a Local Development Scheme has been revoked (section 55 of the above act).	A new rolling Local Plan timetable will replace the Local Development Scheme (see figure 7 overleaf).	How we will assess and monitor the effects of the Local Plan	This appraisal will now be referred to as an Integrated Impact Assessment (IIA). IIAs bring together multiple assessments such as equality impact assessments, sustainability appraisals and health impact assessments into a single framework.	An IIA will be undertaken to evaluate and monitor the potential social, economic environmental impacts of the Bedford Borough Local Plan throughout its preparation.
Stronger and more weighty guidance	Supplementary Plans will replace supplementary planning documents (SPDs), providing site-specific policies and area-wide design codes. From July 2026 onwards, SPDs will no longer be required to support specific planning policies in the adopted Local Plan (as defined in paragraph 3.12). Supplementary Plans will undergo rigorous consultation and independent examination and, once adopted, will carry the same weight as Local Plans.	All relevant guidance from existing SPDs and development briefs will be incorporated into the new Bedford Borough Local Plan or, where appropriate, into a subsequent Supplementary Plan. Design quality principles will be embedded into formal design codes.	More streamlined and authoritative Local Plans	Policies within the new Bedford Borough Local Plan will carry greater weight in decision-making compared to the current adopted version. Any departure from these policies will require strong justification.	For Bedford borough, this enables a plan that is fully up to date, aligned with national policy and better able to protect and enhance environment, support sustainable growth and strengthen climate resilience.
New engagement processes	The preparation of a Statement of Community Involvement is no longer a mandatory requirement.	Our approach to engaging the public and other stakeholders during the preparation of the new Bedford Borough Local Plan will be outlined in the engagement strategy, which will be published at the scoping consultation stage.	Proactive, data driven, map-based approach	Plans must be produced in a standardised, machine-readable, map-based format using consistent geospatial data standards	All working drafts of the Bedford Borough Local Plan will be published online in PDF and HTML formats, using standardised templates where available. Policies will be presented more clearly and visually to enhance understanding and support day-to-day decision making on planning applications.

2.21 In its recent consultation, the government proposes that Bedford, Central Bedfordshire, Luton and Milton Keynes work together as a sub-regional grouping to prepare a Spatial Development Strategy, reflecting the interconnected housing markets and infrastructure needs that require coordinated planning, especially with East West Rail and the Universal theme park (as shown on figure 1) shaping future growth².

2.22 Once this geography has been agreed, formal arrangements will be put in place - including the establishment of a 'foundation strategic authority' to prepare the Spatial Development Strategy on behalf of the constituent local authorities. The foundation strategic authority will serve as the main decision-making body overseeing cross-boundary strategic planning issues – including transport, growth, regeneration, economic development and infrastructure delivery - across the sub-region³.

2.23 The government has instructed local planning authorities to continue preparing new Local Plans rather than pause until the Spatial Development Strategies are formally adopted⁴. Although the Bedford Borough Local Plan will eventually need to be in general conformity with the Spatial Development Strategy, the absence of an up-to-date Local Plan means that progress must continue to ensure the borough's housing and employment needs and other priorities are met in a timely and coordinated manner, consistent with best practice.

2.24 Where possible and appropriate, we will seek to work with neighbouring authorities and other public bodies to share evidence (e.g. modelling forecasts) and ensure consistent datasets and alignment between the two processes.



² www.gov.uk/government/consultations/areas-for-producing-spatial-development-strategies/areas-for-producing-spatial-development-strategies

³ as established through the English Devolution and Community Empowerment Bill (2025) and the Planning and Infrastructure Act (2025).

⁴ www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system

3 Bedford's new Local Plan

- 3.1 The Bedford Borough Local Plan will establish how the area will grow and develop over the period to 2050. It will outline how the borough can respond to the critical challenge of climate change and where new homes, businesses and infrastructure will be located and how they will be delivered, while protecting and enhancing important environmental and historic assets.
- 3.2 As a unitary planning authority, we have a statutory duty under the Planning and Compulsory Purchase Act 2004 and amendments through the Levelling Up and Regeneration Act 2023 to prepare, implement and review a Local Plan.
- 3.3 Once adopted, the new Bedford Borough Local Plan will be the main document that determines the direction and outcomes of planning decisions in the borough. It will also give communities more influence over how their neighbourhoods evolve and enable them to take an active role in future decision making.

3.4 However, failure to adopt the new Local Plan would prevent us from meeting our statutory obligations and expose Bedford to greater risks, including speculative planning applications and significant costs through defending planning appeals. These risks have already been identified in the risk register (see table 5).

3.5 Without an up-to-date Local Plan, the borough is at risk of falling behind on national housing delivery targets, which could trigger 'penalties' like a housing delivery test action plan and, in the worst case, government intervention in plan making or decision making. In addition, securing and delivering critical infrastructure investment would become more complicated and challenging, placing further strain on existing systems that are already close to, at, or over capacity in Bedford.

Time period

3.6 The new Local Plan will relate to the whole of the borough and will look ahead to 2050 to ensure alignment with:

- national priorities, including net zero commitments and other planning policy requirements;

- the expected timelines of neighbouring Local Plans (including Central Bedfordshire, Huntingdonshire, Luton, North Northamptonshire and Milton Keynes);
- the extended timeframe of the Spatial Development Strategy (at least 20 years); and
- the anticipated delivery timescales of the proposed standalone new towns at Tempsford and Milton Keynes⁵ and associated infrastructure (including East West Rail and the Universal theme park).

3.7 The new Local Plan will also be reviewed at least once every five years to ensure its policies remain relevant, effective and aligned with the requirements outlined in the National Planning Policy Framework and regulations.

Overall purpose

3.8 The aim is to deliver an up-to-date and comprehensive Local Plan based on the principles of sustainable development, balancing economic, social and environmental objectives to create thriving communities, promote economic growth,

⁵ In March 2026, the government confirmed that Tempsford and a northern expansion of Milton Keynes are two of the seven locations advancing within the new towns programme (www.gov.uk/new-towns).

protect natural assets and strengthen climate resilience. It will:

- be founded on robust and justifiable evidence to ensure sound decision making;
- meet the tests of soundness and legally compliance - as enshrined in government legislation);
- provide sufficient levels of growth and infrastructure in the right locations and at the right time, offering greater certainty about what development is appropriate in different areas; and
- deliver meaningful community involvement and active engagement, enabling local people and organisations to help shape the places where they live and work and influence where development takes place.

Summary of the proposed scope

3.9 The new Local Plan will be prepared as a single, integrated framework that consolidates, updates and replaces the existing suite of adopted development plan documents (as listed in paragraph 3.12). It will include:

- a long-term vision and supporting objectives that will shape the future planning and development of the borough and support the transition to net zero;

- the overall strategy that will guide the pattern, scale, distribution and quality of new development, responding to priorities such as climate change mitigation and adaptation, healthy lifestyles, nature recovery and town centre regeneration;
- detailed policies to guide specific development types such as affordable housing, retail, leisure and commercial development;
- a portfolio of development sites and area-based development opportunities to meet identified housing, employment and other needs; and
- mechanisms to ensure timely infrastructure delivery and community facilities.

3.10 Policies will focus on specific local priorities and needs that are most important to local communities and stakeholders like open space and health provision, while the new NPPF will set out general standards to guide decision-making on matters such as design quality, infrastructure and environmental protection.

3.11 The outcome will be a more concise and streamlined Local Plan, containing fewer policies and a stronger focus on how allocated sites should be planned and delivered. Compared to previous plans there should be less duplication of national

level guidance. It will also be digitally accessible using Ordnance Survey mapping, high quality graphics and visualisations.

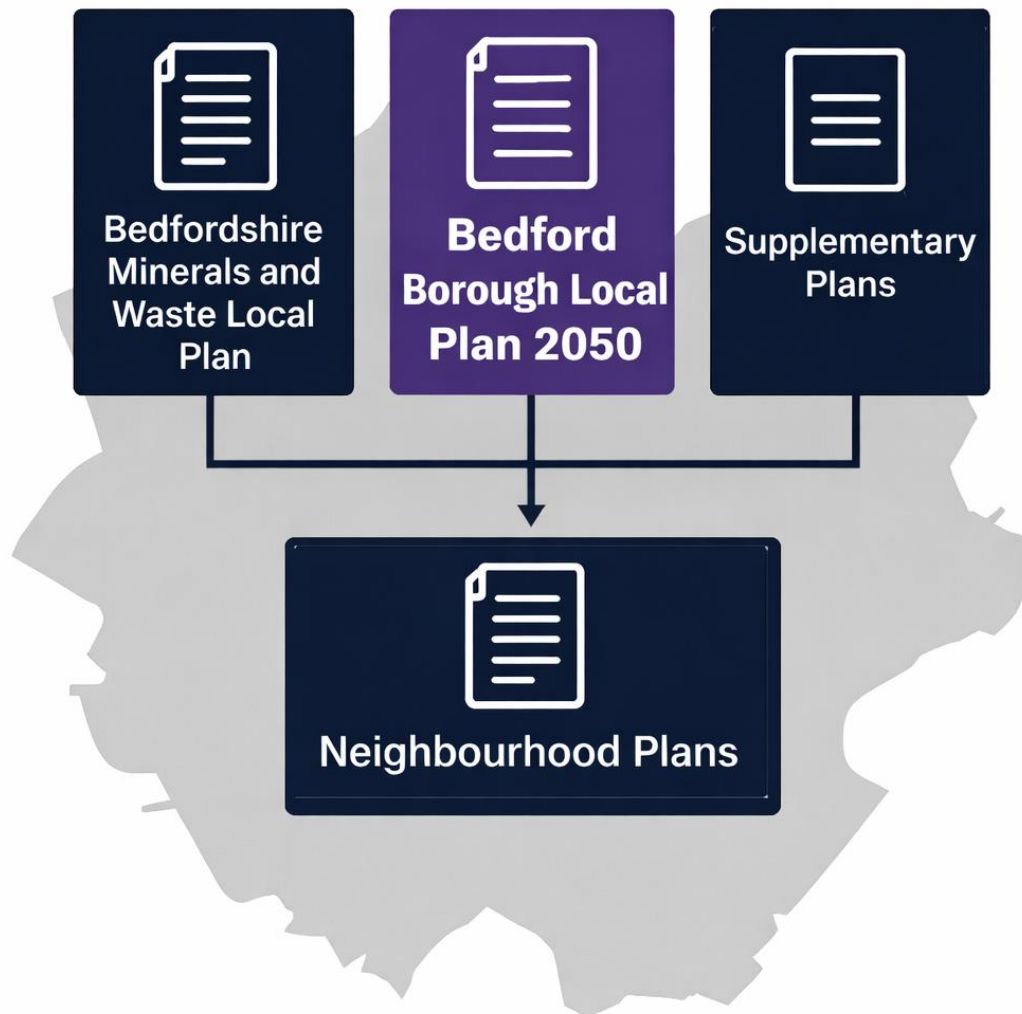
3.12 The current adopted Local Plan is based on the saved policies contained in the following documents:

- [Bedford Borough Local Plan 2030 \(adopted in 2020\)](#).
- [Bedford Borough Local Plan 2002 \(adopted in 2002\)](#).
- [Bedford Borough Allocations and Designations Development Plan Document \(adopted in 2013\)](#).

3.13 Collectively, these documents are still used in decision-making to guide development proposals across the borough. However, they now need to be updated to ensure full alignment with the government's latest legislative and policy requirements.

3.14 Once adopted, the new Bedford Borough Local Plan 2050 will carry significantly more weight in planning decisions than under the previous system. In other words, it will become the primary basis on which decisions relating to the location, scale and design of new developments are determined in the borough over the plan period.

Figure 4: Bedford borough's development plan



3.15 The new Local Plan will form part of the borough's development plan (as illustrated on figure 4) and sit alongside the following statutory documents. Each document will perform a different and distinct role:

- The **Bedford Borough Local Plan** will provide the overall strategic and detailed policies to guide future development across the borough up to 2050.
- The **Bedfordshire Minerals and Waste Plan** will explain how minerals like sand and gravel are managed and how waste is handled across the former county - from recycling, recovery of energy from waste and landfill disposal to the long-term restoration of former mineral extraction sites.
- **Supplementary Plans** will provide focused guidance on specific areas or sites, such as design codes, and carry the same status and weight as the Local Plan in the decision-making process. These will be defined and progressed through separate, targeted workstreams.
- **Neighbourhood Plans** set out community led policies that guide development within parishes or neighbourhood forum areas. Any new or updated plans must be in general conformity with the strategic policies set out in the Bedford Borough Local Plan and the other plans shown on figure 4. Further information about the role and status of these plans can be found at www.bedford.gov.uk/planning-and-building-control/planning-policy).

3.16 Once adopted, these plans will become the basis on which all planning applications in the borough are determined, in conjunction with the requirements outlined in the National Planning Policy Framework and any other relevant material considerations.

3.17 When the Spatial Development Strategy is formally adopted, it will also become part of the borough's development plan, establishing the overall framework (see table 1) within which the other plans in the hierarchy (see figure 4) will sit.

3.18 In the meantime, the new Bedford Borough Local Plan will continue to steer decision making on development proposals across the borough. It will allocate and deliver specific development sites, while the Spatial Development Strategy will define broad locations where growth will take place across the wider sub-region.

3.19 At the corporate level, the new Bedford Borough Local Plan will support the implementation of the Corporate Plan (2024/5 – 2027/8) and provide a spatial expression of its strategic priorities. It will also maintain strong links to other key strategies, plans and programmes within the borough (as illustrated in figure 5).

Figure 5: Interrelationship between Bedford Borough Local Plan 2050 and other relevant strategies, plans and programmes

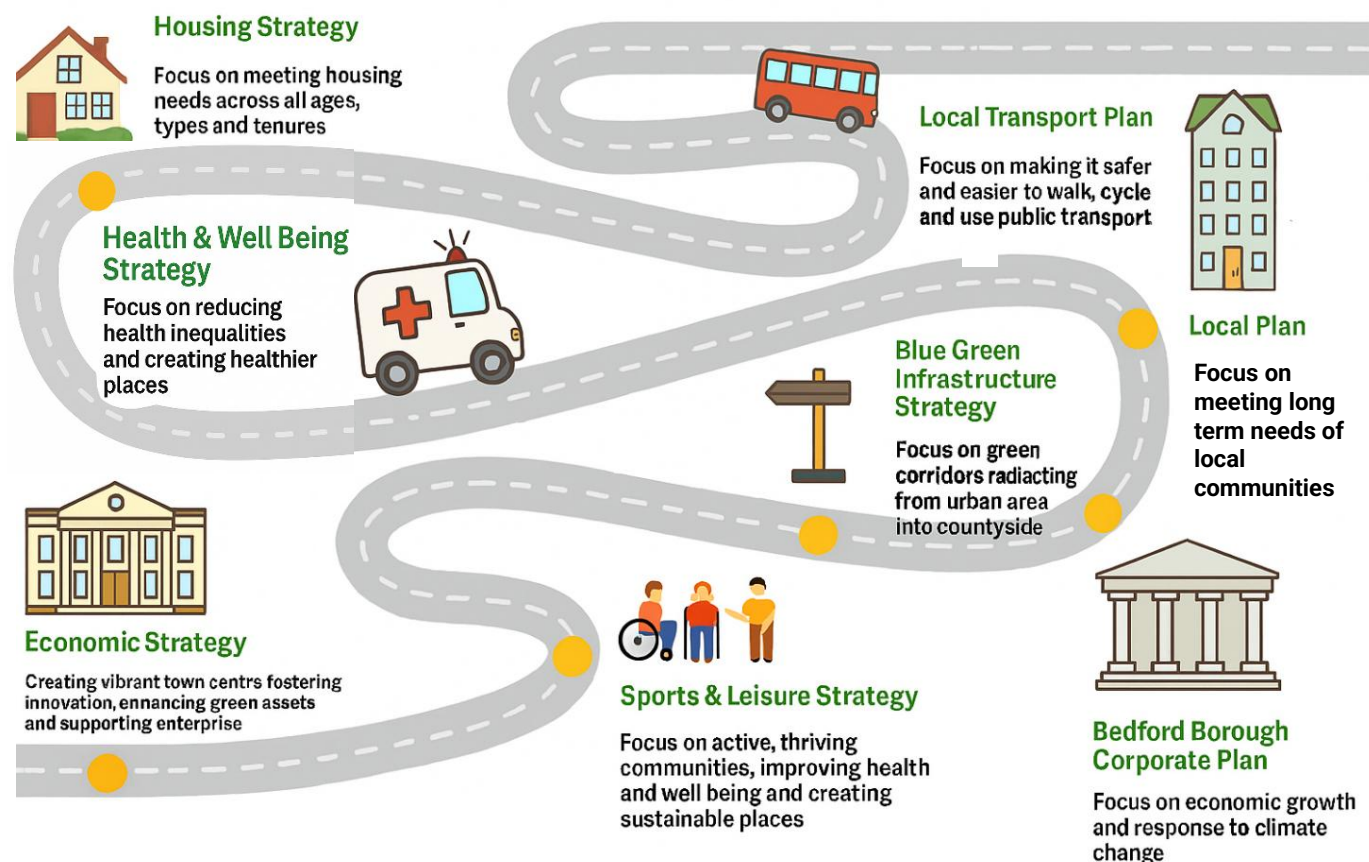


Table 2: Overview of the new Bedford Borough Local Plan 2050

Topic	Description
Role/content	The new Bedford Borough Local Plan will set out the vision, objectives and policies to guide future development across the borough - excluding matters relating to the provision of minerals and waste management - up to 2050.
Geographic area	Borough-wide
Status	As described in the Town and Country Planning (Local Planning) (England) Regulations 2026. It is known as a development plan document.
Which 'saved' policies will it replace?	<ul style="list-style-type: none"> • Bedford Borough Local Plan 2002 (adopted in 2002) • Bedford Borough Allocations & Designations Local Plan (adopted in 2013) • Bedford Borough Local Plan 2030 (adopted in 2020)
Chain of conformity	National planning policy (National Planning Policy Framework) and guidance (National Planning Practice Guidance) and relevant legislation.
Process	By whom
Management arrangements	<ul style="list-style-type: none"> • Corporate Leadership Team will be provided with progress reports to the Portfolio Holder for Economic Growth, Planning and Prosperity (including Town Centres) • Cross-party member working group (see section 5) • Executive approval (public consultations) • Full Council approval (at key milestones – submission and adoption) • Delegated approval to the Portfolio Holder for Economic Growth, Planning and Prosperity (including Town Centres) to update the timetable in line with our constitution (see www.bedford.gov.uk/your-council)

Topic	Description
Resources required	<ul style="list-style-type: none"> • We will require support from external partners and consultants (where work requires certain specialist expertise) and other stakeholders. • Resources allocated via the core budget process and alternative funding/resources sources (if applicable)
Stakeholder & community involvement	<ul style="list-style-type: none"> • We will set clear standards for how we engage with individuals, communities and other stakeholders in the preparation of the new Bedford Borough Local Plan through a new engagement strategy (which will be published at the scoping stage)
Monitoring and delivery	<ul style="list-style-type: none"> • Under the new plan-led system, the Bedford Borough Local Plan will include a straightforward monitoring and review system to check how well its policies are performing over its lifetime, Annual reviews of data on new homes, jobs and environmental outcomes will help identify where updates may be required. • The Bedford Borough Local Plan will also explain how different development sites and projects will be delivered, including anticipated timescales, the organisations and partners involved and the mechanisms through which delivery will be secured. • If progress slows or challenges arise, action such as updating policies or strengthening collaboration between partners will be taken to keep the Bedford Borough Local Plan on track and ensure it continues to meet identified needs throughout its lifetime. • We will monitor the implementation of the Bedford Borough Local Plan against the long-term measurable outcomes outlined in the emerging vision. Specific milestone targets will be used to track the progress of major development projects and sites across the borough.

4 Bedford Borough Local Plan timeline

- 4.1 Under the new plan-led system, we must prepare and maintain a detailed timetable that sets out specific milestones, from inception to adoption. This includes the start and end of public consultation periods and the dates when key outputs will be published, such as gateway assessments⁶.
- 4.2 The Bedford Borough Local Plan preparation process will be divided into three main phases (as illustrated on figures 6 and 7):

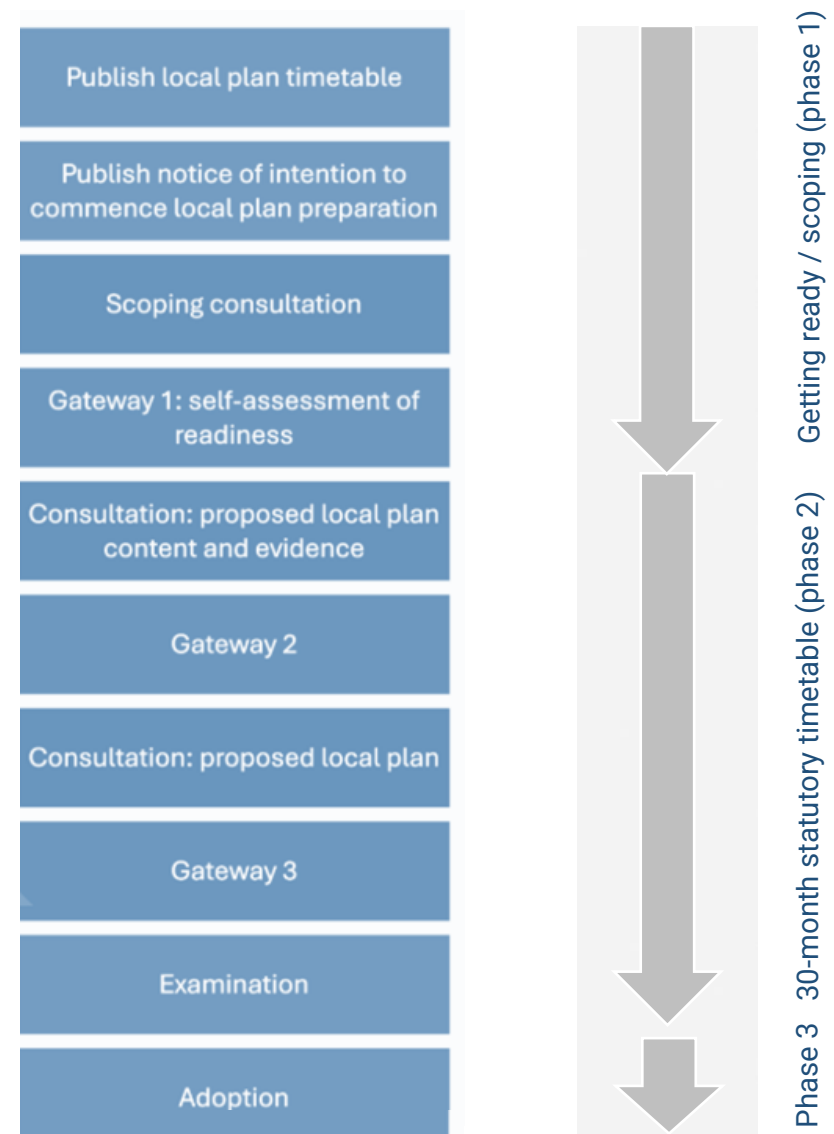
Phase 1 involves establishing the scope of the emerging plan (known as ‘getting ready stage’) and the key priorities it should address. It includes a 6-week public consultation on the scope of the plan and how we will engage with residents, businesses, public bodies and other stakeholders throughout this process.

Phase 2 covers the preparation of the new plan within the expected 30-month timeframe, including:

- two separate public consultations on its evolving content; and
- the formal process of submission and examination, during which the draft plan will be submitted to the secretary of state to undergo independent examination. It will be assessed against legal requirements and tests of soundness (as set out in paragraph 4.13).

Phase 3 covers the formal adoption of the plan, including implementation of its policies in decision-making and the completion of all the necessary statutory steps to bring it into full effect.

Figure 6: Simple timeline*



⁶ The new Levelling Up and Regeneration Act replaces the previous requirement to adopt a Local Development Scheme with a new requirement to prepare and maintain a Local Plan timetable.

* mhclgdigital.blog.gov.uk/2025/12/08/new-draft-guidance-published-to-support-faster-and-clearer-local-plan-making

- 4.3 From the initial scoping stage through to adoption, this process will take around two and half years. You will have plenty of opportunities to share your views and shape the final outcomes.
- 4.4 Under the new plan-led system, the timetable (as illustrated in figure 6) must be kept up to date, with monthly updates where necessary to show progress against the agreed milestones. The timetable must also be made publicly available on our website⁷. The timetable from the early preparation stage (phase 1) through to the independent examination (phase 2) will cover a 30-month period, with up to 6 additional months allowed in government legislation to enable public consultation on proposed changes to the Bedford Borough Local Plan during the examination⁸.
- 4.5 Elected members and other stakeholders will be engaged early in the process to build consensus and support around the emerging vision, aims and objectives of the new Bedford Borough Local Plan before the formal 30-month timetable begins (phase 2).

⁷ www.gov.uk/guidance/30-month-local-plan-process-an-overview#before-the-30-month-process-starts.

⁸ as outlined in the Local Plan Explainer (see www.gov.uk/government/publications/plan-making-regulations-explainer/plan-making-regulations-explainer) and the new regulations

Informal scoping stage – ‘getting ready overview’

- 4.6 Before the 30-month timeframe begins, we can take preparatory steps to ensure a strong start to the new Bedford Borough Local Plan process (phase 1). This proactive stage is designed to minimise risks and reduce potential challenges later in the process and will include a six-week informal public consultation on the scope of the emerging plan, where we begin to collect background evidence and define the key issues, opportunities and priorities that will shape the direction of this plan.
- 4.7 Neighbouring planning authorities (see figure 3) are proactively engaging in early informal discussions to help facilitate the transition towards the new system. Once the government has confirmed the geography of the new Spatial Development Strategy (SDS) in this sub-region, a more formalised agreement will need to be established between the constituent partners, particularly in relation to preparing the sub-regional evidence base to support Local Plans and act as a precursor to the SDS.

⁹ www.gov.uk/guidance/gateway-1-what-you-need-to-do

- 4.8 The forthcoming public consultation will provide an opportunity to understand what matters most to stakeholders and refine the key priorities shaping the emerging vision and objectives of the Bedford Borough Local Plan. Comments will be invited on what the new plan should cover and how people and organisations should participate in this process.
- 4.9 Table 3 summarises the key outputs from the ‘getting ready’ stage (phase 1), with links to the relevant sources in recently published government guidance.
- 4.10 We will begin gathering the baseline evidence and putting in place the project management arrangements needed to ensure the plan process starts with the right resources. Once this stage is complete, we will use the government’s readiness tool (gateway 1 self-assessment) to confirm alignment with the required procedures before entering the formal Local Plan process (phase 2)⁹.

Table 3: Key tasks of the getting ready stage (phase 1)

Key tasks	How this will be addressed	Source
Publish timetable		
Sets out milestones and stages of the process, from inception to adoption, on a rolling basis	The Bedford Borough Local Plan 2050 timetable (see figure 5) indicates when the public and other stakeholders can participate in this process.	www.gov.uk/guidance/getting-ready-to-prepare-a-new-plan
Notice of intention to prepare a new plan		
Formally confirms the start of the new plan, explaining where the timetable and other relevant information can be accessed.	The timetable and formal notice of commencement (HTML version) have been published at the same time on our website at www.bedford.gov.uk/planning-and-building-control/planning-policy	www.gov.uk/guidance/giving-notice-of-your-plan-making
Establish project management and governance arrangements	We will develop a robust approach to effectively manage, govern and resource the preparation of the new Local Plan in line with the agreed timetable. We will identify potential risks and put effective processes in place to monitor and mitigate them (see table 5).	www.local.gov.uk/pas/plans/new-plan-making-system-what-we-know-so-far/planning-plan-new-plan-making-system
Call for sites		
Identify potential development site opportunities	Developers, landowners and other interested parties will be invited to nominate potential land parcels/sites to help meet future development needs.	www.gov.uk/guidance/selecting-identifying-and-assessing-sites-for-local-plans
Scoping consultation		
Scope out what the overall strategy and supporting policies should contain	We will seek views on the proposed scope of the new Local Plan. HTML and PDF versions will be available to view from our website, with hard copies accessible in libraries and at the Bedford Borough Hub during normal opening hours.	www.gov.uk/guidance/30-month-local-plan-process-an-overview#before-the-30-month-process-starts
Gather baseline evidence	We will gather data and information from various sources and undertake a detailed SWOT analysis to inform the scoping stage, linked to a new digital baseline.	www.gov.uk/guidance/gathering-baselining-information-to-inform-a-local-plan

Key tasks	How this will be addressed	Source
	We will also review the latest monitoring information (e.g. land supply and delivery numbers) associated with existing plan policies. We will also gather relevant information to establish the baseline in the Integrated Impact Assessment.	
Identify and scope evidence needs	Evidence will be identified and largely scoped during this consultation, drawing on the latest baseline data.	See above
Undertake a SWOT analysis to identify key priorities	This analysis will be grounded on the latest baseline evidence (e.g. spatial mapping) and a comprehensive review of existing plans, strategies and programmes.	www.gov.uk/guidance/preparing-a-local-plan-vision
Define the proposed long-term vision and measurable outcomes to guide future growth	We will seek early engagement on a draft vision and supporting objectives to help shape and define key priorities. We will also identify measurable outcomes to monitor progress towards the new vision.	www.gov.uk/guidance/preparing-a-local-plan-vision
Prepare an engagement strategy	We will seek views on the most appropriate ways to engage the public and other stakeholders throughout the plan process.	www.gov.uk/guidance/30-month-local-plan-process-an-overview
Ask questions to stakeholders based on early work on key priorities and evidence set out in the SWOT analysis	The consultation will include a structured list of questions aligned to specific thematic priorities. We will also request project ideas from residents and other interested parties such as new greenspaces and community woodlands to ensure the Local Plan reflects local priorities and encourages community involvement.	www.gov.uk/guidance/preparing-a-local-plan-vision
Scope of the Integrated Impact Assessment (IIA)	We will prepare an initial scoping paper to define the high-level objectives, relevant plans and programmes and baseline information needed to assess and monitor the social, economic and environmental impacts of the Local Plan as it develops.	www.gov.uk/guidance/getting-ready-to-prepare-a-new-plan www.gov.uk/guidance/gathering-baselining-information-to-inform-a-local-plan
Site assessment and selection	During the consultation, we will invite views on the emerging draft site selection methodology to guide the assessment of potential development sites once identified through the call for sites.	www.gov.uk/guidance/selecting-identifying-and-assessing-sites-for-local-plans

4.12 Once the formal process begins, we will have 30 months to prepare the new Bedford Borough Local Plan (excluding any further public consultation that takes place during the examination stage). This will involve:

- **two rounds of public consultation** on the content of the new plan

6-week consultation on the emerging plan, including alternative options (potential development sites and policies)

8-week consultation on the final draft plan, including the full suite of policies and proposals in response to consultation feedback and new evidence

- **two gateway assessments:** The Planning Inspectorate will undertake two independent checkpoints to verify that the plan is robust, compliant and progressing appropriately between the two consultation stages.

Gateway 2: Review the progress of the plan against specific requirements

Gateway 3: Confirm soundness and legal compliance: a stop/go assessment of the plan before it is submitted to the secretary of state*

* If the final gateway stage identifies soundness issues, this stage may require additional engagement (including a focused consultation exercise) to resolve outstanding matters before the plan can proceed to submission.

- an **independent public examination** following submission of the final draft plan to the secretary of state. The government-appointed planning inspector overseeing the examination will assess whether the plan has been prepared in line with the regulations and whether it can be found sound.

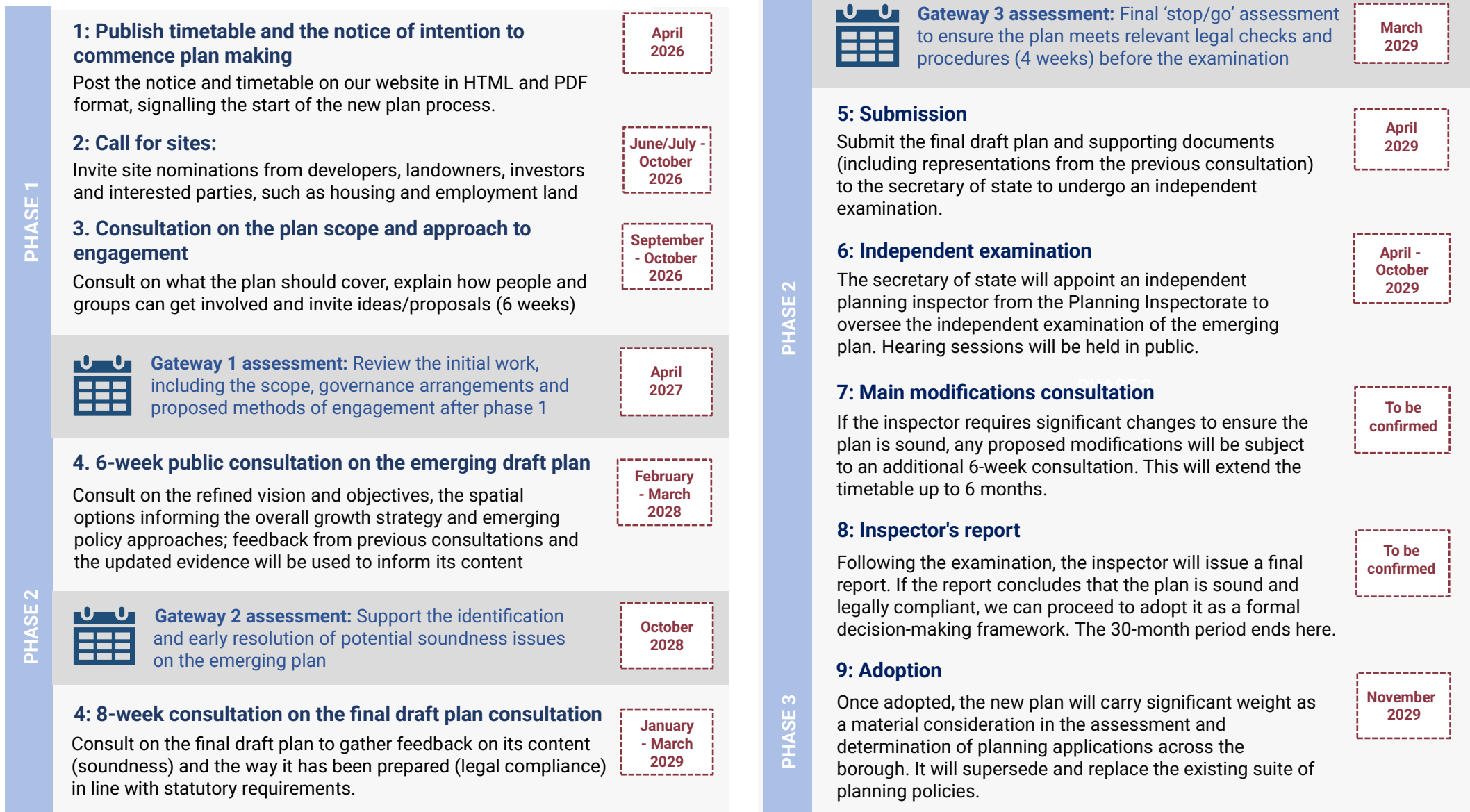
4.13 The draft National Planning Policy Framework proposes updates to the tests of soundness that will, once finalised, be used to assess the plan at the examination. For the plan to be considered 'sound', it must be:

- **positive** – the plan sets out a positive approach to delivering growth to meet the development needs of the area;
- **appropriate** – the plan sets out an appropriate strategy to enable the delivery of sustainable development, taking into account reasonable alternatives;
- **realistic** – the plan sets out realistic policies and based on effective joint working on cross-boundary strategic matters and there is a reasonable prospect that site allocations are capable of being deliverable at the time envisioned;
- **consistent** – the plan accords with the policies in the National Planning Policy Framework; and
- **conformity** – the plan is in general conformity with any adopted spatial development strategy (see table 1).

4.14 After the examination hearings and receipt of the inspector's report, approval will be sought from members of the Executive and Full Council to formally adopt the new plan as a statutory development plan document.



Figure 7: Bedford Borough Local Plan 2050 timetable



* Once the final draft plan is submitted to the secretary of state, the planning inspector assumes control over the examination process (including the scheduling of the hearing sessions and any subsequent public consultation on proposed changes to the plan).

** At gateways 2 and 3, the Planning Inspectorate, acting on behalf of the secretary of state, will appoint a gateway assessor to review the emerging plan, along with its associated evidence.

5 Governance and decision-making

5.1 Preparing the new Bedford Borough Local Plan will require close collaboration between elected members, council officers, partner organisations and agencies, infrastructure providers, developers, landowners, residents, businesses and local groups to ensure a comprehensive and effective.

Table 4: Tiers of governance

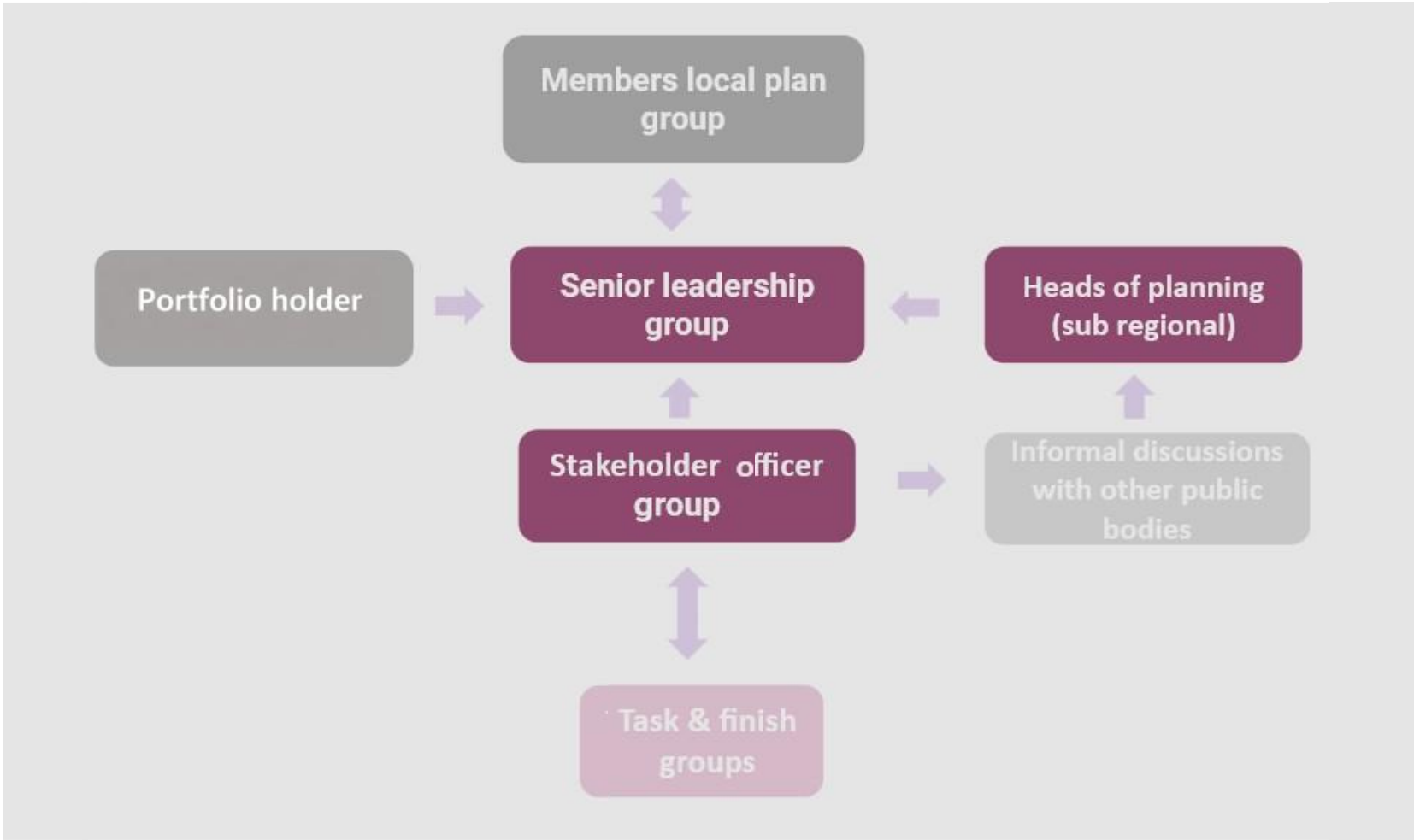
Tier	Description	When	Who
Bedford Borough Local Plan member group	<ul style="list-style-type: none"> An informal cross-party working group will be established to provide political direction and advise on the development of the emerging plan as it progresses. This group will serve as a sounding board and source of political buy-in and consensus, but it does not hold any formal decision-making powers. 	At the main stages of preparing the new plan and as required	Chair and sponsor: Portfolio Holder for Economic Growth, Planning and Prosperity (including Town Centres)
	<ul style="list-style-type: none"> Separate progress meetings will be held between the Head of Planning and Building Control, Manager for Planning Strategy and Policy and Portfolio Holder for Economic Growth, Planning and Prosperity (including Town Centres). 	Monthly	High-level oversight: Head of Planning and Building Control
Bedford Borough Local Plan	<ul style="list-style-type: none"> Officers from land and property, pupil place planning, transport and highways, housing, social care, leisure 	At least every 2 months	

stakeholder group	and culture, public health, environmental protection (e.g. flood risk, heritage, waste and recycling, contamination and greenspace) and other service areas will meet regularly to review progress and coordinate their contributions to the new plan.		
Task and finish groups	<ul style="list-style-type: none"> Separate task and finish groups will be established to conduct in-depth reviews of complex topics like housing, education, public health, transport, climate change and town centres. 	Ongoing	
Planning strategy and policy team	<ul style="list-style-type: none"> The team oversees the day-to-day preparation and implementation of the plan It also manages the budget, evidence base, public consultations, stakeholder engagement and wider work programme. 	Ongoing	

5.2 We will hold informal meetings with neighbouring planning authorities from Milton Keynes, Central Bedfordshire, Luton and other public bodies (including government bodies, infrastructure and service providers and local nature partnerships and other strategic organisations) to discuss progress on Local Plans and, where appropriate, share joint evidence and pool resources.

5.3 When cross-boundary issues affecting Local Plans cannot be resolved at working-group level, they will be escalated to the heads and directors of planning to secure timely and efficient resolution of complex matters affecting multiple jurisdictions.

Figure 8: Governance arrangements and decision making (Bedford Borough Local Plan 2050)



Evidence

- 6.1** Successful delivery of the new Bedford Borough Local Plan relies on coordinated collaboration across a range of internal and external partners. It will be important to harness the expertise and input of government departments, local planning authorities, private consultants and specialist advisors to ensure the plan is comprehensive, evidence-led and deliverable.
- 6.2** As part of the new plan process, we are required to:
- prepare technical evidence and detailed assessments, including Integrated Impact Assessments, Habitat Regulations Assessments, Housing and Employment Land Availability Assessments and whole-plan viability studies;
 - provide specialist data and insights, such as transport modelling, retail capacity analysis, housing and employment needs, greenspace audits, archaeological surveys, health impact assessments, school places forecasting and car/lorry parking demands;
 - produce detailed mapping and spatial analysis, including ecological network mapping, landscape sensitivity testing, site constraints, urban capacity and density thresholds, flood-risk and water catchment mapping and settlement capacity patterns; and
 - address cross-boundary impacts, including strategic warehousing and logistics, overlapping employment and housing markets and wider infrastructure considerations - such as traffic movements, commuting patterns, sewage and water supply capacity and tourism pressures - reflecting Bedford's strategic position within the
 - fast-growing Oxford-Cambridge growth corridor (see figure 2) and wider economic drivers (see paragraph 6.5).
- 6.3** We will publish an initial list of evidence base documents at the scoping consultation. This list will not be exhaustive, and further technical studies and background papers will be prepared as the Local Plan progresses.
- 6.4** Much of the evidence base will need to cover a wider geography (as than the borough (as illustrated on figures 2 and 3). Discussions are ongoing on how best to achieve this.
- 6.5** While the evidence will draw on earlier technical work, circumstances have changed since the adoption of the current Local Plan (as defined in paragraph 3.12). Most notably, these include:
- the proposed Universal theme park is a multi-billion-pound project expected to deliver over 8,000 permanent jobs and 20,000 construction jobs, with opening anticipated in the early 2030s;
 - the designation of Tempsford as one of seven new towns, with 40,000 new homes planned to maximise the benefits of East West Rail¹⁰;
 - major infrastructure upgrades through East West Rail, including new stations at Wixams (to serve Universal) and Bedford St Johns, alongside a redeveloped Bedford station and a new station at Tempsford, with connections to the East Coast Mainline; and
 - the proposed expansion of London Luton Airport, increasing capacity and associated infrastructure demands.

¹⁰ The new town at Tempsford will be expected to contribute towards meeting the borough's identified housing needs (New Towns Planning Policy, MHCLG, 23 March 2026). The Bedford

Borough Local Plan 2050 will identify the proposed location of the new town - which straddles Central Bedfordshire - and its proposed scale, including the infrastructure required to support it.

7 Digital approach to plan making

7.1 As outlined in chapter 2, the Bedford Borough Local Plan 2050 is being prepared within a new streamlined planning system, evolving from a static, document-focussed product into an interactive, map-based and data-driven digital platform. This chapter expands on that baseline and outlines how the new Local Plan will adopt a digital-first approach that:

- **enhances interactivity:** Users will be able to zoom, pan and select features on interactive maps to explore specific sites, policies and constraints, including flood risk areas and housing and employment allocations;
- **increases accessibility and transparency:** Digital formats allow people or organisations to view and engage with the Local Plan at any time, from any location and on any device, while improving understanding of the relationship between policies, evidence, mapped information and the strategic direction of the Local Plan, particularly among groups that may have found traditional consultation methods less approachable; and
- **improves efficiency:** Digital tools, including interactive story maps, online surveys and AI-assisted analysis, will help us process consultation responses more efficiently, supporting faster reporting and wider community participation.

7.2 Traditional Local Plans often relied on lengthy text and complex cross-referencing, which created barriers to understanding. Digital plan-making, on the other hand, emphasises interactive mapping, structured content and web-based presentation, allowing users to explore policies and proposals in a more intuitive way, supporting clearer communication and accessible exploration of policies and

proposals. This approach enables residents, stakeholders and decision-makers to access information more easily and understand how policies relate to specific places across the borough.

Geospatial foundations and spatial clarity

7.3 The government's Local Plan Explainer sets out a clear digital baseline that shapes how the plan is structured, presented and accessed¹¹. Our consultation website will include interactive mapping that links policy content to baseline spatial data. Users will be able to explore layers that show constraints, opportunities, settlement boundaries, environmental designations and site allocations.

Structured and standardised content

7.4 The digital baseline, utilising MHCLG's standardised templates, will inform the SWOT analysis of the borough's places, shaping how strengths, weaknesses, opportunities and threats are presented and ensuring that each element aligns with the structured, map-led and data-driven approach set out in the Local Plan Explainer. This structured analysis will help shape the vision and objectives of the new Local Plan, supporting clearer articulation of strategic priorities, fostering stronger links between mapped evidence and policy direction, and a more transparent expression of 'measurable outcomes' to demonstrate how the Local Plan will be delivered and monitored over time.

7.5 Local Plan policies linked to these elements will be presented in formats that enhance readability, support geo-spatial presentation and enable machine-readable outputs capable of connecting with wider datasets and planning tools.

¹¹ www.gov.uk/government/publications/plan-making-regulations-explainer/plan-making-regulations-explainer

8 Risk management and mitigation

- 8.1** Preparing the Bedford Borough Local Plan 2050 will demand strong forward-thinking risk management to ensure the process remains on track and resilient to unforeseen change.
- 8.2** A live register (see table 5) will be maintained at each preparation stage to identify, assess and mitigate emerging risks. This approach will ensure early timely interventions on unforeseen issues and underpins the effective and reliable delivery of this plan.
- 8.3** A range of factors will influence the work programme and must be actively managed throughout the plan-making process, including:
- strong political leadership and corporate commitment, to provide strategic direction and sustained support;
 - timely appointment of consultants and delivery of evidence alongside efficient procurement processes and a robust project management framework;
 - adequate resourcing, including staff capacity, recruitment and access to specialist expertise;
 - findings from the latest baseline data and annual monitoring returns, which may influence the scope, timing or direction of the plan (see chapter 9);
 - the need to produce a sound and robust evidence base, including statutory assessments, such as the Habitats Regulations Assessment and Integrated Impact Assessment;
 - availability and deliverability of land, ensuring sufficient suitable sites are identified to meet development needs, especially through the 'call for sites' process; and
 - effective stakeholder engagement and public consultation, with careful scheduling to avoid election periods, major holidays and other constraints on participation.
- 8.4** The new Bedford Borough Local Plan carries a high number of interrelated risks due to the scale, complexity and cross boundary nature of the issues it must address (as outlined in table 5).
- 8.5** Successful delivery of this plan is dependent on multi-agency collaboration across infrastructure, funding and technical evidence. The scale of growth envisaged will require significant external funding, potentially running into the billions across the borough and wider sub region, including direct government grants, developer contributions, private finance and other strategic investment interventions. Achieving the 30-month timetable remains a considerable risk unless government departments and agencies (including the Ministry of Housing, Communities and Local Government, the Department for Transport, National Highways, Homes England and the New Towns Task Force) commit - through a memorandum of understanding or similar mechanism – at the early scoping stage to joint funding, agreed modelling inputs and the infrastructure delivery arrangements needed to support Bedford's plan-led growth.
- 8.6** As work progresses on the new Local Plan, it will be critical to undertake a thorough assessment of the infrastructure requirements associated with nationally significant developments listed in paragraph 6.5 above, as these are expected to significantly shape population growth and housing needs throughout the forthcoming plan period. Future interventions will need to extend well beyond Universal Studio's planned short-to-medium term capacity enhancements (e.g. A421 junctions, remodelled train station and dual carriageway access road) to ensure the borough can accommodate rising population pressures, tackle existing housing shortages and respond to the

wider impacts of other nationally significant projects. Together, these schemes will place substantial additional demands on local and strategic infrastructure, requiring a coordinated, long-term and integrated approach to planning and delivery that can also support plan-led growth up to 2050. The withdrawal of the 2040 Bedford Borough Local Plan demonstrates the risks of progressing without firm infrastructure commitments, clear cross-agency funding arrangements and agreed modelling inputs.

- 8.6** As one of the fastest growing areas in the East of England, Bedford is expected to experience significant population growth over the plan period to meet future housing and employment needs, which risks outpacing the capacity of existing infrastructure, particularly water supply and sewage systems.
- 8.7** Limited water availability presents a significant risk in Bedford, with Anglian Water (the statutory provider of drinking water and sewage and wastewater services across the borough) indicating that existing supplies and treatment systems already operating close to their limits. To support plan-led growth, clear commitments will be needed from Anglian Water and other utility providers in the borough to support long-term resource planning, capacity upgrades and the alignment of modelling assumptions.
- 8.7** The box highlights the principal risks to the successful adoption of the Bedford Borough Local Plan, summarising the main issues requiring early resolution as set out in more detail in table 5.

- Potential loss of key staff alongside recruitment, retention and ongoing capacity challenges linked to the scale of future growth
- Potential delays to plan production and high costs linked to new digital systems and evidence gathering (e.g. baseline mapping)
- Achieving political consensus in a complex and evolving planning environment and shifting priorities
- Financial constraints and challenges - reliance on government funding and multi-agency support to deliver plan-led growth in the context of rising costs (e.g. inflation) and demands arising from national growth initiatives like East West Rail, Universal and the proposed new towns at Milton Keynes and Tempsford (including hotel accommodation, school places and waste water capacity)
- Achieving the accelerated 30-month timetable amid uncertainty and complex external factors that remain outside of our control, including dependences on sub-regional modelling, market volatility affecting deliverability, capacity constraints in key government agencies and the timing of national infrastructure decisions
- Further changes to national planning policy guidance and the regulations - affecting the approach to plan-making
- Cross-boundary working in a non-combined authority area without formal governance arrangements (e.g. growth board)
- Infrastructure delivery pressures – addressing funding shortfalls and capacity gaps in a high-demand, sub-regional context
- Capacity and availability of external consultants, specialists and planning inspectors to undertake key preparation tasks, including gateway checks and the independent examination
- Risk of legal challenge due to uncertainty over delivery, heightened scrutiny and current evidence gaps

Table 5: Risk register - Bedford Borough Local Plan 2050

This framework assesses the risks associated with the Bedford Borough Local Plan 2050 through several key components (A-D):

A Likelihood: Estimates the probability of the risk occurring (rated as unlikely, foreseeable or highly likely).

B Impact: Measures the potential severity of consequences should the risk materialise (rated as negligible, moderate, or severe).

C Risk rating (pre-mitigation): Combines the likelihood and impact ratings to determine the inherent level of risk (rated as high, medium, or low) before any controls or actions have been applied.

D Residual risk (Post-mitigation): Assesses the remaining level of risk after mitigation measures have been implemented (rated as high, medium, or low). This helps decision-makers understand whether the risk is now tolerable or whether further action is required.

Mitigation measures describe the actions, controls, or strategies designed to reduce either the likelihood of the risk occurring or the severity of its impact.

Risk	Description of the risk and associated impacts	A Likelihood: Unlikely, foreseeable or highly likely	C Risk: High, medium, low	Contingency	Mitigation measures
		B Impact: Negligible, moderate or severe	D Residual risk: With mitigation applied		
1 Infrastructure capacity and provision					
1.1: Failure to deliver infrastructure to appropriately support development	<ul style="list-style-type: none"> Uncertainties remain around rail, road and water infrastructure, including the detailed timetable to deliver East-West Rail, upgrades to the A1, A421, A428 and other critical projects. Without clear infrastructure commitments and meaningful change, we risk repeating the challenges that derailed the 2040 Bedford Borough Local Plan – leading to delays, reputational damage and wasted resources. There is a risk that essential local services such as health provision, pubs and community facilities are not delivered in the early stages of development, creating gaps in 	Foreseeable	High	Sign memorandum of understanding (or equivalent) with key bodies. Produce a live, up-to-date Infrastructure Delivery Plan to facilitate early provision of infrastructure to support the phased delivery of site allocations. Develop a Spatial Development Strategy covering the broader area alongside development of the new Local Plan.	<ul style="list-style-type: none"> Close alignment with relevant infrastructure providers, including East West Rail, Department for Transport, National Highways, Homes England and the Ministry of Housing, Communities and Local Government (MHCLG). Formalise shared commitments between partners and clarify roles and decision-making arrangements to ensure accountability and coordinated delivery across the plan period. Respond to public consultations and keep up to speed with the latest strategic infrastructure delivery programmes. Early phase policy interventions, including use of delivery trajectories/phasing plans and strategic masterplanning requirements. Use of planning conditions, legal agreements (e.g. section 106) and article 4 directions
		Major	High		

Risk	Description of the risk and associated impacts	A Likelihood: Unlikely, foreseeable or highly likely		C Risk: High, medium, low	Contingency	Mitigation measures
		B Impact: Negligible, moderate or severe		D Residual risk: With mitigation applied		
	infrastructure and reducing the quality of emerging neighbourhoods.					<ul style="list-style-type: none"> Monitoring and intervention mechanisms to facilitate the delivery of community assets.
1.2: Water provision, sewerage and recycling	<ul style="list-style-type: none"> Water supply and water recycling capacity remains severely constrained across the region Investment is planned (laid out in the Anglian Water Resources Management Plan) but strategic infrastructure, such as new reservoirs, are unlikely to be completed prior to the mid-2030s. Further pressures from the Universal theme park and new towns will place additional demands on this network. There is a recognised risk that water supply and wastewater treatment capacity - particularly at water recycling centres - may be insufficient to support planned growth in the borough. 		Foreseeable	High	<p>Sign a memorandum of understanding with key bodies.</p> <p>Work closely with all authorities within the water catchment (clean and sewerage) to effectively engage with Anglian Water and Environment Agency on a strategic scale.</p> <p>Engage with OFWAT (the economic regulator of waste water and sewage companies) and MHCLG</p>	<ul style="list-style-type: none"> Engage early with Anglian Water and the Environment Agency to understand their investment timelines and how they will accommodate the growth projected in the borough. Prepare an integrated Water Cycle Plan and Strategic Flood Risk Assessment as part of the evidence base. Engage proactively during annual monitoring and data gathering stages based on 5-yearly review cycles.
			Highly likely	High		
2 Neighbourhood Plans						
2.1: Lack of capacity/resources	<ul style="list-style-type: none"> Insufficient resources could limit our capacity to support statutory Neighbourhood Plans and the Local Plan in parallel, increasing the risk of slippage. 		Highly likely	Medium	<p>Review the scope and contents of neighbourhood plans</p> <p>Regular engagement with neighbourhood planning groups</p>	<ul style="list-style-type: none"> Provide ongoing dedicated advice to neighbourhood groups at key stages, including parish and town councils. Increase the capacity of the team to support neighbourhood planning.
			Moderate	Medium		
2.2: Neighbourhood Plans progressing more quickly than the new Local Plan	<ul style="list-style-type: none"> This could lead to the two parts of the development plan gradually diverging, creating inconsistencies in the supporting evidence base. 		Foreseeable	Medium		<ul style="list-style-type: none"> Engage with Neighbourhood Plan groups like parish and town councils to seek alignment as far as practicable with the new Local Plan. Ensure emerging evidence takes account of Neighbourhood Plans. Share baseline data.
			Moderate	Low		

Risk	Description of the risk and associated impacts	A Likelihood: Unlikely, foreseeable or highly likely		C Risk: High, medium, low	Contingency	Mitigation measures
		B Impact: Negligible, moderate or severe		D Residual risk: With mitigation applied		
3 Political decision making						
3.1: Political processes/changes arising from national/local elections, pre-election periods and changed political priorities	<ul style="list-style-type: none"> Political processes and changes risk programme slippage, abortive work arising from national shifts in and disruption linked to evolving council political makeup and priorities during plan preparation. With no party in overall control, securing Executive or Full Council approval at key stages of the Local Plan process may be more difficult. 	Foreseeable	Severe	Medium	Engage with members at strategic management team, head of planning and planning policy manager levels	<ul style="list-style-type: none"> Internal governance arrangements (including the cross-party members working group – see section 5) enable elected members to engage with officers, ensuring alignment and informed decision-making throughout the plan-making process.
		Severe	Severe	Medium		
3.2: Wider political (national and local) administrative changes	<ul style="list-style-type: none"> Examples could include shifts in government policy direction, changes to planning legislation or guidance, local government reorganisation/devolution and changes in political leadership. 	Foreseeable	Moderate	Medium	Seek expert advice (e.g. Planning Advisory Service and legal opinion).	<ul style="list-style-type: none"> Maintain close monitoring of national and local political developments, including legislative changes, funding announcements and shifts in leadership or policy direction. Build flexibility into the Local Plan programme and evidence base to enable timely adjustments and respond to emerging changes.
		Moderate	Moderate	Green	Engage proactively with MHCLG to ensure early visibility of any changes affecting plan delivery.	
3.3: Lack of political support and endorsement	<ul style="list-style-type: none"> Agreement may not be secured at Executive and Full Council. Another potential risk is the lack of political support and consensus among elected members and ward councillors. 	Foreseeable	Moderate	Medium	Engage proactively with cross-party member group to instil a greater sense of ownership and collective responsibility.	<ul style="list-style-type: none"> Elected members are expected to play an active role in shaping and delivering the Local Plan, with officers providing support through established forums and technical briefings. Ongoing engagement with the Planning Advisory Service (PAS) and the use of targeted peer reviews to reinforce statutory obligations, offer independent scrutiny and help maintain momentum and progress.
		Moderate	Moderate	Medium	Undertake a 'deeper dive' into critical areas of evidence	
3.4: Inspector's report – at the examination stage	<ul style="list-style-type: none"> The planning inspector may put forward recommendations that the council finds difficult to accept. 	Foreseeable	Severe	Medium	None available (as the planning inspector's decision is final).	<ul style="list-style-type: none"> Provide robust evidence and engage proactively during the examination to influence outcomes.
		Severe	Severe	Medium		

Risk	Description of the risk and associated impacts	A Likelihood: Unlikely, foreseeable or highly likely	C Risk: High, medium, low	Contingency	Mitigation measures
		B Impact: Negligible, moderate or severe	D Residual risk: With mitigation applied		
					<ul style="list-style-type: none"> Advise elected members of available options and risks
4 Engagement and legal compliance					
4.1: Failure to meet the legal and soundness tests	<ul style="list-style-type: none"> Legal compliance and soundness tests may not be met at the independent examination. 	Foreseeable	Medium	Sign memorandum of understanding (or similar) with key bodies. Pass the gateway checks (see figure 7).	<ul style="list-style-type: none"> Clear project management (timelines, identified inter-dependencies and deliverables). Effective public consultations. Ongoing engagement with specific prescribed bodies and partners (recorded through meeting notes or actions). Production of joint evidence (including work aligned with the Spatial Development Strategy, wherever appropriate). Creation of robust, evidence-led policies
		Severe	Medium		
4.2: Legal challenge	<ul style="list-style-type: none"> Legal challenge after adoption could disrupt delivery and result in reputational and financial consequences. 	Foreseeable	High	Obtain legal advice from Kings Counsel.	<ul style="list-style-type: none"> Seek appropriate legal advice through the preparation of the new Local Plan and keep abreast of best practice.
		Moderate	Medium		
4.3: Significant public opposition to the new Local Plan	<ul style="list-style-type: none"> High response rates could generate an unexpectedly large volume of feedback, creating programme slippage. 	Foreseeable	Medium	Provide dedicated injection of resource to support Local Plan matters.	<ul style="list-style-type: none"> Engage additional staff resources during and after consultation periods (project specific, as required). Use of external specialists where necessary and appropriate. Investment in enhanced digital consultation systems to enable the best user experience and encourage online responses to be received (available via MHCLG PropTech funding).
		Moderate	Low		

Risk	Description of the risk and associated impacts	A Likelihood: Unlikely, foreseeable or highly likely	C Risk: High, medium, low	Contingency	Mitigation measures
		B Impact: Negligible, moderate or severe	D Residual risk: With mitigation applied		
4.4: Lack of engagement or collaboration from neighbouring councils and other public bodies on sub-regional and nationally important planning work	<ul style="list-style-type: none"> The new Local Plan operates within a nationally significant growth area, creating exposure to issues that extend beyond local influence or control. Undertaking sub-regional work alone will increase costs, strain officer capacity and reduce Bedford's influence over cross-boundary planning, potentially weakening strategic coherence and diverting resources from the new Local Plan. Lack of progress on cross-boundary matters poses a risk to the soundness of the new Local Plan potentially undermining its effectiveness and the successful delivery of key strategic initiatives. 	Foreseeable	High	<p>Sign statements of common ground with key bodies (neighbouring and government organisations) where no progress can be made on cross-boundary matters.</p> <p>Continue to meet to record discussion, even if no progress is made.</p>	<ul style="list-style-type: none"> Prepare and implement an engagement strategy at the scoping stage and ensure early engagement at officer and member level (third party involvement will also be critical, but this risk is primarily outside the influence/control of the council). Maintain appropriate ongoing engagement with statutory partners (e.g. neighbouring authorities, government agencies and other relevant statutory bodies) on identified cross-boundary issues from the outset. Ongoing liaison will support the timely identification and resolution of key issues, though resource constraints may limit the ability of key partners and statutory bodies to engage at the necessary pace. Track forthcoming announcements on Spatial Development Strategy geographies and regulations to engage as soon as clarity emerges.
		High	High		
4.5: Problems or inability to engage with key stakeholders and local community representatives	<ul style="list-style-type: none"> Lack of input from statutory bodies and delivery partners may undermine the robustness of technical evidence and assumptions. Limited community engagement can erode public trust and diminish the perceived legitimacy of the Local Plan. Delays in securing stakeholder input or agreement may hinder plan preparation and jeopardise delivery milestones. 	Unlikely	Medium	<p>Signed statements of common ground (or similar) to demonstrate agreed positions.</p> <p>Escalate early where engagement stalls, using formal mechanisms and senior-level contacts to re-establish dialogue.</p> <p>Obtain critical feedback through targeted briefings and focussed sessions.</p>	<ul style="list-style-type: none"> Raise any problems or issues through appropriate channels. Continue to engage and maintain good relationships with residents, local community groups and other key stakeholders Ensure multiple touchpoints with key stakeholders throughout the process using varied engagement forms (meetings, written response, update phone calls). Draft an engagement strategy (drawing on local knowledge from engagement teams). Investment in enhanced digital consultation systems to enable the best user experience and encourage online responses.
		Moderate	Medium		

Risk	Description of the risk and associated impacts	A Likelihood: Unlikely, foreseeable or highly likely	C Risk: High, medium, low	Contingency	Mitigation measures
		B Impact: Negligible, moderate or severe	D Residual risk: With mitigation applied		
					<ul style="list-style-type: none"> Publish a summary of consultation findings after each stage of the process to show how feedback has informed the new Local Plan.
5 Resources					
5.1: Budget Impacts	<ul style="list-style-type: none"> Risks include timetable delays, a longer examination period, legal challenge, impacts of national planning policy requirements, additional evidence base needs or political changes (national or local). 	Foreseeable	High	Prioritise statutory and critical evidence, while pausing or discontinuing lower-priority, 'nice-to-have' work in a controlled and transparent manner.	<ul style="list-style-type: none"> Close monitoring of the Local Plan budget and anticipated future commitments. Ensure risks are raised during the budget monitoring process. Seek external funding sources (bidding opportunities). Regular budget monitoring and forecasting. Use effective project management to bundle workstreams and secure procurement efficiencies. Ongoing engagement with section 151 officer, corporate leadership team and members. RAG rated project management tool to early flag issues arising including an 'live' risk register. Ensure strategic development projects linked to site allocations do not exceed allocated budgets and remain on schedule.
		Severe	High		
5.2: Increased costs/insufficient budget - leading to key aspects of the work programme being compromised	<ul style="list-style-type: none"> This could result in programme delays and lead to additional costs in the event of a legal challenge. Undertaking evidence studies, public consultation events and the formal examination of the Local Plan require significant financial resources. Any additional unforeseen costs would place a further burden on the budget. The risk is higher during periods of significant planning reform (new NPPF/regulations). 	Foreseeable	High	Consider use of contingent funding to cover 'end stage processes' such as examination or adoption.	
		Severe	Medium		
5.3: Lack of capacity/resources to deliver planning policy documents in line with timescales identified in figure 7	<ul style="list-style-type: none"> Unforeseen pressures on staff time may arise from parallel strategic workstreams, emerging planning reforms or wider regional and national consultations. This convergence could divert capacity away from the Local Plan and 	Highly likely	High	Reconsider timetable and workstream commitments against priorities. Seek external funding from MHCLG and other potential	<ul style="list-style-type: none"> Provide appropriate training to encourage staff retention and upskill team. Consider redeployment of suitable staff from other planning teams/secondments should opportunities arise to meet key targets and milestones.
		Severe	High		

Risk	Description of the risk and associated impacts	A Likelihood: Unlikely, foreseeable or highly likely	C Risk: High, medium, low	Contingency	Mitigation measures
		B Impact: Negligible, moderate or severe	D Residual risk: With mitigation applied		
	<p>undermine the programme timetable.</p> <ul style="list-style-type: none"> Loss of staff resource (temporary or permanent) also poses a risk to project continuity and progress. 			sources as appropriate	<ul style="list-style-type: none"> Consider recruitment incentives and the use of consultants where specific expertise is required. Employ agency staff/consultants to cover periods of absence (subject to available budgets).
5.4: Lack of capacity/resources within external organisations (consultancy agencies, government agencies/departments and the Planning Inspectorate)	<ul style="list-style-type: none"> Greater responsibility: Public sector bodies are now prescribed to assist plan making under the new regulations (specifically through the 'requirement to assist' provisions within the Levelling-up and Regeneration Act 2023). Capacity pressures are more likely where short turnaround times are imposed and where no lead-in notice is provided, increasing the risk of delayed or incomplete responses at key stages. Planning reforms under the new and legacy systems (with cut-off dates) may lead to 'stacking' of local planning authorities at key stages. 	Unlikely	Medium	<p>Escalate early where delays threaten statutory milestones.</p> <p>Build flexibility into the programme at the scoping stage.</p> <p>Use framework agreements and alternative suppliers (procurement of services).</p>	<ul style="list-style-type: none"> This risk is primarily outside the influence or control of the council, but mitigation measures include: <ul style="list-style-type: none"> advanced notification of relevant timescales will be provided to help inform the Planning Inspectorate's relevant work programmes and those of other key stakeholders; working on the basis of an average six-month examination period under the new system; and monitoring ongoing recruitment of new planning inspectors as part of wider capacity-assurance measures.
		Moderate	Medium		
5.5: Insufficient team resources/higher staff turnover	<ul style="list-style-type: none"> Reduced capacity within the team could lead to slippage and require additional staff resources – both within and outside of the team to provide essential inputs into the Local Plan due to: <ul style="list-style-type: none"> staff departures, sickness or unplanned absences; and 	Foreseeable	High	<p>Identify gaps early and initiate recruitment.</p> <p>Maintain access to external support and retain flexibility to commission short-term consultancy input</p>	<ul style="list-style-type: none"> Consider recruitment incentives and redeployment of suitable staff from other teams where opportunities arise to meet key priorities, targets and milestones. Use consultants, where appropriate, to progress basic workstreams where specific expertise is required.

Risk	Description of the risk and associated impacts	A Likelihood: Unlikely, foreseeable or highly likely	C Risk: High, medium, low	Contingency	Mitigation measures
		B Impact: Negligible, moderate or severe	D Residual risk: With mitigation applied		
	<ul style="list-style-type: none"> recruitment difficulties, including vacant posts that might not be filled. Experience shows it is difficult to recruit suitably qualified staff with Royal Town Planning Institute (RTPI) membership and is a widespread challenge across the sector, especially in the context of local government reorganisation. 	Severe	High	<p>during peak workloads.</p> <p>Prioritise statutory and time-critical tasks to focus limited resources on essential outputs.</p> <p>Monitor turnover, workload pressures and wellbeing indicators to spot emerging risks early and intervene.</p>	<ul style="list-style-type: none"> Favour staff to work part time/more flexibly rather than to lose valuable/knowledgeable resources. Review working conditions, demands and assess team morale/mental health pressures Opportunities to share resources and jointly procure studies between neighbouring authorities through East West Rail, Universal and the proposed new towns. Continue proactive recruitment, including developing staff from graduate level. Provide targeted training (e.g. digital skills) to support staff retention, strengthen resilience and build wider corporate awareness.
5.6: Insufficient staff resources in other internal teams	<ul style="list-style-type: none"> Ongoing budget pressures may affect the delivery and timing of planned work. Financial, scheduling and procurement issues could significantly impact the timetable and overall quality of the Local Plan. 	Foreseeable	High	<p>Reconsider the timetable commitments if the risk/impact cannot be mitigated and no resource is available in the short term.</p>	<ul style="list-style-type: none"> Continue to engage and maintain good relationships with key teams throughout the plan process. Officers from other teams or service areas to oversee or input into key pieces of evidence. Set up stakeholder meetings to discuss key outputs. Early and ongoing engagement where relevant.
		Severe	High		
5.7: Lack of in-house expertise in certain specialist disciplines	<ul style="list-style-type: none"> Disruptions to the timetable or the quality of the Local Plan could be severe, particularly due to finance, timescales and procurement pressures. Some specialisms will be drawn from external consultants on a project-by-project basis. 	High	High	<p>Employ agency staff/consultants to cover periods of absence (subject to available budgets).</p> <p>Seeking external funding sources (bidding opportunities).</p> <p>RAG rated project management tool to early flag issues</p>	<ul style="list-style-type: none"> This risk sits largely outside our direct influence or control, although early and ongoing engagement remains essential where relevant.
		Severe	Moderate		

Risk	Description of the risk and associated impacts	A Likelihood: Unlikely, foreseeable or highly likely	C Risk: High, medium, low	Contingency	Mitigation measures
		B Impact: Negligible, moderate or severe	D Residual risk: With mitigation applied		
				arising including an 'live' risk register.	

6 Policy and legislation

6.1: Changes in national policy and legislation which require a significant alteration to Local Plan content and timetable

- New regulations and the publication of the National Planning Policy Framework have already experienced significant delays. The new NPPF is expected to be finalised in summer 2026.
- The staggered, drip-feed publication of plan-making guidance has led to uncertainty and has reduced the ability to plan proactively with strong confidence.
- Further government consultations are expected on reforms relating to digital planning, devolution, and strategic planning, including updates to Planning Practice Guidance.
- These changes are expected to continue exerting significant influence throughout the plan-making process.



Foreseeable



Severe



High



High

Obtain legal advice from Kings Counsel where changes jeopardise meeting the 30-month timetable.

Sign a memorandum of understanding with key bodies, including MHCLG and New Towns Task Force.

- Maintain robust evidence and awareness of further changes to national planning policy and associated guidance to address emerging issues and priorities.
- Liaise with government agencies - MHCLG, New Towns Task Force, Planning Inspectorate (PINS) and Planning Advisory Service (PAS) - to identify upcoming changes.
- Assess required revisions to the new Local Plan as soon as practicable.
- Ensure the work programme remains flexible to incorporate evidence-base changes.
- Update the Local Plan timetable as necessary to reflect new government policy or legislative changes affecting requirements or timelines.

Risk	Description of the risk and associated impacts	A Likelihood: Unlikely, foreseeable or highly likely	C Risk: High, medium, low	Contingency	Mitigation measures
		B Impact: Negligible, moderate or severe	D Residual risk: With mitigation applied		

7 Project management – meeting key project milestones

7.1: Preparation of the new Local Plan to meet key project milestones i.e. delays to production or programme slippage

- The 30-month timetable is challenging given the complexity of the Local Plan and dependence on effective sub-regional and government coordination.
- Delays in the publication of standardised templates (e.g. the call-for-sites template) create a risk to the Local Plan timetable and could disrupt early-stage preparation.
- Delays in external evidence preparation, failure of partners to provide evidence on time and unexpected levels of public engagement could all cause delays and compromise the quality of the evidence base.
- Soundness and legal compliance checks (e.g. gateway 3 assessment) could uncover complex, potentially unresolvable issues at a late stage, which would require moving back a stage in the process.
- There is also uncertainty about the capacity of the Planning Inspectorate to manage numerous Local Plans and Spatial Development Strategies submitted around the same time.



Highly likely - due to the new system and alignment of several Local Plan timetables



Severe



High



High

Monthly updates on the timetable.

Regular dialogue with MHCLG, PAS and PINS.

No contingency during the examination period as the Planning Inspectorate is the sole body able to undertake this process.

- Monitor progress and give priority to achieving the key milestones set out in this PID.
- Provide resources and funding to complete evidence gathering.
- Encourage early engagement to secure input and expert advice from internal and external partners.
- Build in flexibility in the programme at the scoping stage in event of possible delays.
- Reflect on lessons learnt from preparing previous development plans.
- Delays to the timetables resulting from various issues such as an exceptionally high response rates to public consultations or protracted internal processes, particularly relating to key stages of plan production.
- Use suitable technology to assist with the analysis of consultation outcomes and draw upon wider council resources where possible.
- Set up suitable governance arrangements to ensure a nimble and transparent plan-making process, whilst internal processes will be established which are both supportive and flexible; delays could affect the examination and adoption of the Local Plan.

Risk	Description of the risk and associated impacts	A Likelihood: Unlikely, foreseeable or highly likely	C Risk: High, medium, low	Contingency	Mitigation measures
		B Impact: Negligible, moderate or severe	D Residual risk: With mitigation applied		
7.2: Universal theme park development	<ul style="list-style-type: none"> Construction delays could disrupt delivery timelines and undermine confidence in the wider strategy. Fragmented working between Universal and Local Plan partners risks misalignment and lost opportunities to coordinate outcomes. There is a reliance on up-to-date datasets and a detailed baseline to inform modelling work (e.g. transport assessments and housing supply needs). Potential tensions between the theme park's ambitions and local priorities could compromise optimal land use and diminish wider community benefits. Further pressures from the Universal theme park and new towns will place additional demands on the borough's infrastructure network, with a recognised risk that water supply and wastewater treatment capacity - particularly at water recycling centres - may be insufficient to support planned growth. 	Foreseeable	High	<p>Obtain advice from Kings Counsel if required.</p> <p>Employ agency staff/consultants to assess cross-boundary impacts on travel, labour supply and visitor flows and enable alignment where other engagement routes are unsuccessful (subject to available budgets).</p>	<ul style="list-style-type: none"> Establish a joint governance framework to coordinate decision-making, clarify roles and align strategic priorities across partners and administrative boundaries. Ongoing viability appraisals to test land values, development costs or delivery sequencing. Hold regular cross-organisational liaison meetings to maintain open communication, share updates and secure early resolution. Develop a shared delivery roadmap that integrates Universal's programme with Local Plan milestones, ensuring mutual awareness of dependencies and timelines. Agree a joint evidence base (e.g. spatial modelling of growth outcomes) and spatial principles to underpin both the theme park and Local Plan, supporting coherent outcomes and reducing duplication.
		Severe	High		

9




Monitoring the timetable

- 9.1 Monitoring and updating the new Bedford Borough Local Plan 2050 timetable forms a core component of plan-making.
- 9.2 Under the new plan-led system, the timetable (see figure 7) is a live document, requiring monthly updates to ensure it accurately reflects the latest position. Specific mandatory revisions are also required at key milestones, such as the publication of gateway assessments or the planning inspector's final report. These updates ensure the timetable reflects changes in national planning policy, resource levels, evidence requirements and extent of consultation feedback, consistent with statutory requirements.
- 9.3 Any delay, acceleration or change in scope will necessitate a formal update to this timetable. However, such updates will not require Executive or Full Council approval (see table 2) and can be implemented through delegated decision-making in accordance with our constitution.
- 9.4 After formal adoption, the new Local Plan will move into an ongoing monitoring phase. Under the new system, monitoring will be more structured and digitally based, using standardised datasets and formats to measure outcomes and track how well the plan performs within each plan-making cycle.
- 9.5 We currently publish an Authority Monitoring Report (AMR) each year, although future regulations and guidance may update or replace this requirement. Monitoring will continue to assess how the plan is being implemented against key indicators and targets, including nationally prescribed metrics.

- 9.6 At each preparation stage, this document will be updated to show progress against the consultation milestones set out in the Local Plan timetable.
- 9.7 Once adopted, the Local Plan will undergo five-yearly reviews to ensure it is up-to-date and aligned with national planning policy requirements, which will help prevent speculative development and ensure that identified needs are met. In addition, the new plan-led system will introduce live infrastructure delivery plans that will continuously monitor the progress of infrastructure delivery during the plan period, ensuring it remains synchronised with site allocations and supports sustainable growth.

10

Contact details

- 10.1 This document is available to view on our web pages at www.bedford.gov.uk/planning-and-building-control/planning-policy.
- 10.2 Should you have any queries about the new plan process, please contact us in one of the following ways:
 -  Email: planning.policy@bedford.gov.uk
 -  Telephone: 01234 267422
 -  Post: Planning Policy Team, Bedford Borough Council, Borough Hall, Cauldwell Street, Bedford. MK42 9AP
- 10.3 If you require this information in an alternative format or language, please contact us. Requests are assessed on an individual basis.

